

Agenda

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Council (Special meeting)

Date: **Thursday 20 September 2012**

Time: **5.30 pm**

Place: **Council Chamber, Town Hall**

For any further information please contact:

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The meeting will also be available via a webcast. This means that people may choose to watch all or part of the meeting over the internet rather than attend in person. The webcast will be available to view on the City Council's website after the meeting.

Council

Membership

Lord Mayor

Councillor Alan Armitage

Deputy Lord Mayor

Councillor Mohammed Abbasi

Sheriff

Councillor Dee Sinclair

Councillor Elise Benjamin

Councillor Jean Fooks

Councillor Mohammed Altaf-Khan

Councillor Antonia Bance

Councillor Laurence Baxter

Councillor Tony Brett

Councillor Jim Campbell

Councillor Anne-Marie Canning

Councillor Bev Clack

Councillor Mary Clarkson

Councillor Colin Cook

Councillor Van Coulter

Councillor Steven Curran

Councillor Roy Darke

Councillor James Fry

Councillor John Goddard

Councillor Michael Gotch

Councillor Mick Haines

Councillor Sam Hollick

Councillor Rae Humberstone

Councillor Graham Jones

Councillor Pat Kennedy

Councillor Shah Khan

Councillor Ben Lloyd-Shogbesan

Councillor Mark Lygo

Councillor Sajjad Malik

Councillor Stuart McCready

Councillor Joe McManners

Councillor Mark Mills

Councillor Helen O'Hara

Councillor Susanna Pressel

Councillor Bob Price

Councillor Mike Rowley

Councillor Gwynneth Royce

Councillor David Rundle

Councillor Gill Sanders

Councillor Scott Seamons

Councillor Craig Simmons

Councillor Val Smith

Councillor John Tanner

Councillor Ed Turner

Councillor Oscar Van Nooijen

Councillor Ruth Wilkinson

Councillor David Williams

Councillor Dick Wolff

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SUMMONS

A special meeting of the City Council will be held in the Council Chamber, Town Hall, on Thursday 20 September 2012 at 5.30 pm to transact the business set out below.

Peter Sloman

Proper Officer

AGENDA

Pages

1 DECLARATIONS OF INTEREST

2 APOLOGIES FOR ABSENCE

3 ADDRESSES BY THE PUBLIC

To hear addresses from members of the public in accordance with Council Procedure Rule 11.8(c) for which the required notice (1.00pm on Tuesday 18th September 2012) and the full wording of the address has been given to the Head of Law and Governance.

4 BARTON AREA ACTION PLAN AND SITES AND HOUSING PLAN EXAMINATIONS

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The Head of City Development has submitted a report which seeks Council's endorsement of the Main Modifications to the Barton Area Action Plan and the Addendum to both the Sustainability Appraisals for the Barton Area Action Plan and the Sites and Housing Plan. As a consequence of the revised Sustainability Appraisal, for the City Council to confirm its policy approach in relation to the allocation of Land at Ruskin College.

Council is asked to:

- (1) To endorse the Main Modifications to the Barton Area Action Plan as part of the approved plan
- (2) To endorse the Barton Area Action Plan (as amended by the Main

Modifications) as a material consideration in determining planning applications

- (3) To endorse the Addendum to the Sustainability Appraisal for the Barton Area Action Plan
- (4) To endorse the Addendum to the Sustainability Appraisal for the Sites and Housing Plan
- (5) To confirm the approach taken to the Ruskin College proposals as agreed at Council on 19th December 2011, in relation to the Barton AAP and Sites and Housing Plan.

DECLARING INTERESTS

General duty

You must declare any disclosable pecuniary interests when the meeting reaches the item on the agenda headed "Declarations of Interest" or as soon as it becomes apparent to you.

What is a disclosable pecuniary interest?

Disclosable pecuniary interests relate to your employment; sponsorship (ie payment for expenses incurred by you in carrying out your duties as a councillor or towards your election expenses); contracts; land in the Council's area; licences for land in the Council's area; corporate tenancies; and securities. These declarations must be recorded in each councillor's Register of Interests which is publicly available on the Council's website.

Declaring an interest

Where any matter disclosed in your Register of Interests is being considered at a meeting, you must declare that you have an interest. You should also disclose the nature as well as the existence of the interest.

If you have a disclosable pecuniary interest, after having declared it at the meeting you must not participate in discussion or voting on the item and must withdraw from the meeting whilst the matter is discussed.

Members' Code of Conduct and public perception

Even if you do not have a disclosable pecuniary interest in a matter, the Members' Code of Conduct says that a member "must serve only the public interest and must never improperly confer an advantage or disadvantage on any person including yourself" and that "you must not place yourself in situations where your honesty and integrity may be questioned". What this means is that the matter of interests must be viewed within the context of the Code as a whole and regard should continue to be paid to the perception of the public.

¹Disclosable pecuniary interests that must be declared are not only those of the member her or himself but also those of the member's spouse, civil partner or person they are living with as husband or wife or as if they were civil partners.

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To: Special Council

Date: 20th September 2012

Report of: Head of City Development

Title of Report: Barton Area Action Plan and Sites and Housing Plan Examinations

Summary and Recommendations

Purpose of report: This report seeks Council's endorsement of the Main Modifications to the Barton Area Action Plan and the Addendum to both the Sustainability Appraisals for the Barton Area Action Plan and the Sites and Housing Plan. As a consequence of the revised Sustainability Appraisal, for the City Council to confirm its policy approach in relation to the allocation of Land at Ruskin College.

Key decision? No

Executive lead member: Councillor Colin Cook

Policy Framework: The contribution of new housing from the Land at Barton and the Sites and Housing Plan, and associated regeneration are fundamental to achieving the objectives of the Council's Corporate Plan (more housing, better housing for all) and the Oxford Sustainable Community Strategy (affordable housing). The production of both plans will fulfil a key element of the Local Development Scheme and build on the strategic policies set out in the Oxford Core Strategy.

Recommendation(s): Council is asked to:

- 1: endorse the Main Modifications to the Barton Area Action Plan as part of the approved plan
- 2: endorse the Barton Area Action Plan (as amended by the Main Modifications) as a material consideration in determining planning applications
- 3: endorse the Addendum to the Sustainability Appraisal for the Barton Area Action Plan
- 4: endorse the Addendum to the Sustainability Appraisal for the Sites and Housing Plan
- 5: confirm the approach taken to the Ruskin College proposals as agreed at Council on 19th December 2011, in relation to the Barton AAP and Sites and Housing Plan.

Introduction

1. The Core Strategy allocates 'Land at Barton' as a strategic housing site. This site is a once in a generation opportunity to provide large numbers of new homes and associated facilities as a vibrant new community that forms part of Oxford. The development also offers the opportunity to extend the benefits to existing neighbouring communities in the form of access to the new facilities and services and better links to the rest of the City and the surrounding countryside. The site is being brought forward through an Area Action Plan (AAP), a Development Plan Document that will form part of the Local Development Framework for Oxford.
2. Over the summer of 2012, the Barton AAP has been progressing through the independent examination stage of its production. During the hearing sessions, the Planning Inspector, Dr Bussey, identified some potential changes to the AAP relating in particular to the treatment of the A40 and the provision of surface-level pedestrian crossings. She also asked the City Council to carry out an updated Sustainability Appraisal of proposals for development on Ruskin Fields in Old Headington in order to explicitly consider the various more recent technical studies provided by Ruskin College. These have been published for consultation and Council is requested to endorse them in advance of the further hearing sessions to commence on 21st September 2012.
3. The Sites and Housing Plan is following the Barton AAP through to examination. The examination hearings for the Sites and Housing Plan started on 10th September 2012.

Barton Area Action Plan

4. The Barton AAP has been produced over a two year period. It was approved at full Council on 19th December 2011. Council approved the Proposed Submission Barton AAP and its supporting documents for public consultation and, subject to the consultation, submit the AAP to the Secretary of State for public examination. At the same time the AAP was approved as a material consideration in determining planning applications.
5. The Barton AAP was submitted to the Secretary of State on 13th April 2012 and Dr Bussey was appointed as the Planning Inspector to examine the document. The hearing sessions of the examination commenced on 16th July 2012.
6. During the hearing sessions the Inspector identified some changes to the AAP that she considered should be advertised for public representations to be made on their soundness or otherwise. These have been published in the Schedule of Main Modifications dated July 2012 (Appendix A) and were consulted upon from 27th July 2012 to 7th September 2012.

7. As requested by the Inspector, the City Council also published an Addendum to the Sustainability Appraisal (SA) of the AAP regarding land at Ruskin College (the addendum also addressed some of the other Main Modifications) (appendix b) and an Addendum to the Sustainability Appraisal of the Sites and Housing Plan (appendix c). Representations have also been invited on these documents during the same period.
8. The consultation period was agreed with the Inspector on the final day of the original Barton hearings, in order that consultation could be completed ahead of an additional two Barton hearing sessions, which are due to be held on the Main Modifications and the issue of Ruskin College's proposals on 21st and 24th September 2012.

Main Modifications

9. The Main Modifications comprise proposed changes to the Barton AAP which the Inspector considered were major enough to warrant additional public consultation. There are 8 Main Modifications (appendix a) which relate to a range of topics covered in the AAP. The Inspector also asked the City Council to consider whether these changes require further sustainability appraisal work. Further sustainability appraisal is only required where the proposed changes may have significant impacts that have not previously been appraised. In many cases (5 out of 8) the City Council has considered that whilst the Main Modification provides additional detail to the policy, it does not have significant impacts that have not previously been appraised. The City Council has decided to carry out further sustainability appraisal work on Main Modifications MM1 (model policy), MM4 (policy BA1) and MM6 (policy BA7). This appraisal work is included in the Addendum to the Sustainability Appraisal (appendix b).
10. Council's attention is directed in particular to two of the Main Modifications which deal with the Inspector's concerns about Policies BA1: Transforming the ring-road, and BA7: Pedestrian and cycle links. In brief the Inspector expressed that she supported the City Council's aspirations for integrating the new development with neighbouring areas, but that she felt she had not seen enough evidence to feel comfortable with two aspects of the policies, namely the requirement for a 40mph speed limit (and houses facing the A40) and the provision of surface-level pedestrian crossings. The Inspector felt that making these aspects requirements of policy went beyond the evidence that was available and as such she requested that the City Council proposed some amendments to the policies to address these concerns.
11. As such, tracked changes to the policies were proposed as Main Modifications MM4 and MM6. These Main Modifications deal with what the City Council consider to be all of the Inspector's concerns and the County Council's concerns regarding the AAP's proposals for the treatment of the A40. The City Council has had on-going discussions

with the County Council, which has resulted in a Statement of Common Ground between the two authorities to deal with all outstanding concerns of the County Council in advance of the additional hearing sessions.

Sustainability Appraisal of Ruskin College's Proposals

12. Ruskin College made representations to the Planning Inspector that they were not satisfied that the Sustainability Appraisal process had been completed fully in respect of their site, particularly with regard to consideration of the various iterations of technical evidence the college had submitted to the City Council during the preparation of the AAP. A full sustainability assessment was undertaken at the Preferred Options stage (April 2011). However, it was agreed with the Inspector that the City Council would carry out an additional appraisal which takes account of the technical evidence that was submitted by Ruskin College between August and December 2011 (relating to a proposal for 175-193 dwellings) and in addition on information submitted up to and including June 2012 (related to a proposal for 69/70 dwellings). The Council considers that it has carried out this work in accordance with the Inspector's request.
13. This information has informed the new appraisal work that is included in the Addendum to the Sustainability Appraisal for the Barton AAP (Appendix b) Three options were appraised: option 1: do-nothing (i.e. no development); option 2: residential development of 175-193 dwellings; and option 3: residential development of 69/70 dwellings. On 22 July 2012, the Oxford Preservation Trust proposed an 'Option 4' as a modification to the AAP, namely that Ruskin Fields should be allocated as a 'Protected Open Space'. This would protect Ruskin Fields from development in perpetuity. However this option was not felt to be a reasonable alternative for the AAP taking into account the AAP's objectives and geographical scope as required by SA/SEA legislation.
14. The appraisal concluded:

“Option 1 (do nothing) assumes no development. The site and surroundings are likely to naturally change, for instance if Stoke Place is upgraded to accommodate more cycle and pedestrian movements, and establishment of the new pond at the site as part of a sustainable drainage scheme for the Ruskin College developments. However essentially the site would maintain its open character and its benefits for ecology.

Option 2 for a residential development of 150-193 dwellings would help to meet the city council's housing targets and improve local access to green areas. The integration of a small stream, pond and hedgerows in the proposed masterplan would be a positive use of existing landscape features. The creation of a 'green street' with a 'swale' could help to create a distinctive, rustic streetscape. The swale would also create a wildlife corridor.

However Option 2 would have significant negative impacts that cannot be managed through the detailed design and layout of the development including

 - *The density and height of development proposed would not support the role that Ruskin Fields play in the Old Headington Conservation*

Area, namely a rural character and wide open views in close proximity to the tightly enclosed village centre, and provision of views to the built-up part of the conservation area from outside its boundaries.

- *The placement of three- and four- storey blocks at the northern edge of the site is likely to result in the creation of an unduly prominent and intrusive building line within one of the key views identified in the conservation area appraisal.*
- *Development would have a direct impact on important hedgerows, six protected bat species and several important bird species.*
- *The development is sited within (relatively far) walking distance from good, frequent bus services. However, even so it would generate about 650 car trips over a 12 hour period, which would be channelled onto the residential streets branching off Foxwell Drive.*
- *The development could also affect Roman archaeology on the site, and increase runoff and air pollution.*

The impacts of Option 3 would be similar to but smaller than those of Option 2. It would be less visually intrusive, generate less traffic, and cause fewer problems of runoff and air pollution. It would provide significantly fewer new homes. However the scheme would still have significant visual impacts on a conservation area, and would still significantly affect the more ecologically sensitive parts of the sites (including hedgerows and bats).

In summary, development on the open parts of the site is constrained by the site's role as open green space within the Old Headington Conservation Area; and development near the hedges and trees is constrained by the site's ecological importance. As has been demonstrated both the larger and smaller developments would generate net negative impacts. As such, Option 1 (do nothing) is the preferred option.” (Conclusion of the Addendum to the SA for the Barton AAP)

15. For completeness, an Addendum to the Sustainability Appraisal for the Sites and Housing Plan regarding Ruskin College’s proposals has also been published (Appendix c). That sustainability appraisal work concluded that:
“Although the site scores positively in terms of housing, if developed (for either a small or large scheme), it would have, based on the evidence submitted, significant effects on the Old Headington Conservation Area and the biodiversity of the site. As such the SA has suggested that the preferred option for the site would be “do not allocate”. (Conclusion of the Addendum to the SA for the Sites and Housing Plan)

Ruskin College’s proposals

16. Ruskin College had proposed their land for development early in both the Barton AAP and the Sites and Housing Plan processes. It was decided that it would be prudent to carry out consultation on these proposals in order to gauge public opinion. As such it was considered useful the Preferred Options document for the AAP (May 2011) included a proposal put forward by Ruskin College for between 175 and 190 new homes on fields to the north of the College and south of the ring-road. The City Council was clear in the Preferred Options document that it was not

promoting development at Ruskin Fields but simply inviting the public to comment.

17. Further work was submitted by Ruskin College between the Preferred Options and Proposed Submission stages of the AAP. This was carefully considered by officers and it was recommended to Council that no policy be included in the AAP on the land in question. This issue was specifically referenced in the report to the Council meeting (19th December 2011) as follows:
“Since the Preferred Options consultation, Ruskin College have submitted further proposals together with supporting technical studies. However, the proposals and technical studies are not sufficiently robust to be included in the AAP. In particular, no workable vehicle access arrangement has been demonstrated and the proposals do not adequately reflect the requirement to protect and enhance the character and appearance of the Conservation Area. To include the proposals in the Barton AAP would present a risk to the soundness of the AAP, and could hold up delivery of homes on the Land at Barton to the north of the ring-road. Therefore no land at Ruskin Fields has been allocated for development in the AAP.” (Paragraph 13 of item 22)
18. Members will recall that at the meeting of 19th December 2011 Council debated both the Barton AAP and the Sites and Housing Plan and approved them both for public consultation, and subject to the consultation, submission to the Secretary of State for examination. At that meeting several members of the public made addresses regarding the issue of Ruskin College’s proposals including an address made in person by Professor Mullender, the Principal of Ruskin College. During the debate several amendments were proposed, one of which was to identify Ruskin Fields as a suitable site for housing. The minutes show that this proposed amendment was debated, voted on, and not adopted.

Sustainability Appraisal and concerns raised by Ruskin College

19. As outlined above, further sustainability appraisal work has been carried out on the proposals including taking account of recently submitted information that was not available at the time of the Council debate. The sustainability appraisal work has nonetheless concluded that the best option for the site in sustainability terms is the “do-nothing” option of no development as *“both the larger and smaller developments would generate net negative impacts”* (conclusion of the Addendum to the SA of the Barton AAP).
20. In its representations to the recent consultation, Ruskin College has responded to the findings of the sustainability appraisal. A full copy of Ruskin’s submission, together with all other representations, is now an examination document and can be accessed on the Council’s website at www.oxford.gov.uk/bartonaapexamination and www.oxford.gov.uk/sitesandhousingexamination. Ruskin’s central concern is that the addendum to the sustainability appraisal of the Barton AAP does not give a fair and unbiased indication of the potential impact of development on Ruskin Fields. The College points to seven

objectives for which a negative or significant negative impact is stated, and notes that in the sustainability appraisal for the AAP published in February 2012 no negative impacts were identified for the Barton strategic site north of the A40. Ruskin College considers that the City Council has not compared the two sites in a similar manner and the outcomes are very biased in favour of the Barton extension. It argues that, given that the character of the two sites is similar, consisting of semi-improved grassland with hedgerows, and that the Barton extension is significantly larger, the sustainability assessment can be given no credibility.

21. Ruskin College argues that the different scores given to the two sites mean that the assessment has not complied with the legal duty to properly evaluate the effects of alternatives on the environment, as required by EU law. It asks for further work to be carried out on the sustainability appraisal prior to discussing the merits of Ruskin Fields at the examination.
22. Officers do not agree with these arguments. The relevant sustainability appraisal to compare the Barton and Ruskin sites is the sustainability appraisal on Barton at the Core Strategy stage, not the AAP. The strategic site at Barton was allocated in the Core Strategy, and it was during the preparation of the Core Strategy that the principle of development on that site was assessed. The sustainability appraisal for the Barton AAP therefore considered the impacts of each individual policy option, not the overall principle of allocation, because of the fact that this site was already allocated and could otherwise have come forward without any additional policy guidance, based on Policy CS7 in the Core Strategy.
23. At the Core Strategy stage, negative impacts were identified in the sustainability appraisal for five objectives, four of which are also identified as negative for Ruskin Fields. The objectives that have been identified as negative for Ruskin but not for the Barton strategic site at Core Strategy stage relate to climate change, historic environment/countryside and using natural resources sustainably. The main reasons for this are that there are material differences between the two sites; the strategic site, unlike Ruskin Fields, is not in a Conservation Area, and its greater size provides opportunities for potential benefits like new bus routes and a district heating scheme that would not exist on a smaller development. It is true that the Core Strategy assessment identified far more positive impacts than has been identified for Ruskin, but this reflected our assessment of the potential wider regeneration benefits of the Barton site.
24. The point about EU law in terms of assessment of alternatives is not considered to be relevant because the assessment of Barton against reasonable alternatives was done in the Core Strategy. Development on the Ruskin Fields site has been considered on its own merits, not as an alternative to the Barton extension.

25. In addition, it is important to recognise that whilst the Sustainability Appraisal process has an important role when making decisions; it is only one of a range of tools available to the City Council when formulating planning policy. This was raised on a number of occasions at the examination, with the Inspector emphasising the importance of using the range of tools available, including for example the technical evidence base and the results of public consultation, when coming to policy decisions.

Planning considerations

26. It is acknowledged that Ruskin has carried out further technical evidence. In relation to transport, the County Council has indicated that the College have now demonstrated a workable transport solution for the smaller development option, albeit that this access arrangement off Foxwell Drive would result in traffic going through residential areas in Northway. This would equate to an additional 300 vehicle movements over a 12-hour period. Traffic movements during the am and pm peak periods would be around 30-40 vehicle movements an hour. In relation to the larger scheme, the County Council has not indicated that there is any workable transport solution. The larger scheme would generate approximately 650 trips over a 12-hour period, with some 65-75 vehicle movements an hour in peak periods.
27. There remain strong concerns about the planning merits of allocating Ruskin fields for development in either plan, particularly in relation to the impact on the historic environment and landscape character. The Old Headington Conservation Area appraisal identified the importance of views across the Ruskin fields to the distinctive character of the Conservation Area. It noted that *"the green wedge of space that it creates in these views, running between the built up Barton and Northway estates, illustrates the distinctiveness of the character of Old Headington from its surrounding communities."*
28. In planning as well as sustainability terms, these fields provide an important open setting to the tightly knit historic core of Old Headington, and a key element of views into and out of the Conservation Area. Development at the northern edge of the site, particularly of three or four storeys, would be likely to create an intrusive building line within one of the key views identified in the Conservation Area appraisal. There are also ecologically important hedgerows across and bounding the site which are difficult to avoid disturbing in any development scheme.
29. In such an environmentally sensitive location, the City Council would discourage outline planning applications because a decision would be likely to turn on how the details of any scheme related to the statutory duty to preserve and enhance the character of the Conservation Area. Allocating a site in the plan led system would give extremely strong support to any future planning application, albeit that it would not bind the

Council to grant permission for any specific scheme. If allocated in the Sites and Housing Plan, this would be the only greenfield site allocated within a Conservation Area. Other similar greenfield sites in Conservation Areas that were proposed at the initial call for sites were rejected at the first stage on the grounds that development was unlikely to be possible without a significantly negative effect on the respective Conservation Areas. Ruskin Fields was taken forward to the next stage only on the basis that we had some further information, compared to those other sites, which enabled us to consider its merits further.

30. Ruskin College has argued that the location of its site provides a potential way of integrating development of the strategic site north of the A40 with the rest of the city. While development of this site could, in principle, help to achieve greater integration benefits, this has been compromised by the fact that access will only be via Foxwell Drive. In practice, this would be a cul-de-sac development. In any event, as a result of the changes highlighted earlier to policies BA1 and BA7 of the AAP, the potential functional relationship between this site and the main strategic site has been diminished.
31. In relation to public consultation, we have taken account of comments received throughout the plan production process. At the Preferred Options stage only 27% of respondents said that they supported Ruskin's larger proposal. With 29% supporting a smaller development. The strongest opposition was from the communities most affected, namely in Old Headington (95% of respondents) and Northway (74% of respondents), with relatively more support from Barton and from other areas of the city.
32. A summary of the results of the consultation carried out into the addendums to the sustainability appraisals for the Barton AAP and the Sites and Housing Plan will be published on the City Council's website as examination documents, at the same weblink as specified in paragraph 20 of this report. Given the relatively technical nature of this consultation, it is not surprising that only some 65 responses have been received in total. Nonetheless a number of residents in Old Headington and Northway have taken the opportunity to send in letters of objection relating to Ruskin Fields, primarily on the grounds of impact on the setting of the Conservation Area, loss of green space or traffic concerns. There were also a few expressions of support for development, primarily on grounds of housing need.
33. In light of the conclusions of the additional sustainability appraisal work, the views of affected communities and the planning concerns outlined above, Council is asked to confirm the approach that was originally agreed in the meeting of 19th December 2011, in not identifying the Ruskin land for development.

Level of risk

34. Should Members decide to include the Ruskin proposals in the Barton AAP or Sites and Housing Plan at this stage, this would be likely to necessitate a delay to the programme as follows:
 - a. the drafting of a policy
 - b. 6-week public consultation
 - c. analysis of responses
 - d. an additional hearing session
 - e. finalising of Inspector's Report
 - f. adoption
35. An additional hearing session would need to be held which could not take place (given the earlier stages) until at least December or possibly January, and the Inspector's availability would need to be established. This would mean that the Inspector's Report would not be finalised and received until February or March, delaying adoption of the AAP until around April 2013.
36. A decision to include the site in the Sites and Housing Plan would also result in a delay of a similar scale, although it is likely that a period of further consultation may be needed on other main modifications to the Sites and Housing Plan in any event. Those other main modifications would probably not warrant extra hearing sessions in themselves.
37. The contribution of new housing from the Land at Barton and associated regeneration is a key priority for the City Council, fundamental to achieving the objectives of the Oxford Corporate Plan, the Sustainable Community Strategy, the Core Strategy and the Regeneration Framework for Oxford. Failure to deliver housing at the scale intended could lead to significant problems in meeting the City's housing targets.
38. In the view of Ruskin College, given its concerns about the sustainability appraisal summarised earlier in this report, the Inspector may find the sustainability appraisal, and hence the Barton AAP, unsound. This would result in a major delay to the Barton development. While officers do not share this view, Members should be aware of the College's position

Climate change and environmental impact

39. The Barton AAP objectives seek to encourage a low carbon lifestyle by: encouraging people to walk, cycle and use public transport; providing new homes and buildings that use energy and water efficiently; and, by making effective use of renewable and low-carbon energy. The Sustainability Appraisal has considered the effects of the AAP policies on climate change and the environment. Overall, the policies are considered to have a beneficial impact on climate change.

Equalities impact

40. An Equalities Impact Assessment has been carried out for the Barton AAP. A key theme of the Barton AAP is regeneration. Regeneration can help to tackle disparities in life chances by transforming deprived areas and improving the lives of those living in and around them. The Equalities Impact Assessment shows that the policies and proposals in the Barton AAP will help address existing inequalities by increasing the availability of affordable housing, adding to the range of community and educational facilities and by linking people to economic opportunities. There is no evidence that there will be significant negative impacts. The Equalities Impact Assessment is available on the City Council's website at:
<http://www.oxford.gov.uk/Library/Documents/Barton%20AAP/Barton%20AAP%20Equalities%20Impact%20Assessment.pdf>

Financial implications

41. The costs associated with the production of the Barton AAP and Sites and Housing Plan are being met through the current resources of the Planning Policy team and budget. The AAP has a strong emphasis on deliverability and the policies reflect evidence on viability. Barton LLP will deliver the infrastructure to bring forward the strategic development site. The joint venture company is also designed to maximise flexibility, with the City Council able to take a share in the value created and recycle returns into the development.

Legal Implications

42. Following examination of the AAP, the Inspector may find the document 'unsound'. The consequence of a finding of unsoundness is that the City Council will be unable to adopt the AAP. Following adoption, a Development Plan Document can be legally challenged.

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List of appendices:

- Appendix a – Main Modifications to the Barton Area Action Plan
Appendix b – Addendum to the Sustainability Appraisal of the Barton Area Action Plan
Appendix c – Addendum to the Sustainability Appraisal of the Sites and Housing Plan

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Local Development Framework

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Barton Area Action Plan

Main Modifications



27th July 2012

| Main Modification number | Policy/ Paragraph/ Page | Detail of Main Modification | Reason for Change | Further Consultation Required? | Further SA Required? | Other notes |
|--------------------------|-------------------------|---|--|--------------------------------|----------------------|---|
| MM1 | Spatial Vision 2.5 | <p>Insert new text: <u>“National Planning Policy Framework</u> <u>Policies in Local Plans should follow the approach of the presumption in favour of sustainable development so that it is clear that development which is sustainable can be approved without delay. All plans should be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally.”</u></p> <p>And insert new model policy:</p> <div style="border: 1px solid black; padding: 5px;"> <p><u>Policy MP1:</u> <u>When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will work proactively with applicants jointly to find solutions which mean that applications for sustainable development can be approved where possible, and to secure development that improves the economic, social and environmental conditions in the area.</u></p> <p><u>Planning applications that accord with Oxford’s Local Plan* (and, where relevant, with neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.</u></p> <p><u>Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise, and unless:</u> - Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or - Specific policies in that Framework indicate that development should be restricted.</p> </div> <p><u>*Oxford’s Local Plan comprises of the Core Strategy, West End Area Action Plan, saved policies from the Oxford Local Plan 2001-2016. When this Plan and the Sites and Housing Plan are adopted they will form part of Oxford’s Local Plan.</u></p> | Factual update to reflect National Planning Policy Framework | Yes | Yes | Previously referenced as EC34; and supersedes EC5 |

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| MM2 | Map 1 | <p>Amend map:</p> <p>a. to show boundary of Strategic Site</p> <p>b. amend description of dark green line on Key to read 'Existing pedestrian <u>and/or</u> cycle ways'</p> <p>c. reduce size of arrows used to depict 'Access to countryside'</p> <p>d. correct depiction of link through centre of site (past substation) from a lime green dotted line, to a dark green line as it is an existing pedestrian and/or cycle way.</p> <p><i>See new Map 1 appended to this schedule</i></p> | <p>a. Inspector's request</p> <p>b. to remove ambiguity</p> <p>c. to remove ambiguity</p> <p>d. to correct factual error</p> | Yes | No | Previously referenced (in part) as PPC1 and EC6 |
| MM3 | New para. after 4.1 | <p>Insert new paragraph:</p> <p><u>"This Area Action Plan does not allocate any sites within the Old Headington Conservation Area for development. Any development proposals that come forward within the conservation area would have to demonstrate to the City Council that the statutory requirement to preserve or enhance the conservation area would be satisfied. The City Council will take the same approach when considering any development proposals in the Old Headington Conservation Area as it would in conservation areas elsewhere in the city. Any such proposals will be assessed against the relevant policies of Oxford's Local Plan particularly policy CS18 of the Core Strategy and saved policies of the Oxford Local Plan 2001-2016; in addition the Conservation Area Appraisal would be a material consideration."</u></p> | Inspector's request | Yes | No | |
| MM4 | BA1 | <p>Amend Policy and supporting text:</p> <p>Section 5 Integration with surrounding areas and the rest of Oxford</p> <p>It is important that the new neighbourhood feels part of Oxford.</p> <p>The place-shaping policies in this Plan aim to foster the sense of community that will be generated by people living in the new and existing homes. The A40 ring-road will be transformed <u>to reduce the sense of segregation it currently creates. into a street that runs through the city rather than dividing it.</u> There will be excellent new links across the ring-road for pedestrians and cyclists, and improved public transport links. The local centre and community facilities will be easily accessible and new homes will be well related to existing homes in Barton. <u>The City Council will work closely with the Highway Authority in pursuit of these aims.</u></p> <p>Transforming the A40 ring-road</p> <p>5.1 The A40 ring-road runs immediately to the south of the strategic development site, forming part of the strategic highway network. Our policy for this stretch of the ring-road is crucial to achieving the Plan's wider vision and objectives.</p> <p>5.2 Comprising dual carriageway with a maximum speed of 70 mph, the ring-road creates a sense of severance and isolation. It forms a noisy barrier physically separating the strategic development site from communities in</p> | To address concerns of the Inspector | Yes | Yes | |

| | | | | | |
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| | | <p>Northway, Headington and the rest of Oxford. Leaving this stretch of the ring-road as it is would make it much harder to integrate old and new. Change would offer opportunities to:</p> <ul style="list-style-type: none"> ▪ reduce noise levels for existing communities ▪ make best use of land, by increasing the amount of land available for development ▪ improve connectivity. <p>5.3 The ring road will be <u>Our aspiration is to transformed the ring road</u> to ensure it is no longer a noisy and visually dominating physical barrier that separates Barton and its surroundings from the rest of the city. This will be <u>We will seek to achieved this</u> in the following three ways:</p> <ul style="list-style-type: none"> ▪ Traffic speeds will be reduced to a maximum of 40 mph. Lower traffic speeds will reduce noise levels for the new development as well as for those living in surrounding communities. The amount of developable land <u>would</u> will be increased by allowing development to take place closer to the ring-road. The lower speeds <u>would</u> will allow traffic management measures in the form of a new signal-controlled junction or roundabout on the A40 ring-road and multiple safe and easy-to-use crossings for pedestrians and cyclists. <u>Physical measures to the A40 to slow down traffic could also include changes to lane widths, the use of surface materials, street lighting and signage</u> Together these measures <u>would</u> will help to transform the look, feel and operation of this stretch of the ring-road. ▪ New development <u>could</u> will be built facing the northern side of the ring-road. To avoid any sense of separation between the new neighbourhood and the rest of Oxford, new homes will be built facing onto the ring road. There will be <u>In such cases</u> a parallel road <u>would</u> allowing access to the properties facing the ring-road. These frontages of new homes will be along the southern edge of the strategic development site (though not necessarily its entire length) and in Barton itself. <u>as shown in illustrations 1 and 2</u> ¹show how proposed development could face onto the ring road on the strategic development site. ▪ The <u>landscaping of the</u> central reservation along this stretch of the ring-road <u>could</u> will be <u>reviewed</u> re-landscaped. The central reservation is well planted with mature vegetation. This forms another physical – albeit green – barrier between the strategic development site and the rest of Oxford. The planting <u>could be</u> reviewed to <u>support integration.</u> should re-landscaped to be more in keeping with a street running through the city. | | | |
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| | | <p>5.4 The changes to the ring-road must consider the setting of the Old Headington Conservation Area, which lies to the south of the ring-road.</p> <p>¹ Illustrations are indicative</p> <div style="border: 1px solid black; padding: 10px;"> <p>Policy BA1: Transforming the ring-road</p> <p>Traffic management <u>and safety</u> measures will be put in place and design principles applied to the A40 ring-road between the western approach to the new junction/roundabout and the Headington roundabout to secure a reduction in traffic speeds to a maximum of 40 mph.</p> <p>Planning permission will only be granted for a layout for the strategic development site that maximises the scope to provide homes facing the northern side of the ring road. Such development must not be accessed direct from the ring road.</p> <p>The <u>landscaping of the</u> central reservation may <u>will</u> be <u>reviewed re-landscaped</u> to reduce the density of the existing planting.</p> <p>Where relevant, <u>any</u> development facing the ring-road and <u>any review of the landscaping re-landscaping</u> of the central reservation must consider views into and out of the Old Headington Conservation Area.</p> <p><u>There may be an opportunity to provide homes facing the northern side of the ring-road. Such development must not be accessed direct from the ring-road.</u></p> </div> | | | | |
| MM5 | BA2 | <p>Additional wording at end of policy:</p> <p><u>'To minimise disruption to sports provision the groundworks needed to re-configure the recreation ground could take place in the off-season.'</u></p> | Inspector 's request – for clarity | Yes | No | Previously referenced as EC7 |
| MM6 | BA7 | <p>Amend Policy and supporting text:</p> <p>Pedestrian and cycle links</p> <p>5.31 The ring-road currently imposes a significant barrier for pedestrians and cyclists, with only one existing grade-separated (differing levels) crossing point – a subway to the south of Barton, which provides a link to Headington.</p> <p>5.32 To improve integration and permeability and to promote maximum usage, a network of safe and easy-to-use pedestrian and cycle routes along desire lines (the routes people are likely to take, with or without a formally designated path) is needed to connect the new homes with facilities in the new neighbourhood and link the new development to its surroundings in Barton, Headington, Northway and the countryside</p> | To address concerns of the Inspector | Yes | Yes | |

beyond Oxford, and to the rest of the city. There will be multiple safe and convenient pedestrian and cycle links across ~~crossing points on~~ the ring-road.

5.33 The existing footpath that runs south-north across the strategic development site (and then beyond into the countryside in South Oxfordshire) could ~~will~~ be re-connected with Stoke Place, either as a surface-level crossing or bridge, linking the footpath with the public bridleway and byway that continues south into Old Headington along Stoke Place. ~~The~~ A re-connected link would ~~will~~ provide the new development with a direct pedestrian and cycle route to the shops and other facilities in Headington, the John Radcliffe Hospital and Cheney Secondary School. It would ~~will~~ open up access to the countryside in South Oxfordshire for those living in Headington. Stoke Place would ~~will~~ need to be upgraded to an appropriate standard, with changes to the surface, thinning of trees and vegetation and installation of sensitive street lighting. The nature of the changes to Stoke Place, together with the design, ~~and~~ siting and type of the crossing, should respect the character of Old Headington Conservation Area.

5.34 The new vehicle junction or roundabout on the ring-road will include pedestrian and cyclist crossing phasing and facilities. The new development is an opportunity to improve the existing crossing to the south of Barton. This could be in the form of further improvements to the subway or a parallel surface-level crossing. There could be at least one other new pedestrian and cycle link across ~~crossing of~~ the ring-road, ~~linking the strategic development site with its surroundings.~~ One potential location ~~crossing point~~ is from the new development to Foxwell Drive in Northway either as a surface-level crossing or bridge, which would provide direct access to the wider cycle network and the city centre. Map 6 shows how the strategic development site will be accessed by vehicles, pedestrians and cyclists.

Policy BA7: Pedestrian and cycle links

New direct, safe and attractive cycle and pedestrian links will be provided as part of the strategic development, including:

- ~~re-connecting Stoke Place bridleway with the existing footpath running north-south across the strategic development site~~
- ~~upgrading Stoke Place to an appropriate standard for a cycle route and footpath and in a manner that is sensitive to Stoke Place's role and character in the Old Headington Conservation Area~~
- a crossing of the A40 ring-road included in the new junction or roundabout
- enhancement of the existing crossing between Barton

| | | | | | | |
|------------|--|---|-----------------------------------|-----|----|----------------------------|
| | | <p>and Headington</p> <ul style="list-style-type: none"> ▪ links between the new development and existing rights of way in surrounding countryside ▪ giving priority to walking and cycling routes in the development, including connections to key destinations such as the local centre, community hub and Barton and the links across the A40 ring-road ▪ a street network that is designed to be fully cycle and pedestrian friendly. <p><u>There may be an opportunity to re-connect Stoke Place bridleway with the existing footpath running north-south across the strategic development site. Any crossing, whether at-grade or via a bridge would need to ensure safety for all users. It would require the upgrading of Stoke Place to an appropriate standard for a cycle route and footpath in a manner that is sensitive to Stoke Place's role and character in the Old Headington Conservation Area.</u></p> | | | | |
| MM7 | BA13 3 rd bullet point | <p>Additional wording at end of 3rd bullet point:</p> <p>“The development’s scale, form, character and design must respect the site’s topography, natural features and setting of the site, including the impact on the Old Headington Conservation Area <u>and its setting.</u>”</p> | For clarity | Yes | No | Previously referenced EC37 |
| MM8 | New Annex | <p>Addition:</p> <p><u>Annex 3 - Housing Trajectory.</u></p> <p>See new appended to this schedule</p> | Inspector’s request – for clarity | Yes | No | Previously referenced EC20 |

Note on requirement for further consultation and sustainability appraisal

All the changes listed above are considered to be Main Modifications and as such require further consultation. This consultation period will run for 6 weeks beginning on 27th July 2012 and closing on 7th September 2012.

An assessment has been made as to whether the Main Modifications require further sustainability appraisal work. Further sustainability appraisal is only required where the proposed changes may have significant impacts that have not previously been appraised. Where indicated above that no further sustainability appraisal work is required, the City Council has considered that whilst the Main Modification provides additional detail to the policy, it does not have significant impacts that have not previously been appraised.

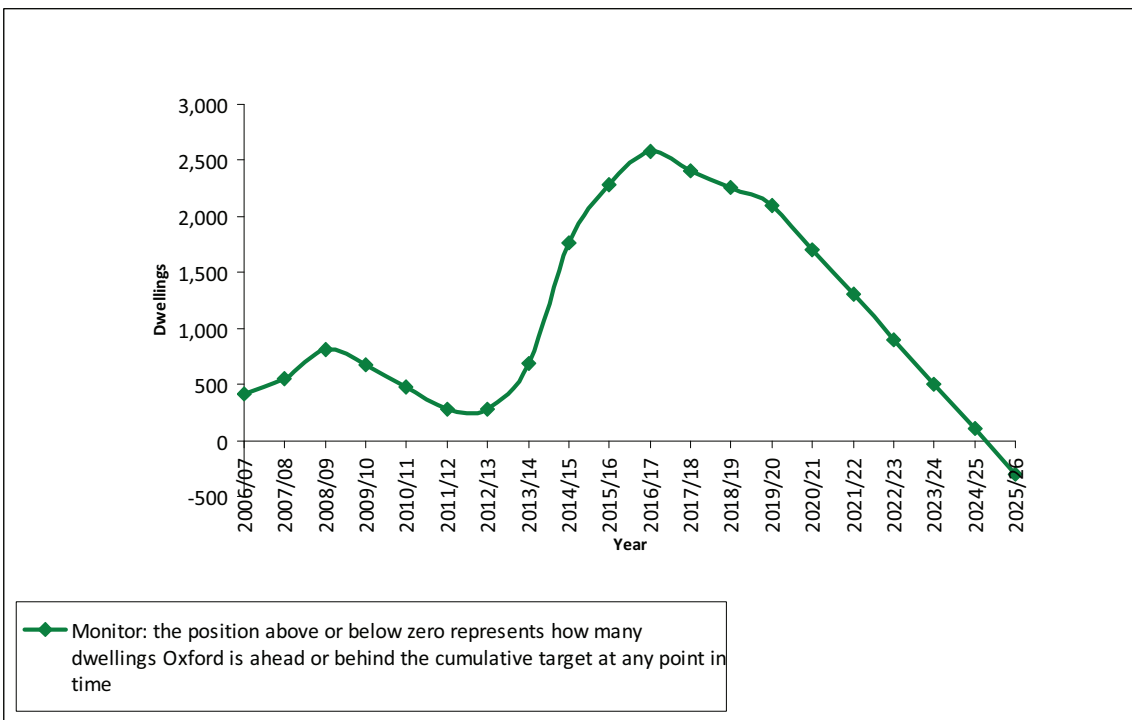
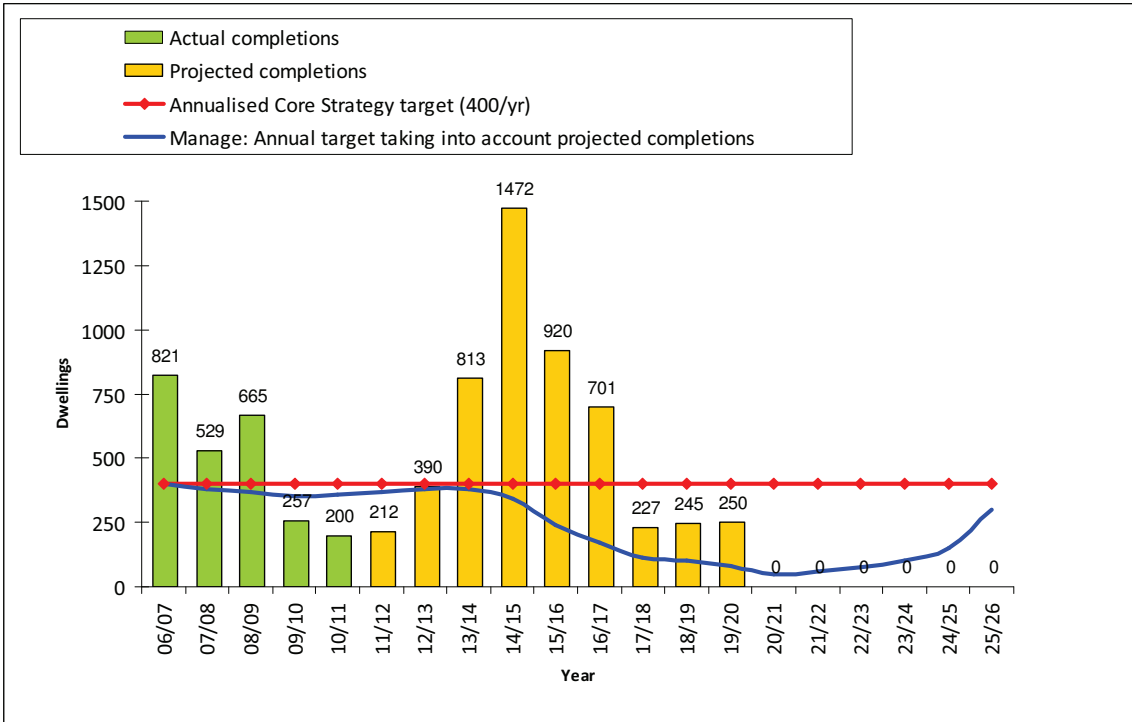
The City Council has decided to carry out further sustainability appraisal work on Main Modifications MM1, MM4 and MM6 in the spirit of best practise and the active consideration of sustainable and feasible options. This further work can be found in the Addendum to the Sustainability Appraisal for the Barton Area Action Plan (CD7.23).



- Development Site Boundary
- AAP Area
- Bayswater Brook
- A40
- Key Routes
- Indicative Location of Signalised Junction or Roundabout
- Existing Pedestrian and/or Cycleways
- Potential Additional Linkages for Pedestrians and Cycles
- Main Vehicle Access to Strategic Development Site
- Potential Additional vehicle access point
- Indicative Route for Primary Street
- Proposed Pedestrian and Cycle Crossing
- Access to Countryside
- Allotment Association Land
- Linear park
- Open Space
- Potential Frontages
- Existing Pedestrian subway

Annex 3 Housing Trajectory

The housing trajectory demonstrates the position based upon the Strategic Housing Land Availability Assessment (Dec 2011) with the addition of sites proposed to be allocated in the Sites and Housing Plan. Barton falls within years 2014/15 and 2019/20. No allowance has been made for windfalls.



City Development

Addendum to the Sustainability Appraisal for the Barton Area Action Plan

July 2012

www.oxford.gov.uk



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Introduction

The Inspector appointed to examine the Barton Area Action Plan has identified some changes (Main Modifications) to the AAP, that she considers should be advertised for public representation to be made on their soundness or otherwise. She has asked the City Council to consider whether these changes require further sustainability appraisal work. In addition she has asked the City Council to carry out further sustainability appraisal work regarding land at Ruskin Fields.

Consideration of necessary further SA work

The Main Modifications are set out in a schedule at CD7.22. An assessment has been made as to whether these Main Modifications require further sustainability appraisal work. Further sustainability appraisal is only required where the proposed changes may have significant impacts that have not previously been appraised. The Schedule of Main Modifications indicates which of those proposed changes the City Council considers require further sustainability appraisal work and those where none is required. In many cases (5 out of 8) the City Council has considered that whilst the Main Modification provides additional detail to the policy, it does not have significant impacts that have not previously been appraised.

The City Council has decided to carry out further sustainability appraisal work on Main Modifications MM1 (model policy), MM4 (policy BA1) and MM6 (policy BA7) in the spirit of best practice and the active consideration of sustainable and feasible options.

The structure of this addendum

The further sustainability appraisal work on Main Modifications MM1, MM4 and MM6 can be found in the following assessment tables. Also included in this addendum is the further sustainability appraisal work on the land at Ruskin College.

This addendum to the Sustainability Appraisal Report for the Barton Area Action Plan should be read in conjunction with the main Sustainability Appraisal of the AAP (CD1.10) dated February 2012, which can be viewed on the City Council's website at: www.oxford.gov.uk/bartonaapexamination

Assessment of MM1: Model Policy

Main Modification 1 deals with the proposed inclusion of the model policy.

The Planning Inspectorate has recommended that the Barton AAP should include a policy that refers to the National Planning Policy Framework (NPPF). The proposed policy is:

“When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.

Planning applications that accord with the policies in Oxford's Local Plan will be approved without delay, unless material considerations indicate otherwise.*

Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise – taking into account whether:

- *Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or*
- *Specific policies in that Framework indicate that development should be restricted.*

* Oxford's Local Plan comprises the Core Strategy, West End Area Action Plan, and saved policies from the Oxford Local Plan 2001-2016. When this plan and the Sites and Housing Plan are adopted, they will form part of Oxford's Local Plan. »

The great majority of the wording of this proposed policy comes directly from the National Planning Policy Framework. Since the NPPF constitutes guidance for local planning authorities and is anyway a material consideration in determining planning applications, the policy seems to simply repeat other policy and is arguably an unnecessary duplication.

In three ways, the national model policy differs slightly but significantly from the NPPF: these are shown in 1. green, 2. blue and 3. orange in the table below.

1. The national model policy's requirement to "approve proposals wherever possible" is less measured and subtle than the NPPF's requirement to "approve applications for sustainable development where possible": it does not include the qualifier of 'sustainable development', and 'wherever' is more strenuous and exigent than 'where'.
2. The national model policy's requirement to approve proposals that accord with "the policies in Oxford's Local Plan" is again less subtle than the NPPF's requirement that it accord with "the development plan". A Local Plan's introduction and explanatory text provide information that explains and modulates the plan's policies, and so a plan should be read as a whole when considering development applications, not just as a list of individual policies.
3. The national model policy states that where plan policies are not relevant or out of date, planning permission should be granted "taking into account" benefits versus costs etc.; the NPPF's wording is a stronger and more unequivocal "unless".

On a minor note, the NPPF includes no requirement to 'always' work proactively with applicants.

| Comparison of the national model policy and the NPPF | |
|---|--|
| National model policy | National Planning Policy Framework |
| When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework . | "Local planning authorities should approach decision-taking in a positive way to foster the delivery of sustainable development" (para. 186). "At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development " (para. 14) "The National Planning Policy Framework constitutes guidance for local planning authorities and decision-takers both in drawing up plans and as a material consideration in determining applications" (para. 13) |
| It will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible , and to secure development that improves the economic, social and environmental conditions in the area . | "Local planning authorities should approach decision-taking in a positive way... Local planning authorities should look for solutions rather than problems, and decision-takers at every level should seek to approve applications for sustainable development where possible . Local Planning authorities should work proactively with applicants to secure developments that improve the economic, social and environmental conditions of the area " (para. 186-187) |
| Planning applications that accord with the policies in Oxford's Local Plan* will be approved without delay , unless material considerations indicate otherwise. | "Proposed development that accords with an up-to-date Local Plan should be approved, and proposed development that conflicts should be refused unless other material considerations indicate otherwise" (para. 12) "For decision-taking this means: ¹⁰ approving development proposals that accord with the development plan without delay <small>10. Unless material considerations indicate otherwise,,</small> "Development that is sustainable should go ahead, without delay – a presumption in favour of sustainable development that is the basis for every plan, and every decision" (Ministerial foreword) |
| Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise – taking into account whether: <ul style="list-style-type: none"> • Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or • Specific policies in that Framework indicate that development should be restricted. | "For decision-taking this means: ^{10...} Where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless: <ul style="list-style-type: none"> • any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or • specific policies in this Framework indicate development should be restricted. <small>10. Unless material considerations indicate otherwise,,</small> (para. 14) |

To be fully consistent with the NPPF – which, as noted above, would essentially constitute a duplication of policy – the national model policy should be rephrased as follows:

“Policy MP1: When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will ~~always~~ work proactively with applicants jointly to find solutions which mean that ~~proposals~~ applications for sustainable development can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.

Planning applications that accord with ~~the policies in~~ Oxford's Local Plan will be approved without delay, unless material considerations indicate otherwise.*

Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise – ~~taking into account whether and unless~~:

- Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or*
- Specific policies in that Framework indicate that development should be restricted.*

** Oxford's Local Plan comprises the Core Strategy, West End Area Action Plan, and saved policies from the Oxford Local Plan 2001-2016. When this plan and the Sites and Housing Plan are adopted, they will form part of Oxford's Local Plan. »*

As such, this policy text has been included in the Schedule of Main Modifications as MM1.

Assessment of MM4 and MM6: Policies BA1 and BA7

Main Modifications MM4 and MM6 propose some changes to the policies and supporting text of BA1 and BA7. This section of the addendum to the Barton Sustainability Appraisal assesses those proposed changes.

At the Preferred Options stage a range of options, as set out below were assessed for the treatment of the A40 Ring Road and Cycle and pedestrian links across the A40. The preferred options led to Policy BA1 and BA7 respectively.

Treatment of the A40 Ring Road

- Option 1 (do nothing)

This option represents the 'do nothing' approach. It makes no change to the ring-road and the speed of traffic using it, which allows speeds of up to 70 mph. The presence of the ring road does physically separate this area from the rest of the city and leads to the creation of a sense of isolation. The high traffic speeds cause problems in terms of noise and restrict movement across the A40. Would require a noise buffer to mitigate the impact on future residents, which takes up part of the potential development site.

- Option 2 (reduce traffic speed to 40mph)

The lower speeds would reduce the noise for existing and future residents. It reduces the need for a noise barrier to act as a buffer. Potentially increases the amount of land available for development on the site. The option does not however make a significant contribution to reducing the role of the A40 as a barrier and therefore does little to improve the integration of the new development.

- Option 3 (create street frontage)

This option provides a significant reduction in the speed of traffic on the ring road. This brings major benefits in reducing noise levels and avoiding the need for mitigation measures such as noise buffers. It also allows more land to be developed for residential and offers opportunity to create a new street frontage; which could positively contribute to breaking the barrier of the A40 and properly integrating this new development with rest of the city. (Preferred option)

Cycle and pedestrian links across A40

- Option 1 (access as part of signal controlled junction)

This option provides a pedestrian and cycle crossing through a new signalised controlled junction. (Part of Preferred option with option 3)

- Option 2 (Foxwell Drive crossing)

This option provides a new crossing from the development site through to Foxwell Drive. This has positive benefits in providing good access to the John Radcliffe Hospital and linking to the wider cycle network.

- Option 3 (Stoke Place)

This option provides a new link to the Stoke Place bridleway. It offers the potential for a pedestrian and cycle link from the new development to Headington and through to the John Radcliffe and Oxford Brookes. It does offer significant opportunity to improve links between Barton and the local area creating greater accessibility. Will require provision of a new pedestrian and cycle crossing. The visual impact of the bridge requires sensitive design given location adjacent to Conservation Area. (Part of Preferred option with option 1)

- Option 4 (Barton Lane)

This option provides a new crossing between land adjacent to Barton and the development site. It offers the potential to provide an alternative link for a pedestrian and cycle link from the new development to Headington and through to the John Radcliffe and Oxford Brookes. It does offer significant opportunity to improve links between Barton and the local area creating greater accessibility.

- Option 5 (no change)

This option relies on Policy CS7, which requires the delivery of access improvements in principle. It does however provide no details to show spatially where and what type of improvements could potentially be made.

| Predicting the effects of the changes to Policy BA1 | | | | |
|--|--------------------------------------|--|---|---|
| Treatment of the A40 Ring Road | Option 1 Leave ring-road as it is | Option 2 Amended Policy BA1 reduce speed (unspecified limit) with potential for some frontage development | Option 3 Submission Policy BA1 Street with new frontages & lower speed 40 mph | Comments |
| SA Objectives | | | | |
| Objective 1: to reduce the risk of flooding and the resulting detriment to public well-being, the economy and the environment | - | - | - | |
| Objective 2: to encourage urban renaissance by improving efficiency in land use, design and layout | X | Depends on implementation √X | Makes positive contribution to urban renaissance √ | |
| Objective 3: to meet local housing needs by ensuring that everyone has the opportunity to live in a decent, affordable home | - | Depends on implementation √X | Housing Design and speed of traffic contributes to better quality environment for housing √√ | |
| Objective 4: to improve the health and well-being of the population and reduce inequalities in health | X | V? | V | Lower speed of traffic reduces air pollution and noise levels. Reducing the speed limit to 40mph is likely to result in a reduction of noise levels of around 4.8/4.9dB. Reducing the speed limit to 50mph would reduce noise levels by about 2.4/2.5 dB. |
| Objective 5: to reduce poverty and social exclusion | - | Depends on implementation √X | Integrates Barton with rest of the city √ V | |
| Objective 6: to raise educational achievement levels and develop the opportunities for everyone to acquire the skills needed to find and remain in work | - | - | - | |
| Objective 7: to reduce crime and the fear of crime | - | - | - | |

| Predicting the effects of the changes to Policy BA1 | | | | |
|---|---|--|---|---|
| Treatment of the A40 Ring Road | Option 1 Leave ring-road as it is | Option 2 Amended Policy BA1 reduce speed (unspecified limit) with potential for some frontage development | Option 3 Submission Policy BA1 Street with new frontages & lower speed 40 mph | Comments |
| SA Objectives | | | | |
| Objective 8: to create and sustain vibrant communities | X X | √ | √√ | |
| Objective 9: to provide accessible essential services and facilities | A40 presents a physical barrier to integration X | Level of accessibility will depend to a large degree on implementation √X | Promotes integration of Barton √ | |
| Objective 10: to make opportunities for culture, leisure and recreation readily accessible | A40 presents a physical barrier to integration X | Level of accessibility will depend to a large degree on implementation √X | Promotes integration of Barton √ | |
| Objective 11: to reduce air pollution and ensure air quality continues to improve | X X | √ | √√ | Lower speed of traffic reduces air pollution |
| Objective 12: to address the causes of climate change through reducing emissions of greenhouse gases, and ensure Oxford is prepared for associated impacts | X | √ | √ | |
| Objective 13: to conserve and enhance Oxford's biodiversity | - | - | - | |
| Objective 14: to protect and enhance and make accessible for enjoyment Oxford's countryside and historic environment | - | - | - | |
| Objective 15: to reduce road congestion and pollution levels by improving travel choice, shortening | - | Depends on implementation | Positive and negative impacts | Journey times along the A40 between Thornhill Park and Ride and Marston interchange will increase by approximately 1 – 1.5 minutes in the peak periods if the speed limit were reduced to |

| Predicting the effects of the changes to Policy BA1 | | | | |
|---|--------------------------|--|--|---|
| Treatment of the A40 Ring Road | Option 1 | Option 2 | Option 3 | Comments |
| SA Objectives | Leave ring-road as it is | Amended Policy BA1 reduce speed (unspecified limit) with potential for some frontage development | Submission Policy BA1 Street with new frontages & lower speed 40 mph | |
| length and duration of journeys and reducing the need to travel by car/lorry | | vX | vX | 40 mph with 3 toucan stand alone toucan crossings, compared to the position at 50 mph with no toucan crossings. The modelling shows that the main reason for the change in drive time is the reduction in speed limit and the that the additional toucan crossings have little or no impact. The proposed changes to the ring road could have beneficial impacts in terms of modifying driver behaviour and facilitating links between communities north and south of the ring road, which in turn would encourage journeys by non-car modes for shorter trips. |
| Objective 16: to use natural resources sustainably | - | - | - | |
| Objective 17: to reduce waste generation and disposal, and achieve the sustainable management of waste | - | - | - | |
| Objective 18: to maintain and improve water and soil quality and to achieve sustainable water and soil resource management | - | - | - | |
| Objective 19: to increase energy efficiency and the proportion of energy generated from renewable sources in Oxford | - | - | - | |
| Objective 20: to develop and maintain a skilled workforce to support long-term competitiveness of the region | - | - | - | |
| Objective 21: to ensure high and stable levels of employment so | - | - | - | |

| Predicting the effects of the changes to Policy BA1 | | | | |
|---|--|--|--|----------|
| Treatment of the A40 Ring Road | Option 1 | Option 2 | Option 3 | Comments |
| SA Objectives | Leave ring-road as it is | Amended Policy BA1 reduce speed (unspecified limit) with potential for some frontage development | Submission Policy BA1 Street with new frontages & lower speed 40 mph | |
| everyone can benefit from the economic growth of Oxford | | | | |
| Objective 22: to sustain economic growth and competitiveness across Oxford | - | - | - | |
| Objective 23: to stimulate economic revival in priority regeneration areas | - | - | - | |
| Comments Summary | Both Options 2 & 3 have the potential to improve air quality and lower noise levels by reducing traffic speeds, but the impacts of the amended policy are much less certain because it does specify a particular speed limit. Option 3 in particular positively integrates the new development with Barton and the rest of the city; and will help to create and sustain vibrant communities | | | |

Predicting the effects of the changes to Policy BA7

| Cycle and pedestrian access | Option 1 Access part of signal junction | Option 2 Crossing to Foxwell Drive | Option 3 Crossing to Stoke Place | Option 4 Crossing at Barton Lane | Option 5 Amended Policy incorporates option 1 and 4 with possibility of options 2 and 3 | Comments |
|--|---|--|---|--|---|---|
| SA Objectives | | | | | | |
| Objective 1: to reduce the risk of flooding and the resulting detriment to public well-being, the economy and the environment | - | - | - | - | - | |
| Objective 2: to encourage urban renaissance by improving efficiency in land use, design and layout | ✓ | ✓ | ✓ | ✓ | ✓ | |
| Objective 3: to meet local housing needs by ensuring that everyone has the opportunity to live in a decent, affordable home | - | - | - | - | - | |
| Objective 4: to improve the health and well-being of the population and reduce inequalities in health | ✓ | ✓? | ✓? | ✓? | ✓? | Encourages sustainable transport. Conflicting evidence has been presented on the safety implications of at-grade crossings. |
| Objective 5: to reduce poverty and social exclusion | ✓ | ✓ | ✓ | ✓ | ✓ | Promotes social inclusion |
| Objective 6: to raise educational achievement levels and develop the opportunities for everyone to acquire the skills needed to find and remain in work | - | - | - | - | - | |
| Objective 7: to reduce crime and the fear of crime | ✓ X | ✓ X | ✓ X | ✓ X | ✓ X | Depends on implementation |
| Objective 8: to create and sustain vibrant communities | Provides new links between Barton & Northway | ✓ | Promotes historic link between Old Headington & | ✓ | ✓✓ | |

Predicting the effects of the changes to Policy BA7

| Cycle and pedestrian access SA Objectives | Option 1 Access part of signal junction | Option 2 Crossing to Foxwell Drive | Option 3 Crossing to Stoke Place | Option 4 Crossing at Barton Lane | Option 5 Amended Policy incorporates option 1 and 4 with possibility of options 2 and 3 | Comments |
|---|---|--|---|--|---|--|
| | √√ | | the countryside. √√ | | | |
| Objective 9: to provide accessible essential services and facilities | - | - | - | - | - | |
| Objective 10: to make opportunities for culture, leisure and recreation readily accessible | √ | √ | √ | √ | √ | |
| Objective 11: to reduce air pollution and ensure air quality continues to improve | √ | √ | √ | √ | √ | |
| Objective 12: to address the causes of climate change through reducing emissions of greenhouse gases, and ensure Oxford is prepared for associated impacts | √ | √ | √ | √ | √ | |
| Objective 13: to conserve and enhance Oxford's biodiversity | - | - | - | - | - | |
| Objective 14: to protect and enhance and make accessible for enjoyment Oxford's countryside and historic environment | √ | √ | Could have an impact on character of Conservation Area, depending on width, surface, type of lighting etc. √? | √ | √ | All options provide greater access opportunities |
| Objective 15: to reduce road congestion and pollution levels by improving travel choice, shortening length and duration of journeys and reducing the need to travel by car/lorry | √√ | √ | √√ | √ | √ | All options promote improved travel choice, especially for shorter journeys. Modelling has |

Predicting the effects of the changes to Policy BA7

| Cycle and pedestrian access SA Objectives | Option 1 Access part of signal junction | Option 2 Crossing to Foxwell Drive | Option 3 Crossing to Stoke Place | Option 4 Crossing at Barton Lane | Option 5 Amended Policy incorporates option 1 and 4 with possibility of options 2 and 3 | Comments |
|---|--|--|--|--|---|--|
| | | | | | | shown that the effect of crossings on delays to traffic on the A40 is less significant than the effect of changes to the speed limit |
| Objective 16: to use natural resources sustainably | - | - | - | - | - | |
| Objective 17: to reduce waste generation and disposal, and achieve the sustainable management of waste | - | - | - | - | - | |
| Objective 18: to maintain and improve water and soil quality and to achieve sustainable water and soil resource management | √ X | √ X | √ X | √ X | √ X | Depends on surface material used |
| Objective 19: to increase energy efficiency and the proportion of energy generated from renewable sources in Oxford | - | - | - | - | - | |
| Objective 20: to develop and maintain a skilled workforce to support long-term competitiveness of the region | - | - | - | - | - | |
| Objective 21: to ensure high and stable levels of employment so everyone can benefit from the economic growth of Oxford | - | - | - | - | - | |
| Objective 22: to sustain economic growth and competitiveness across Oxford | - | - | - | - | - | |
| Objective 23: to stimulate economic revival in priority regeneration areas | √ | √ | √ | √ | √ | All options make Barton more accessible from the rest of the city |
| Comments Summary | The proposed modifications to Policy BA7 have the effect of weakening the commitment to the Stoke Place crossing | | | | | |

Predicting the effects of the changes to Policy BA7

| Cycle and pedestrian access SA Objectives | Option 1 Access part of signal junction | Option 2 Crossing to Foxwell Drive | Option 3 Crossing to Stoke Place | Option 4 Crossing at Barton Lane | Option 5 Amended Policy incorporates option 1 and 4 with possibility of options 2 and 3 | Comments |
|--|--|--|--|--|---|----------|
| | <p>from being a policy requirement to a policy aspiration. Otherwise the policy is the same as previously submitted. It incorporates options 1 and 4, with the possibility of options 2 and 3.</p> <p>It was noted in the original SA that options 1 & 3 appear to offer the most significant benefits in creating new and improved links to the surrounding areas, both existing settlements, Headington and Northway and extending opportunities to the countryside. However, all options positively promote sustainable means of travel, encourage greater integration, and will promote a good urban design layout. The amendment to the policy makes relatively little difference to the assessment of impacts, although it does reduce the likelihood of the benefits associated with option 3 being achieved in practice.</p> | | | | | |

Assessment of Land at Ruskin College

Introduction

The April 2011 sustainability appraisal for the Barton Area Action Plan included a preliminary appraisal of both large and small development at the Ruskin Fields site: an 'original scheme' of up to 193 dwellings, and an unquantified 'smaller scheme'. It also appraised various access options to the site. The appraisal concluded that further information would be needed before a well-informed decision could be made:

"No preferred option has been identified in the document. Option 1 (do nothing) assumes no development, since the site is not allocated through the Core Strategy or emerging Sites DPD. Whilst there may well be some benefits in retaining the site and protecting the countryside and its biodiversity this is difficult to assess in the absence of any detailed appraisals. Option 2 (original proposal) for a large residential development could potentially have significant negative impacts on sustainability, such as flooding, air pollution, climate change, biodiversity and traffic congestion. Insufficient detailed evidence has been provided to assess these potentially adverse impacts. Option 3 (small scheme) would still have some negative impacts, which would need to be explored through more detailed assessments."

A final sustainability appraisal report was produced in February 2012. This included a paragraph setting out why the land at Ruskin Fields had not been allocated in the proposed submission version of the AAP, but did not re-run the original sustainability appraisal assessment in the light of additional information provided by Ruskin College and its agents West Waddy in August 2011. Planning officers and councillors had visited the site in September 2011, and planning officers had considered the additional information provided by Ruskin College prior to the decision of the City Council in December 2011 to not include Ruskin Fields in the Barton AAP.

The Planning Inspector for the Barton AAP requested that the August 2011 information should be more clearly documented and commented on in the sustainability appraisal, while in addition Ruskin College has put forward more detailed proposals for a smaller development in June 2012. The Oxford Preservation Trust has also proposed an 'Option 4' for the site.

This report summarises the information provided by Ruskin College since the April 2011 sustainability appraisal, explains how this information has been considered, explains what additional options have been assessed, and shows the findings of the revised sustainability appraisal.

Further information since August 2011

Since April 2011, Ruskin College and West Waddy have provided more than 20 reports on the impacts of development at Ruskin Fields, some related to an initial proposal for 175-193 dwellings, some related to 150 dwellings, and very recently some related to 69 (or 70) dwellings. They are listed below, and have informed the appraisal below.

| Ruskin College / West Waddy Appendices that have informed this appraisal | | | |
|---|--|--|--|
| Topic | August 2011 175-193 dwellings | October - December '11 150 dwellings | June 2012 69 or 70 dwellings |
| Masterplan, links to Old Headington conservation area, housing | A – the Barton Area Action Plan B – development promotion for Ruskin College E – planning and urban design context | K – proposed masterplan at Ruskin Fields | N – design rationale O- masterplan for Ruskin Fields U – 'do nothing' W – deliverability and housing need |

| | | | |
|-----------------------|--|---|------------------------------------|
| Archaeology | C – heritage statement D – archaeological desktop assessment | | |
| Ecology | F – preliminary ecological assessment J – arboricultural survey | | R – brief note 'ecology' |
| Landscape / visual | G – landscape and visual assessment | P – update of land and visual assessment report | |
| Flooding and drainage | H – flood risk assessment I – drainage statement | | |
| Transport | M – sustainability strategy | S - transport assessment | T – transport assessment |
| Noise | | | Q – environmental noise assessment |
| Energy | L – energy strategy | | |

How the further information was considered

Appendix A shows the timeline of correspondence about the Ruskin proposal. Councillors visited Ruskin Fields and discussed the Ruskin proposals with the developers on 8 September 2011. On 8 December 2011 they received a letter from Ruskin College urging them to include the Ruskin proposal in the AAP or Sites Plan.

The Environment Agency commented on the flood risk assessment and drainage statement (Appendices H and I) on 5 September 2011, and these comments were forwarded to West Waddy on 4 October 2011.

Oxfordshire County Council's transport officers commented on the development promotion and transport sustainability strategy reports (Appendices B and M) on 21 September 2011, essentially stating that it was not possible to come to a conclusion about the transport impacts of the development without further data. This was forwarded to West Waddy on 4 October 2011. County officers have also commented on the additional traffic appraisal of June 2012 (see the table below).

Appendix B collates the views of these various experts on the August 2011 reports. **Appendix C** is an internal note prepared by an Oxford City Council planning officer for the Head of City Development in advance of the 8 September 2011 meeting with Ruskin College. They do not include comments on information presented after September 2011.

Options considered

Ruskin College / West Waddy presented several new reports, dated June 2012, related to a specific smaller proposal of 69-70 dwellings to the Examination in Public. This appraisal considers this new proposal as 'Option 3', since it is a more specific smaller development. This was not strictly necessary, as the new documents were prepared several months after the cut-off date for submission of the AAP documents, but has been done in the spirit of best practice and active consideration of sustainable and feasible options.

Alternative access arrangements to the site have not been re-assessed since Ruskin College have clarified that they would expect access to be to/from Foxwell Drive. The appraisal for Options 2 and 3 assumes access to/from Foxwell Drive. The April 2011 sustainability appraisal considered various access options, including access to/from Foxwell Drive.

On 22 July 2012, the Oxford Preservation Trust proposed an 'Option 4' as a modification to the AAP, namely that Ruskin Fields should be allocated as a 'Protected Open Space'. This would protect Ruskin Fields from development in perpetuity. However this option was not felt to be a reasonable

alternative for the AAP taking into account the AAP's objectives and geographical scope as required by SA/SEA legislation. The AAP is aimed at guiding “future development and change associated with new homes proposed on the north-east of the city on land to the north of the ring-road at Barton”, and its objectives are to:

- Deliver a strong and balanced community
- Bring wider regeneration of neighbouring estates
- Improve accessibility and integration
- Encourage a low-carbon lifestyle
- Introduce design that is responsive and innovative.

None of these would appear to be advanced by a conservation area protection restraint policy. Furthermore, the impacts of development constraint in perpetuity are likely to be very similar to those of a 'do nothing' option. As such, this option has not been formally appraised.

Appraisal of 'do nothing', larger (2011) proposal and smaller (2012) proposal

The appraisal assesses the likely impacts of 'do nothing', a larger site of 150-193 dwellings, and a smaller site of 69-70 dwellings, taking into account the documents listed above, the views of other experts, and officers' knowledge of the Ruskin Fields site. Where it differs from the appraisal of April 2011, this is due to the additional information provided by Ruskin/West Waddy and the experts.

| Predicting the effects of the options - Ruskin College Proposals | | | | |
|---|--------------------------|------------------------------------|-------------------------------------|---|
| SA Objectives | Option 1 'Do nothing' | Option 2 Larger (2011) proposal | Option 3 Smaller (2012) proposal | Comments |
| <p>Objective 1: to reduce the risk of flooding and the resulting detriment to public well-being, the economy and the environment</p> | - | -? | -? | <p>The flood risk assessment for Ruskin Fields (Appendix H) shows that the site is not at risk from fluvial flooding, overland flows, rising groundwater levels, surcharging of the local sewer network, or flooding by reservoirs, canals or other artificial sources.</p> <p>The drainage statement (Appendix I) explains how runoff from the site will be minimised. The Environment Agency commented on 5 September 2011 about Appendices H and I:</p> <p><i>"We are pleased that sustainable drainage principles will be implemented as part of the development and we find the calculated Greenfield runoff rates acceptable. However, it is not acceptable to merely restrict surface water discharge rates to the 1 in 100 year Greenfield rate during all rainfall events. It is important that it is demonstrated that discharge rates will match Greenfield rates across a range of storm events up to and including the 1 in 100 year storm event with an allowance for climate change (the design storm event).</i></p> <p><i>Some good SuDS techniques are discussed in the FRA, but the use of cellular storage devices should be minimised due to their high maintenance requirements and lack of the environmental enhancements offered by other techniques. It is important that the whole SuDS management train is implemented as an integral part of the development, with source, site and regional control techniques included in the drainage system. This maximises the water quality, biodiversity and amenity benefits available through the use of SuDS.</i></p> |

| Predicting the effects of the options - Ruskin College Proposals | | | |
|--|--------------------------|------------------------------------|---|
| SA Objectives | Option 1 'Do nothing' | Option 2 Larger (2011) proposal | Option 3 Smaller (2012) proposal |
| | | | <p><i>If this development were to come forward as an outline planning application, with the layout reserved, we would want to see the indicative surface water drainage layout drawing. This should clearly demonstrate that the necessary surface water attenuation storage is achievable within a development of the proposed density, using a suitable mix of SuDS techniques (supported by calculations).</i></p> <p><i>If this development were to come forward as a full planning application (layout to be fixed), we would want to see exactly where the necessary surface water attenuation storage will be provided using a suitable mix of SuDS techniques (supported by calculations).</i></p> <p><i>BRE 365 compliant infiltration tests should be carried out across the whole site to inform the design of the surface water drainage system. However, if the drainage system is designed based on the assumption of an infiltration rate of zero and a suitable alternative method of discharge is identified, then the infiltration tests can be delayed until a later stage.</i></p> <p><i>It must be demonstrated that the surface water drainage system will not flood from surface water during storm events up to and including the design event. Alternatively, it could be demonstrated that any surface water flooding beyond the 1 in 30 year storm event, up to and including the design storm event would be safely contained on site.</i></p> <p><i>The future maintenance of the drainage system should be considered throughout the design stages to ensure that the system performs as designed</i></p> |

| Predicting the effects of the options - Ruskin College Proposals | | | | |
|--|--------------------------|------------------------------------|-------------------------------------|---|
| SA Objectives | Option 1 'Do nothing' | Option 2 Larger (2011) proposal | Option 3 Smaller (2012) proposal | Comments |
| | | | | <i>over the lifetime of the development."</i> |
| Objective 2: to encourage urban renaissance by improving efficiency in land use, design and layout | - | X ✓ | X ✓ | The original 2011 Ruskin proposal (Appendix B) was for 175-193 new dwellings on 3.5 hectares, equivalent to 50-55 dwellings/hectare: an efficient land use. Appendix K refers to 150 homes, at 40-45 dwellings/hectare. The smaller proposal of June 2012 (Appendix N) is for 69 new homes on 3.5 hectares, i.e. 20 dwellings / hectare. This would normally not be an efficient use of land, but it is recognised that Ruskin have produced option 3 in an attempt to overcome the Conservation Area concerns. Neither Option 2 nor Option 3 makes use of previously developed or derelict land/buildings. Both Options 2 and 3 would include areas of open space, but would otherwise provide no further services, nor would then create a self sustaining community. Oxford Core Strategy Policy CS18 requires high quality urban design. The Ruskin proposed masterplan for Option 2 (Appendix K) would be for buildings that "respond to and reflect the local context in form and materials, used in a contemporary manner, with an architectural language of sensitivity and variety". The masterplan for Option 3 (Appendix O) would be for "A series of dwellings arranged in clusters, nestled into the landscape; Walled gardens giving direct access to the meadows; A mixed material palette of stone, brick and dark timber; Street defined by walls and building edges." |
| Objective 3: to meet local housing needs by ensuring that everyone has the opportunity to live in a decent, affordable home | - | ✓ ✓ | ✓ | Option 2 would deliver between 150 and 193 dwellings. Option 3 would deliver 69 dwellings. Policy CS24 requires a minimum of 50% affordable housing: both Options 2 and 3 would be for 50% affordable housing . |
| Objective 4: to improve the health and well-being | - | | | Appendix U suggests that the 'do nothing' option would entail the 'loss of |

| Predicting the effects of the options - Ruskin College Proposals | | | | |
|--|--------------------------|------------------------------------|-------------------------------------|---|
| SA Objectives | Option 1 'Do nothing' | Option 2 Larger (2011) proposal | Option 3 Smaller (2012) proposal | Comments |
| of the population and reduce inequalities in health | | XV | XV | quality, easily accessible public open space', but in practice the Ruskin Fields site would simply remain inaccessible to local residents. Under Options 2 and 3, the site would be opened up to local residents through a series of footpaths and cycleways, more so under Option 3 than Options 2. This could help to encourage walking and cycling. Both Options 2 and 3 would lead to more vehicular traffic, with associated impacts in terms of air pollution, possibility for accidents etc. in the Foxwell Drive area. Noise is likely to be a problem at the site, and could affect residents' health. An environmental noise assessment for the site (Appendix Q) concluded that "internal noise levels can be mitigated to meet the noise levels set out in BS8233:1999... The external noise levels are currently higher than the proposed guidance set out in BS8233. Once there is a proposed layout for the site, the inherent noise mitigation provided by the buildings can be assessed... With appropriate mitigation measures in place, the development ought to be able to meet the requirements of the National Planning Policy Framework and aims of the Noise Policy Statement for England". |
| Objective 5: to reduce poverty and social exclusion | - | V V | V | No real impact would result from any option on the proportion of children living in low-income homes, people claiming key benefits, fuel poverty etc. However, development would provide affordable housing for those in need. |
| Objective 6: to raise educational achievement levels and develop the opportunities for everyone to acquire the skills needed to find and remain in work | ? | ? | ? | No assessment has been done to show the impact on the capacity of the proposed new primary school at Barton to meet any additional need. |
| Objective 7: to reduce crime and the fear of crime | - | - | - | Appendix U suggests that the 'do nothing' option would lead to reduced |

| Predicting the effects of the options - Ruskin College Proposals | | | | |
|---|--------------------------|------------------------------------|-------------------------------------|--|
| SA Objectives | Option 1 'Do nothing' | Option 2 Larger (2011) proposal | Option 3 Smaller (2012) proposal | Comments |
| | | | | activity and isolation at the Stoke Place pedestrian/cycle route, leading it to feel isolated and unsafe due to lack of surveillance. However no data are provided to back up this assertion, and the Old Headington Conservation Area Appraisal notes that local residents particularly value the green and undeveloped nature of the bridleway. Development of either option 2 or 3 is unlikely to lead to significant changes in crime or the fear of crime. |
| Objective 8: to create and sustain vibrant communities | - | ? | ? | Appendix U suggests that the 'do nothing' option would lead to a "Reduction in activity, vitality and sense of place that would link neighbouring communities", but in practice it would simply not increase activity on the site. Existing local residents would be offered more recreational opportunities once they have gone down 'Green Street'. However both Options 2 and 3 are essentially cul-de-sac developments serviced by Foxwell Drive. While in theory the development of this site would help to improve integration with the new community on the strategic site to the north of the ring road, which is a key objective of the Baton AAP, the layout of the development is likely to do little to sustain or create vibrant communities. Consultation on Option 2 showed that most local residents were opposed to the development. |
| Objective 9: to provide accessible essential services and facilities | - | - | - | Neither Option 2 nor Option 3 would deliver new services or facilities. The Ruskin Fields development promotion report (Appendix B) suggests that residents of Ruskin Fields would mostly use the facilities of Northway District: shops, a post office, pharmacy, police office etc. |
| Objective 10: to make opportunities for culture, leisure and recreation readily accessible | - | v | v? | Dunstan Park currently offers open space for residents of Foxwell Drive and beyond. The footpath at Stoke Place may be upgraded and reconnected to the RoW. |

| Predicting the effects of the options - Ruskin College Proposals | | | | |
|---|--------------------------|------------------------------------|-------------------------------------|---|
| SA Objectives | Option 1 'Do nothing' | Option 2 Larger (2011) proposal | Option 3 Smaller (2012) proposal | Comments |
| | | | | Both Options 2 and 3 would increase access to open space, Option 3 more so than Option 2. |
| Objective 11: to reduce air pollution and ensure air quality continues to improve | - | X | X | Both schemes would potentially have an impact on air pollution, but the greatest coming from the larger scheme. |
| Objective 12: to address the causes of climate change through reducing emissions of greenhouse gases, and ensure Oxford is prepared for associated impacts | - | X | X | The Ruskin Fields Energy Strategy (Appendix L) explains that the development would implement a sustainable energy strategy. This would focus on passive design and fabric efficiency measures first, and then implement renewable or low carbon energy generation technologies. The preference would be for connection to an off-site CHP network, otherwise solar panels would be viable. This should achieve a Code for Sustainable Homes Level 4 with a parallel target of 20% of energy delivered by renewable or low carbon technology. Both Options 2 and 3 would promote walking and cycling, but even the smaller option would still generate more than 300 car journeys over a 12 hour period (Appendices S and T). |
| Objective 13: to conserve and enhance Oxford's biodiversity | ✓ | X X | XX | Better management of the existing Ruskin Fields under a 'do nothing' option, for instance through tree planting, could deliver greater climate change benefits. A pond has been created in the middle of the site as part of a sustainable drainage scheme for development at Ruskin College. The ecological assessment of August 2011 (Appendix F) noted that the area around the new pond was bare, and that the pond did not yet support any vegetation. However in time the biodiversity of the site should improve regardless of any further development. Options 2 and 3 would not affect the pond or associated stream. |

| Predicting the effects of the options - Ruskin College Proposals | | | | |
|--|--------------------------|------------------------------------|-------------------------------------|---|
| SA Objectives | Option 1 'Do nothing' | Option 2 Larger (2011) proposal | Option 3 Smaller (2012) proposal | Comments |
| | | | | <p>The integration of a small stream, pond and hedgerows in the proposed masterplan would be a positive use of existing landscape features. The creation of a 'green street' with a 'swale' could help to create a distinctive, rustic streetscape. The swale would also create a wildlife corridor.</p> <p>The preliminary ecological assessment (Appendix F) explains that the site is primarily semi-improved neutral grassland of relatively low biodiversity value. However the hedges running alongside the ring road (hedges 7, 9 and 10) are 'important' as defined by criteria outlined in The Hedgerows Regulations 1997, as is the hedgerow dividing the small square field from the large field (hedge 8).</p> <p>Hedges 7, 8 and 10 would all be significantly affected by both Options 2 and 3, with gaps cut in to accommodate walking and cycling routes, and new homes built close to the hedge line.</p> <p>A one day survey of bird species on the site identified 18 bird species, of which four have 'amber' Birds of Conservation Concern 3 status, and one (song thrush) has red status. A one night survey of bat activity suggested that the site is used by at least six species of bats, which are all protected. Bats were recorded foraging inside hedgerow that runs along the bypass and the north-south hedgerow dividing the site. These surveys suggest that the site is of city level importance for birds and bats.</p> <p>The ecological assessment (Appendix F) suggests that, after mitigation and enhancement, most of the biodiversity effects of new development would be</p> |

| Predicting the effects of the options - Ruskin College Proposals | | | | |
|--|--------------------------|------------------------------------|-------------------------------------|---|
| SA Objectives | Option 1 'Do nothing' | Option 2 Larger (2011) proposal | Option 3 Smaller (2012) proposal | Comments |
| | | | | <p>slight beneficial due to the provision of new bird boxes, bat roosting habitat, 'detailed management and monitoring plan to be provided' etc. However guidance by Natural England¹ notes that</p> <p><i>"If key habitat linkages such as hedges, woodland shaws and shelter belts are lost or severed, this may have indirect impacts upon the breeding site or resting place used by bats. Some species require almost continuous cover provided by such features whilst others will use more open habitat. As such, for significant roosts or where there are high levels of bat activity... the mitigation scheme should ensure maintenance of habitat linkages and key flight lines out from the roosts.... Where significant roosts or areas of high bat activity are to be impacted, the surveys should highlight the key foraging areas along with ways in which this will be maintained and enhanced to maintain the population of bats locally. Although feeding habitats are not specifically protected, major developments may cause significant disturbance to bats in relation to the Conservation of Habitats and Species Regulations (2010)".</i></p> <p>An addendum to Appendix F, Appendix R, suggests that Option 3 would allow the central hedgerow to function ecological very much as at present; that locating gardens between hedgerows and dwellings would allow the hedgerows to continue to function as wildlife corridors; and that Option 3 allows greater scope for ecological enhancement than Option 2.</p> <p>However, the City Council's ecologist has indicated that the existence in the</p> |

¹ http://www.naturalengland.org.uk/Images/Bats_tcm6-21717.pdf

| Predicting the effects of the options - Ruskin College Proposals | | | | |
|---|--------------------------|------------------------------------|-------------------------------------|--|
| SA Objectives | Option 1 'Do nothing' | Option 2 Larger (2011) proposal | Option 3 Smaller (2012) proposal | Comments |
| | | | | north western corner of the site of a field with hedges of high wildlife value, diverse grassland and wetland community and scrub is likely to provide particularly good habitat for plants (including locally uncommon Dropwort), invertebrates, and birds. The proposed development, including the smaller scheme in option 3, is in this part of the site, maximising the potential loss of habitat for important wildlife species. |
| Objective 14: to protect and enhance and make accessible for enjoyment Oxford's countryside and historic environment | - | XX | XX | <p>An archaeological assessment of July 2006 (Appendix D) suggests that development at the site could have significant archaeological impacts:</p> <p><i>"The site lies within a known area of Romano-British activity with a large number of kiln sites identified in previous archaeological investigations. The discovery of a quantity of Romano-British pottery on the Site during building work in the 1970's has led to speculation of a kiln site at Ruskin Hall. The potential of the Site to contain significant archaeological deposits of the following periods has been assessed at: Prehistoric – uncertain potential; Roman – high potential; Early Medieval – uncertain potential; Later Medieval – moderate potential; Post-Medieval and Modern – high potential".</i></p> <p>Options 2 and 3 would both involve development in the Old Headington Conservation Area. The Ruskin Fields development promotion document (Appendix B) of January 2011 suggests that the development area plays a limited and passive role within the conservation area:</p> <p><i>"The role of Ruskin Fields within the Conservation Area appears therefore to be almost entirely passive, its positive role being limited to one of two viewpoints and the naturally softening effects produced by any substantial area of open space with vegetation... it has to be said that the architectural,</i></p> |

| Predicting the effects of the options - Ruskin College Proposals | | | | |
|---|---------------------------------|---|--|---|
| SA Objectives | Option 1 'Do nothing' | Option 2 Larger (2011) proposal | Option 3 Smaller (2012) proposal | Comments |
| | | | | <p>artistic or historic interest of the Fields is negligible, and that their archaeological interest is not strictly relevant to their inclusion within the Conservation Area...</p> <p>The main function of Ruskin Fields is to provide a softer, greener setting for the north side of Old Headington and assist in filtering out the nearby Northern Bypass. For these reasons it is considered that an appropriate balance could be struck by development of part of Ruskin Fields that produced recognised public benefits while retaining a screening and supporting function for the immediate settings of listed and unlisted buildings within the Conservation Area."</p> <p>However, Oxford City Council's subsequent Old Headington Conservation Area Appraisal of July 2011 notes that the green fields in the conservation area provide</p> <p>"The last remnants of the green fields that once ran up to the edges of the village, now cut off from the countryside by the ring road; Views from the public realm across green open spaces with visual connection to the South Oxfordshire countryside beyond the Bayswater Brook; Footpaths and sinuous lanes with grass verges and banks and hedgerow boundaries preserve the rural character of the village's setting; The green spaces in this character area are important in views to the conservation area from outside its boundaries... The green bridleway at Stoke Place was identified as a particularly valued feature by respondents to public consultation on the conservation area appraisal...."</p> |

| Predicting the effects of the options - Ruskin College Proposals | | | | |
|---|--------------------------|------------------------------------|-------------------------------------|--|
| SA Objectives | Option 1 'Do nothing' | Option 2 Larger (2011) proposal | Option 3 Smaller (2012) proposal | Comments |
| | | | | <p><i>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."</i></p> <p>The masterplan for Options 3 (Appendix O) states that it will "demonstrate how a development on Ruskin Fields could enhance the Conservation Area of Old Headington". It analyses various dimensions of the conservation area – built form, walls, materials etc. – and then proposes a masterplan that aims to echo and built upon these dimensions. However this masterplan does not address the essential role of the fields identified in the conservation area assessment, namely that they are open and not built upon. As such, Options 2 and 3 would not be in accordance with Policy CS18.</p> |
| Objective 15: to reduce road congestion and pollution levels by improving travel choice, shortening length and duration of journeys and reducing the need to travel by car/lorry | - | XX | X | <p>The Ruskin Fields transport assessment (Appendix T) of December 2011 concludes that the site has excellent accessibility to local public transport services and walking and cycling routes. It bases this on bus services running from the John Radcliffe Hospital and London Road, both of which are 'within an acceptable walking distance of the site'. It notes that the John Radcliffe Hospital bus stops are within 400m of the site, but this is as the crow flies, and from only the closest part of the site. Bus stops on the London Road are noted as being 'approximately 0.5km' from the site, but again this is as the crow flies, and in practice likely to be rather more than this. Facilities at Headington District Centre are 'within the preferred maximum walking distances set out in national guidance', i.e. 1200m.</p> <p>Both Options 2 and 3 would promote walking and cycling in the form of</p> |

| Predicting the effects of the options - Ruskin College Proposals | | | |
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| SA Objectives | Option 1 'Do nothing' | Option 2 Larger (2011) proposal | Option 3 Smaller (2012) proposal |
| | | | <p>of the Eastern Arc Strategy but this will need to be considered by the developer as part of a planning application</p> <p>Access:</p> <ul style="list-style-type: none"> Any vehicular access onto the A40 would be unacceptable The only acceptable location for vehicular access would be off Foxwell Drive, and even this would be subject to final trip generation estimates Based on the current trip generation figures provided, access via Foxwell Drive would be acceptable though some mitigation may be required Ways of making pedestrian and cycle routes to bus stops more direct should be considered, particularly for the southern part of site <p>Potential benefits for pedestrians and cyclists (depending on final layout):</p> <ul style="list-style-type: none"> More route choice for access to ring road cycle track More route choice for access to / from Barton via site access junction <p>Trip generation:</p> <ul style="list-style-type: none"> Suggested trip generation figures are noted. The trip generation figures for any forthcoming planning application would need to be assessed using TRICS figures with valid input parameters and network distribution. Appropriate mitigation would relate to estimated trip generation. <p>Parking:</p> <ul style="list-style-type: none"> Total parking provision (whether on-street, off-street or a combination) should be towards the lower end of the parking standards given the existence of a CPZ in the vicinity of the site and the proximity of the site to Headington District Centre and employment sites. The developer will need |

| Predicting the effects of the options - Ruskin College Proposals | | | | |
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| SA Objectives | Option 1 'Do nothing' | Option 2 Larger (2011) proposal | Option 3 Smaller (2012) proposal | Comments |
| | | | | <i>to show how parking will be managed effectively. This will help minimise the generation of new trips and make the most efficient use of land.</i> |
| Objective 16: to use natural resources sustainably | - | X? | X? | New development at Ruskin Fields would use natural resources for construction. This would be minimised through Core Strategy policies. |
| Objective 17: to reduce waste generation and disposal, and achieve the sustainable management of waste | - | X? | X? | New development at Ruskin Fields would generate additional waste, both during construction and operation. This would be minimised through Core Strategy policies and other measures. |
| Objective 18: to maintain and improve water and soil quality and to achieve sustainable water and soil resource management | - | - | - | None of the options is likely to reduce land contamination, enhance the quality of groundwater and waterways, or reduce per capita water consumption. |
| Objective 19: to increase energy efficiency and the proportion of energy generated from renewable sources in Oxford | - | - | - | See Objective 12 |
| Objective 20: to develop and maintain a skilled workforce to support long-term competitiveness of the region | - | - | - | n/a: residential-only scheme. |
| Objective 21: to ensure high and stable levels of employment so everyone can benefit from the economic growth of Oxford | - | - | - | n/a: residential-only scheme. |
| Objective 22: to sustain economic growth and competitiveness across Oxford | - | - | - | Provision of new homes may have minor benefits for Oxford's economic growth and competitive, but these would be insignificant in the wider context of Oxford's Core Strategy, development at Barton etc. |
| Objective 23: to stimulate economic revival in priority regeneration areas | - | - | - | n/a: residential-only scheme. |

Conclusion

Option 1 (do nothing) assumes no development. The site and surroundings are likely to naturally change, for instance if Stoke Place is upgraded to accommodate more cycle and pedestrian movements, and establishment of the new pond at the site as part of a sustainable drainage scheme for the Ruskin College developments. However essentially the site would maintain its open character and its benefits for ecology.

Option 2 for a residential development of 150-193 dwellings would help to meet the city council's housing targets and improve local access to green areas. The integration of a small stream, pond and hedgerows in the proposed masterplan would be a positive use of existing landscape features. The creation of a 'green street' with a 'swale' could help to create a distinctive, rustic streetscape. The swale would also create a wildlife corridor.

However Option 2 would have significant negative impacts that cannot be managed through the detailed design and layout of the development:

- The density and height of development proposed would not support the role that Ruskin Fields play in the Old Headington Conservation Area, namely a rural character and wide open views in close proximity to the tightly enclosed village centre, and provision of views to the built-up part of the conservation area from outside its boundaries.
- The placement of three- and four- storey blocks at the northern edge of the site is likely to result in the creation of an unduly prominent and intrusive building line within one of the key views identified in the conservation area appraisal.
- Development would have a direct impact on important hedgerows, six protected bat species and several important bird species.
- The development is sited within (relatively far) walking distance from good, frequent bus services. However, even so it would generate about 650 car trips over a 12 hour period, which would be channelled onto the residential streets branching off Foxwell Drive.
- The development could also affect Roman archaeology on the site, and increase runoff and air pollution.

The impacts of Option 3 would be similar to but smaller than those of Option 2. It would be less visually intrusive, generate less traffic, and cause fewer problems of runoff and air pollution. It would provide significantly fewer new homes. However the scheme would still have significant visual impacts on a conservation area, and would still significantly affect the more ecologically sensitive parts of the sites (including hedgerows and bats).

In summary, development on the open parts of the site is constrained by the site's role as open green space within the Old Headington Conservation Area; and development near the hedges and trees is constrained by the site's ecological importance. As has been demonstrated both the larger and smaller developments would generate net negative impacts. As such, Option 1 (do nothing) is the preferred option.

Appendix A: Correspondence between Oxford City Council and West Waddy (Ruskin Fields) CD7.15.4

The table below identifies correspondence between Oxford City Council and Ruskin College (including their consultants West Waddy) on the subject of Ruskin Fields. The table contains correspondence between March 2010 at the commencement of work on the Barton Area Action Plan and April 2012 with the submission of the AAP.

| Date | Method of contact | Details | City Council follow up |
|--|--------------------------|--|--|
| 4 th March 2010 | Meeting | Rachel Williams and Laura Goddard (City) Audrey Mullender (Ruskin College) and John Ashton and Caroline Longman (West Waddy ADP) To discuss Ruskin's submissions to the call for sites and possible links to the Barton AAP. It was agreed that the Ruskin site would remain on the database for the Sites DPD but that if a decision was taken to incorporate it into the AAP, it would be removed at that time. Ruskin agreed to forward the studies they've had done on their land (including biodiversity and archaeology) and asked to be kept informed of the AAP progress. They were encouraged to take an active part in the AAP options consultation. | Discussion with Conservation colleagues on proposals (10.3.10) Raised Ruskin's proposals at Barton Project Team Meeting (26.3.10) |
| 9 th April 2010 | Evidence submitted | Evidence submitted <ul style="list-style-type: none"> • 2006 archaeological desktop report • 2007 preliminary ecology report and plan • 2006 conservation report • 2009 landscape statement | Updated the Barton Project Team (19.4.10) Discussion with Conservation colleagues (8.6.10) |
| 14 th May 2010 | Evidence submitted | Barton AAP – The Wider Vision (Jan 2010) Landscape and Visual Impact Assessment (May 2010) | |
| 24 th May 2010 | Evidence submitted | Heritage Statement (05/2010) | |
| 19 th May 2010 | Meeting | Rachel Williams and Laura Goddard (City) Audrey Mullender (Ruskin College) and John Ashton and Caroline Longman (West Waddy ADP) Update on Ruskin College progress with background work | |
| 11 th June – 23 rd July 2010 | Consultation period | Consultation on Issues Document and Sustainability Appraisal Scoping Report | |
| 15 th July 2010 | Consultation response | Questionnaire responding to Issues Document completed on behalf of Ruskin College (commented that important that Ruskin Colleges site is included in AAP as a strategic link between the new development, Barton, Northway and Old Headington). No response to SA Scoping Report. | Issues Consultation Report published in September 2010 and results used to feed into Preferred Options Document |

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| 3 rd August 2010 | Meeting | Cllr Colin Cook (City) Audrey Mullender (Ruskin College) and John Ashton (West Waddy ADP) | |
| 3 rd November 2010 | Letter | Letter from Alison Bailey (City) to West Waddy Confirms that Ruskin proposals will be considered in AAP rather than Sites and Housing Plan. | |
| 9 th December 2010 | Meeting | Alison Bailey, Michael Crofton Briggs, Adrian Roche (City), Audrey Mullender (Ruskin College), John Ashton, Caroline Longman (West Waddy ADP) To discuss the process moving forward. | |
| 10 th January 2011 | Meeting | Ruskin College, West Waddy (and other consultants) local residents and local members To discuss the College's proposals for the Ruskin Fields | |
| 21 st January 2011 | Evidence submitted | Submission: Development Promotion Document | This was circulated for comments internally including to Conservation colleagues and also to County Council transport planners |
| 24 th March 2011 (1hr) | Meeting | Ruskin/West Waddy: Caroline Longman, John Ashton, Audrey Mullender, And City: Mark Jaggard, Alison Bailey. Discuss the progression on the project. | |
| 13 th April 2011 | Committee meeting | City Executive Board approve Preferred Options Document for consultation | |
| 13 th May – 24 th June 2011 | Consultation period | Consultation on Preferred Options Document and Sustainability Appraisal Report | |
| 24 th June 2011 | Consultation response | West Waddy submit response to Preferred Options Document and Sustainability Appraisal together with: Highways and Transport Paper (June 2011) DT Transport Planning Development Promotion Document (January 2011) West Waddy (previously submitted Jan 2011) The Wider Vision (April 2010) West Waddy (previously submitted-May 2010) Preliminary Ecological Appraisal (February 2007) Ecoconsult (previously submitted) Bat Survey (July 2007) Ecoconsult Landscape and Visual Assessment (May 2010) Land and Landscape Management Ltd Heritage Statement (revised June 11) | |
| 16 th June 2011 | Meeting | Stakeholder Briefing Event (attended by Ruskin College and West Waddy) | |
| 6 th July 2011 | Committee Meeting | East Area Planning Committee endorse the final Old Headington Conservation Area Appraisal | |

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| 13 th July 2011 | Meeting | West Waddy: Ruskin College Alison Bailey, Tom Morris, Mark Jaggard (City) Caroline Longman, Steve Pickles (West Waddy) Discussed the evidence provided to justify the site as a sound proposal and elements that are missing and the timetable to the production of the proposed submission document. | |
| 26 th July 2011 | Meeting | West Waddy and County Transport Planners To discuss the transport work that was submitted as part of Ruskin's response to the Preferred Options consultation | |
| 4 th August 2011 | Email | Email from Alison Bailey (City) to West Waddy Explaining the County Council's view that the transport evidence submitted (In June) does not constitute a framework Transport Assessment. | |
| 15 th August 2011 | Evidence submitted | <ul style="list-style-type: none"> • Deliverability and Housing Need (August 2011) Savills • Drainage Statement (August 2011) OMK Design • Flood Risk Assessment (August 2011)OMK Design • Energy Strategy (August 2011) Parsons Brinckerhoff • Landscape and Visual Impact Assessment (revised August 2011) Land and Landscape Management • Preliminary Ecological Assessment (revised August 2011) Ecoconsult • Transport Assessment (August 2011) DT Transport Planning • Transport Sustainability Strategy (August 2011) DT Transport Planning • Heritage Statement (revised August 2011)West Waddy • Planning and Urban Design Context (August 2011) West Waddy • Proposed Masterplan (August 2011)Penoyre and Prasad • Arboriculture Report (July 2011) | Evidence considered by planning officers and in addition circulated to appropriate experts for comments: including the county Council on transport; the Environment Agency on flooding and Conservation colleagues on heritage evidence |
| 17 th August 2011 | Email | Email invite from Audrey Mullender to All Members Invitation to visit Ruskin fields on the 8 th September, to discuss thoughts about the site. | |
| 25 th August 2011 | Email | Email from Audrey Mullender to Michael Crofton-Briggs Extending the invite to City Council officers | |
| 25 th August 2011 | Email | Email from Caroline Longman to Laura Goddard – Requesting documents submitted for the Barton AAP be forwarded to the Sites and Housing team | |
| 5 th September 2011 | Letter | Letter to City Council from Cathy Harrison (EA) providing comments on the Flood Risk Assessment and Drainage Statement. Concluded further work would be needed in | Comments forwarded to West Waddy (4.10.11) |

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| | | the future including calculations. | |
| 8 th September 2011 | Meeting | Ruskin College Michael Crofton-Briggs, Marta Bou Fernandez (City), Audrey Mullender (Ruskin College), City Councillors Site visit at Ruskin fields, organised by Ruskin College to discuss their proposed proposals with City Councillors. | |
| 6 th September 2011 | Email | Email from Alison Bailey to Caroline Longman (West Waddy) An email confirming the Committee meeting on the 19 th December, and informing them that information they have supplied has been forwarded, particularly to the EA and to County Council. | |
| 21 st September 2011 | Email | Email from Rachel Nixon (County Council) to Alison Bailey Comments on Transport Sustainability Strategy and Transport Assessment The overall conclusion made by the County Council: 'at the current time further information is needed'. | Comments forwarded to West Waddy (4.10.11) |
| 4 th October 2011 | Email | Email from Alison Bailey to Caroline Longman (West Waddy) Email forwarding the comments received from the EA and Oxfordshire County Council | |
| 20 th October 2011 | Evidence submitted | Proposed Masterplan (revised October 2011) Penoyre and Prasad | Note prepared for discussion at the Labour Group Meeting (17 th November 2011) |
| 8 th December 2011 | Letter | Letter from Ruskin College to all members A letter to members encouraging support of the inclusion of the Ruskin fields development in the AAP, or in the Sites plan at the upcoming committee meeting. | |
| * 9 th December 2011 | Evidence submitted | Revised Transport Statement sent to Laura Goddard and Alison Bailey | |
| 19 th December 2011 | Committee meeting | Report seeking approval for consultation on Proposed Submission Document and thereafter submission to SoS Para 13: Ruskin Fields have not been allocated in the AAP; technical studies are not sufficiently robust to be included in the AAP. In particular, no workable vehicle access arrangement has been demonstrated and the proposals do not adequately reflect the requirement to protect and enhance the character and appearance of the Conservation Area. | |
| 10 th February – 23 rd March 2012 | Consultation period | Consultation on Proposed Submission Document and Sustainability Appraisal Report | |
| 23 rd March 2012 | Consultation response | Response focussed on comments on the Sustainability Appraisal | |
| 13 th April 2012 | Submission of AAP | | |

* N.B. at the time of submission of this Statement of Common Ground, the City Council has been unable to confirm this item of correspondence; the position will be confirmed at the Hearing Session.

Appendix B: Compilation of comments on further Ruskin submissions 15 August 2011 (part of CD7.13.1.2)

| Title | Produced by | Summary Proposals/ Main key points | Comments |
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| Headington Meads: Proposed Masterplan at Ruskin Fields | Penoyre & Prasad | <p>It is proposed that the land has capacity for around 150 new homes. The density would be of 60/65 dwellings per hectare. The principle for the masterplan is to complement the topography and landscape features.</p> <p>The development is proposed for the two fields to the northwest of Ruskin College site, closest to Foxwell Drive. The eastern field will be retained as amenity space (it is not clear whether this is public open space). Existing hedgerows will be retained and enhanced. The existing brook will be improved and used as part of a sustainable drainage systems.</p> <p>The masterplan provides a series of routes and connections (a hierarchy of green routes: a green street, green lanes, green walks and green paths).</p> <p>A green street is being proposed as the principal access and sole vehicular access into the development area from Foxwell Drive. The carriageway will be 6m wide with a 2m wide pedestrian strip along the southern side. A swale will be incorporated as part of this green street. Pedestrian bridges will cross the swale.</p> <p>The green lanes are shared surface, mainly free from car parking with a mews and courtyard typology. They are 7.5m wide, the speed is limited and parking is on plot.</p> <p>The green walks provide access to double fronted</p> | <p>Scale of development and access Scale of development is not considered appropriate for Old Headington Conservation Area. Density is high and does not result in a village feel or hamlet character development as described. It is considered it does not relate well to the scale of its surroundings.</p> <p>Providing pedestrian access to the new public open space is seen as a beneficial public amenity.</p> <p>Concept A conceptual diagram would have helped to understand the rationale behind the indicative masterplan. As a consequence, it is difficult to understand how the proposal relates to a vision for the wider area beyond the development site.</p> <p>Landscape features and A40 The topography of the site has not been fully explored.</p> <p>How are the levels dealt with on the frontages to the A40? Level changes between the site and the A40 and possibilities of addressing the A40 do not appear to have been considered.</p> <p>It is positive to see that the hedgerows would be retained and enhanced where possible. The hedgerows and the proposed swale promote local biodiversity.</p> <p>Public realm and pedestrian links A simple diagram showing active frontages would help to understand the relationship between fronts and backs with the public realm. This would also help to establish public and private space.</p> |

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| | townhouses and connect to surrounding meadows. | <p>It is not clear how the green walks be surveilled/ overlooked and how wide would these be.</p> <p>1.2 m path between perpendicular houses and swale does not seem enough. The minimum unobstructed width for pedestrians should generally be 2 m (Manual for Streets, 2007).</p> <p>Some of the pedestrian links (in particular green lanes) would be inviting for pedestrians. It is positive to see that these will be lit (TA).</p> <p>Pedestrian strip on green street could be wider (2m proposed) if the street is to be the main street through the development. Two people walking side by side with a push chair or wheel chair take about 1.5m.</p> <p>It would help to understand how the focal points would be addressed, what is located in these focal points.</p> <p>Better connections into the fields are created via existing gate on Stoke Place.</p> <p>A sketch or indicative plan showing how the courtyard development could work would be helpful. It is not clear whether these public spaces would be overlooked.</p> <p>It is considered that gable ends will not help to create a frontage to the A40. This development is an opportunity to help to achieve a street-boulevard feel for the A40 on both sides of the ring-road.</p> <p>It is important to make sure that the green walks (pedestrian-cycle access only) have natural surveillance (active fronts/ balconies/ windows).</p> <p>It is good to see that a shared surface (pedestrian-vehicle) has been explored.</p> <p>It is not clear how the existing views and vistas will be enhanced so as to help people understand and move around the place.</p> |
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| | | <p>It is positive to see that the routes and spaces within the development will be connected and interlinked. It is also positive to see that the design gives priority to easy access for pedestrians (permeable and legible streets).</p> <p>Explain the rationale behind the building heights. This will help to see whether the proposed heights would enhance the quality of a view, create a 'townscape' or provide a sense of enclosure.</p> <p>Housing The concept of perpendicular houses is not clear. An indicative sketching would help to illustrate what it is meant.</p> <p>Parking No mention of car parking on the main access/green street – will this street accommodate on-street parking perhaps? Vehicle speeds should be controlled on the green street (straight line) using careful design.</p> <p>Sustainability It is positive to see that a car-share facility will be provided as part of the development. How will this be managed and monitored?</p> <p>Swale incorporated as part of development is a very positive and interesting idea. The integration of the small stream, pond and hedgerows in the proposed masterplan suggests some positive integration of existing landscape features, while there is some potential that the creation of a 'green road' with a streetside 'swale' could help to create a distinctive, rustic streetscape that supports the rural character of the conservation area.</p> <p>Waste management for the site and within the buildings (storage and recycling) needs to be considered. It is important to think of ways that the waste collection system avoid adverse impact on the public realm.</p> |
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| <p>Planning and Urban Design Context</p> | <p>West Waddy ADP and Malcolm Moor Urban Design</p> | <p>Key design principles adopted for Ruskin Fields are as follows:</p> <ul style="list-style-type: none"> - Places for people - Make connections - Work with landscape - Design for change | <p>At this point, we cannot consider that the development proposals have sufficiently accommodated the requirement to protect and enhance the character and appearance of the conservation area and it seems unlikely that this can be achieved at the proposed density of development. Whilst the proposals are presented at a similar level of detail to those for the development site to the north of the ring road, we would expect a more detailed presentation to consider the potential direct impact of this option on the conservation area.</p> <p>The document mentions and summarises the 'Wider Vision' document submitted in April 2010. The design principles are a good basis to work on, however, they need to be explored further and explain how these will be achieved.</p> <p>The document needs to refer to Manual for Streets 2 (2011).</p> <p>Circulation plan: Isolation is seen as an attractive feature, but is very unattractive from an urban design point of view. The scale of development does not achieve a village feel (contradiction with the point on isolation).</p> <p>It is not clear how the development would be adapted to a new use or uses if the conditions change in time (design principle; Design for change).</p> <p>Figure 464-G-002 suggests different links to the one proposed by the masterplan from Penoyre and Prasad. It also assumes the location of the new Barton local centre which has not yet been decided. Not clear how the proposed pedestrian routes follow on from the existing routes.</p> |
| <p>Deliverability and Housing Need</p> | <p>Savills</p> | <p>This document demonstrates that the Headington Meads/ Ruskin Fields site would be attractive to market housing and affordable housing providers to assist the City Council to meet its housing targets, relieve the pressure on housing and complement the proposed development north of Northern bypass.</p> <p>Ruskin Fields are land designated as Flood Zone 1. The Flood Risk Assessment demonstrates that the site is not at risk from flooding from any natural or artificial source.</p> | |
| <p>Flood Risk Assessment</p> | <p>OMK Design Consultancy Ltd</p> | | <p>Relates to 193 residential units on Ruskin Fields?</p> <p>Comments from the Environment Agency</p> |

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| | <p>The FRA considers that the introduction of sustainable urban drainage techniques, SuDS, and suitable mitigation measures are introduced to control surface water runoff. Permeable paving is to be used for all areas of hard surfacing. Green roofs and rainwater harvesting systems should be considered. It is recommended that the existing ditch is retained such that a 'green corridor' can be established along with suitable planting to encourage and maintain the ecology of the area.</p> | <p>Calculated Greenfield runoff rates are acceptable. However, it is not acceptable to merely restrict surface water discharge rates to the 1 in 100 year Greenfield rate during all rainfall events. It is important that it is demonstrated that discharge rates will match Greenfield rates across a range of storm events up to and including the 1 in 100 year storm event with an allowance for climate change (the design storm event).</p> <p>Some good SuDS techniques are discussed in the FRA, but the use of cellular storage devices should be minimised due to their high maintenance requirements and lack of the environmental enhancements offered by other techniques. It is important that the whole SuDS management train is implemented as an integral part of the development, with source, site and regional control techniques included in the drainage system.</p> <p>If this development were to come forward as an outline planning application, with the layout reserved, the indicative surface water drainage layout drawing should be shown. This should clearly demonstrate that the necessary surface water attenuation storage is achievable within a development of the proposed density, using a suitable mix of SuDS techniques (supported by calculations).</p> <p>If this development were to come forward as a full planning application (layout to be fixed), the EA would like to see exactly where the necessary surface water attenuation storage will be provided using a suitable mix of SuDS techniques (supported by calculations).</p> <p>BRE 365 compliant infiltration tests should be carried out across the whole site to inform the design of the surface water drainage system. However, if the drainage system is designed based on the assumption of an infiltration rate of zero and a suitable alternative method of discharge is identified, then the infiltration tests can be delayed until a later stage.</p> <p>It must be demonstrated that the surface water drainage system will not flood</p> |
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| | | | <p>from surface water during storm events up to and including the design event. Alternatively, it could be demonstrated that any surface water flooding beyond the 1 in 30 year storm event, up to and including the design storm event would be safely contained on site.</p> <p>The future maintenance of the drainage system should be considered throughout the design stages to ensure that the system performs as designed over the lifetime of the development.</p> <p>If it is expected that this development will be constructed in a phased manner, by a number of different developers, it is good practice for a design code to be produced, which details the surface water drainage design standards that should be met on each parcel.</p> <p>See comments above</p> |
| Drainage Statement | OMK Design Consultancy Ltd | The Drainage statement confirms that mitigation measures can be put in place in accordance with PPS25 and Oxford SFRA guidance. | |
| Energy Strategy | Parsons Brinckerhoff | The Energy Strategy explores the potential for district heating from the Barton development (as the preferred solution) to be connected to the Ruskin Fields. It also looks at other options capable of delivering Code for Sustainable Homes Level 4 for and the NRIA 20% renewable levels as required by current Government policy. Of the options assessed only Photovoltaic Panels and Ground Source Heat Pumps are capable of delivering both Code Level 4 and the NRIA 20% renewable or low carbon energy targets. Gas CHP, Biomass and Solar Thermal are all assessed as being capable of achieving both targets although issues are raised concerning the financial viability of these options. An off-site connection would be required to achieve higher levels of Code compliance. | The conclusions reached by the Energy Strategy are considered reasonable in relation to be connected to a potential district heating from the Barton development. |
| Landscape and Visual | Land and Landscape | The LVIA recognises that the impact on development to the open fields is substantial to moderate. However the | At paragraph 1.1 this document fails to identify the proposal site as forming part of a conservation area and, thereafter, does not take this significance into account |

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| Impact Assessment | Management Ltd | retention of the pond and the strengthening of hedgerows can mitigate these impacts, particularly in longer views, and have the potential to create a positive impact on the landscape character of these features. The visual impact of the development to the northern fields will undoubtedly have an effect on the visual amenity of certain receptors (houses and footpaths that overlook the northern site). Means to reduce this impact include the retention of the southern and eastern fields as a landscape and visual buffer with supplementary planting which can act as a visual screen. | when considering the impact of development. As such, we cannot consider the document's findings to be valid. |
| Preliminary Ecological Assessment | EcoConsult | <p>A desk study, extended Phase 1 habitat survey, bird survey and bat survey have been carried out to identify potential ecological resources, assets impacts and propose appropriate mitigation and enhancement for proposed development at Ruskin Fields.</p> <p>The only protected species recorded at the site to date are bats and nesting birds. Mitigation has been proposed to minimise impacts to habitats and species and where possible result in a net beneficial impact.</p> <p>The documents concludes that the proposed restoration of existing features as a result of development will preserve and enhance these priority habitats while proposed open space provision will contribute to accessible green space, in line with Natural England guidelines.</p> | The surveys are up-to-date, these took place in August 2011. |
| Transport Assessment (TA) | DT Transport Planning | <p>The TA explains how access to the different transport modes other than private car are achieved, while existing junctions can accommodate the additional traffic likely to be generated.</p> <p>Access to the strategic highway network and the ring road would be made via Marsh Lane.</p> | <p>Waiting for Transport County Council comments</p> <p>Relates to 193 residential units on Ruskin Fields?</p> |

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| | | <p>The site is located in close proximity to a number of regular bus routes. Additional services are available within walking distance of the site (London Road). These services are within the 400m and 800m IHT guidelines recommendations. The site has therefore excellent accessibility to local public transport services, pedestrian and cycle routes.</p> <p>Main facilities are available at the Headington District Centre.</p> <p>Access to the site would be via Foxwell Drive via Headley Way through a simple priority junction (favoured by Oxford City Council and Oxfordshire County Council).</p> <p>Measures will be introduced within the site to ensure opportunities for non car travel are maximised as well as control vehicular access between Old Headington and Northway.</p> | |
| Transport Sustainability Strategy | DT Transport Planning | <p>This document has been produced alongside the TA.</p> <p>The proposed development will be designed so as to integrate pedestrian and cycle routes through the site, linking into existing routes in the area, and to the proposed cycleway/ footway crossing the A40 to Stoke Place.</p> <p>Measures will be introduced within the residential units to further encourage non car use.</p> <p>The document identifies the key attributes of Ruskin Fields in the context of the Old Headington Conservation Area and the settings for nearby listed buildings.</p> | Waiting for Transport County Council comments |
| Heritage Statement | West Waddy ADP | | <p>From Conservation Officer: The density and height of development proposed, is not considered to support the rural character of the conservation area or the concept of a hamlet.</p> |

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| | <p>The key functions of Ruskin Fields is to provide this visual connection between the rural foreground and background, to help to explain the development of the village and to contribute to the character of Stoke Place and the contrast with the built-up parts of the village. This document concludes that it is considered that an appropriate balance has been struck by the current proposals for the development of parts of Ruskin Fields, leaving the eastern and southern fields undeveloped and improved so as to retain visual appearance for the benefit of the public.</p> | <p>The placement of three storey blocks at the northern edge of the site (the 'perpendicular housing'), is likely to result in the creation of an unduly prominent and intrusive building line within one of the key views identified in the conservation area appraisal.</p> <p>The continued assessment of the fields within the proposal site makes only a passive contribution to the special interest and character and appearance of the conservation area does not follow logically from the findings of the conservation area appraisal.</p> <p>The fields play an important role as part of the historic interest of the village by preserving an element of the historic field system around the village that has otherwise been lost beneath suburban housing.</p> <p>These fields have particular historic interest in that their alignment (now cut across by the ring road but still preserved) is influenced by the recorded alignment of divisions within the earlier open field system (a significant feature in the evolution and location of the village), which is evidenced by surviving traces of ridge and furrow earthworks, and has influenced the alignment of the lane and bridleway at Stoke Place.</p> <p>Views across the fields from Stoke Place Bridleway and from the footpath and cycleway alongside the ring road provide a relationship between the fields and the wider conservation area, which is also contrary to the statement at 6.4. The fields make an important contribution to the character and appearance of the conservation area as a significant part of the village's rural character.</p> <p>The statement refers to the guidance of the now obsolete PPG15. The Council has limited the inclusion of fields within the conservation area to those within the ring road in recognition of their role as the immediate landscape setting of the village and the need to have special regard to the desirability of preserving and enhancing their character and appearance when fulfilling its duties as a local</p> |
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| | | | <p>planning authority.</p> <p>The Council will make decisions regarding designated heritage assets based on the guidance of Planning Policy Statement 5.</p> <p>The document has not considered the potential impact of traffic arising from the proposal on the character and appearance of the conservation area, whereas this is noted as an issue affecting the area's character and appearance and an area of vulnerability to future change.</p> <p>The report has also given little regard to the potential presence of other heritage assets within the site. The conclusions of archaeological investigations undertaken by Oxford Archaeology on behalf of Ruskin College were that the remains of activity associated with a Roman pottery kiln had been identified within the site but that the location of a kiln had not yet been determined. Given the proximity of the site to an identified site of Roman archaeological remains, forming a heritage asset we would have expected the heritage statement to include some assessment of the potential significance of these remains and the measures taken in developing the masterplan to prevent any loss of significance to them.</p> |
| Arboricultural Survey | Sylva Consultancy | <p>The trees subject to this report are located to the north of the main campus. This area is known as 'Ruskin Lower Fields' and the fields are bounded to the north by the A40.</p> <p>It is considered that the most visually significant trees/groups are the row of trees along the eastern boundary; the group around the pond and the off-site trees recorded as G2. They provide screening to the site and contribute significantly to the surrounding environment and as such are extremely desirable to retain. Whilst it is acknowledged that the majority of the Category 'C' groups and Areas have become neglected merit must be given to the contribution that these provide to the site. As such it is recommended that consideration regarding</p> | |

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| | | the retention is undertaken as they provide valuable green corridors and connectivity to the wider landscape. | |
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Appendix C: Oxford City Council planning officer note on the Ruskin Fields proposal

Update on Ruskin Fields proposal (September 2011)

Ruskin Fields in Barton Area Action Plan Preferred Options document

The proposal for Ruskin Fields, presented by Ruskin College, was included as part of the Barton Area Action Plan (AAP) Preferred Options document published in May 2011.

Ruskin College's site amounts to 6.5 hectares and sits between Dunstan Road in Old Headington and the ring-road. The whole extent of the Ruskin land (comprising academic teaching buildings and accommodation, landscaped gardens, listed buildings and three fields) falls within the Old Headington Conservation Area. The college occupies the most southerly part of the site closest to Dunstan Road. To the north of the land occupied by the college buildings, the Ruskin site slopes down towards the ring-road immediately to the north-west.

Ruskin College was seeking development of between 175 and 193 new homes on the three fields (Ruskin Fields) immediately to the north of its buildings (about 3.5 hectares). A smaller proposal was also put forward.

Status of the proposals

Ruskin College's proposal was introduced in a separate chapter within the AAP. A smaller scale proposal was also presented in the document. The status of the proposal was different from those set out elsewhere in the document. The proposal had been promoted by the landowner and had not been developed with the same ongoing and close involvement of the local community and other stakeholders.

Issues flagged up in the Preferred Options and SA

At Preferred Options stage, the Ruskin proposal was not supported by specific and up-to-date evidence, particularly in terms of traffic modelling.

The following issues were flagged up in the Preferred Options document:

- One of the AAP objective is to ensure that there is no private vehicle access between the new development on the Land at Barton and Northway – access via Foxwell Drive would generate more trips through Northway
- Vehicle access from the ring-road (or parallel service road) with vehicle access via Foxwell Drive could cause rat-running in Northway and Old Headington.
- The scale of the proposal seems likely to affect the character of this part of the Old Headington Conservation Area.
- Ruskin Fields were already identified then in the Consultation Draft Conservation Appraisal as contributing to the rural character and historic character of Old Headington. The view from Stoke Place across the Ruskin Fields to Elsfield is one of the most sensitive across and out of the Conservation Area.
- Access from Ruskin Fields onto the ring-road could conflict with the proposed route of the Eastern Arc Rapid Transit

The Sustainability Appraisal (SA) report was prepared to accompany the Barton Area Action Plan (AAP) Preferred Options document.

No preferred option was identified in the AAP Preferred Options document. The SA assessed three reasonable options (option 1 being 'do nothing scenario', option 2 being the original proposal and option 3 being the smaller scale proposal). It was found that the original proposal

for a large residential development could potentially have significant negative impacts on sustainability, such as flooding, air pollution, climate change, biodiversity and traffic congestion. Insufficient detailed evidence was provided to assess these potentially adverse impacts. It was considered that the smaller scale development could still have some negative impacts, all of which could only be explored further through more detailed assessments.

Preferred Options consultation

A questionnaire was put together as part for the consultation process for the AAP Preferred Options stage. Two questions within this questionnaire related to Ruskin Fields. Views on the proposal put forward by Ruskin as well as a smaller scale development on the same location were sought. Overall, most respondents expressed their opposition to Ruskin College proposals. 63% of the respondents disagreed with the large-scale proposal and another 58% of the respondents did not support the small-scale proposal. A large majority of the opposition came from Old Headington, Northway and Headington.

Reasons for this opposition are listed below:

- The Ruskin Fields are part of the Old Headington Conservation Area and participate in its rural character;
- Such a development in a conservation area could set a negative precedent in Oxford and lead to green field developments in similar areas;
- The proposals could lead to an increase in traffic in Old Headington and Northway, and could have a negative impact in terms of pollution.

Specific issues raised by respondents also included the lack of ecological information on the site and the need for more studies on vehicular access.

A few respondents mentioned the possibility of having the Ruskin Fields provide a public green space area or/ and allotments that would benefit both existing Old Headington residents and new Barton residents.

Comments in support of the proposals included: the potential benefit in terms of bus viability between the John Radcliffe Hospital and the Barton development, the importance of having building frontages on both sides of the ring-road in order to change its overall character, and the contribution of the site in terms of affordable housing provision for Oxford.

A petition was received from Friends of Old Headington against the Ruskin Field proposals. Over 400 people signed this petition. Another petition with 14 signatures in favour of housing on Ruskin Fields was received.

Ruskin representations and supporting documents

As part of the consultation response, West Waddy (Ruskin's planning consultants) submitted a set of documents and representations.

In their response, they suggest the opportunity for commercial activity and other community facilities along with local neighbourhood shops and employment fronting the A40 in order to generate activity. The scale of the development along the boulevard could be between 4 and 6 storeys. No response was received on the smaller scale proposal.

Following the consultation, Ruskin's consultants met with the officers on 13 July 2011 to discuss the representations. Officers stressed that further work was required before proposals could be properly considered, including a full Transport Assessment covering trip generation and the suitability of access.

Ruskin's revised proposal

Further technical studies were received by the Council on 15 August 2011. The list of documents received can be found below:

- Deliverability and Housing Need
- Flood Risk Assessment and Drainage Statement
- Energy Strategy
- Landscape and Visual Impact Assessment
- Preliminary Ecological assessment
- Transport Assessment
- Transport Sustainability Strategy
- Heritage Statement
- Planning and Urban Design context
- Headington Meads proposed Masterplan

The revised proposal is for around 150 new homes. The density proposed is 60/ 65 dwellings per hectare. The development is proposed for the two fields to the northwest of the College site, closest to Foxwell Drive. The eastern field will be retained as amenity space (it is not clear whether this is public open space). Existing hedgerows will be retained and enhanced. The existing brook will be improved and used as part of a sustainable drainage system.

Access to the strategic highway network and the ring road would be made via Marsh Lane. Access to the site would be via Foxwell Drive via Headley Way through a simple priority junction.

Addressing the issues previously highlighted

The City Council acknowledges that the further documents that have been submitted allows the Council to make a better judgement of what the impacts would be. However, there are still a few issues which are considered not acceptable. These are highlighted below:

- the density and height of development proposed is not considered to support the rural character of the conservation area or the concept of a hamlet
- the development proposals have not sufficiently accommodated the requirement to protect and enhance the character and appearance of the conservation area
- the Landscape and Visual Impact Assessment fails to identify the proposal site as forming part of a conservation area and, thereafter, does not take this significance into account when considering the impact of development
- the placement of three storey blocks at the northern edge of the site is likely to result in the creation of an unduly prominent and intrusive building line within one of the key views identified in the conservation area appraisal
- the proposal has not considered the potential impact of traffic arising from the development on the character and appearance of the conservation area, whereas this is noted as an issue affecting the area's character and appearance and an area of vulnerability to future change
- vehicle access via Foxwell Drive could cause rat-running in Northway and Old Headington. Traffic management measures as a result of this development have not been fully explored (note that we are still awaiting for County Council's comments).
- Traffic impacts on Marsh Lane and Headley Way have not been considered.

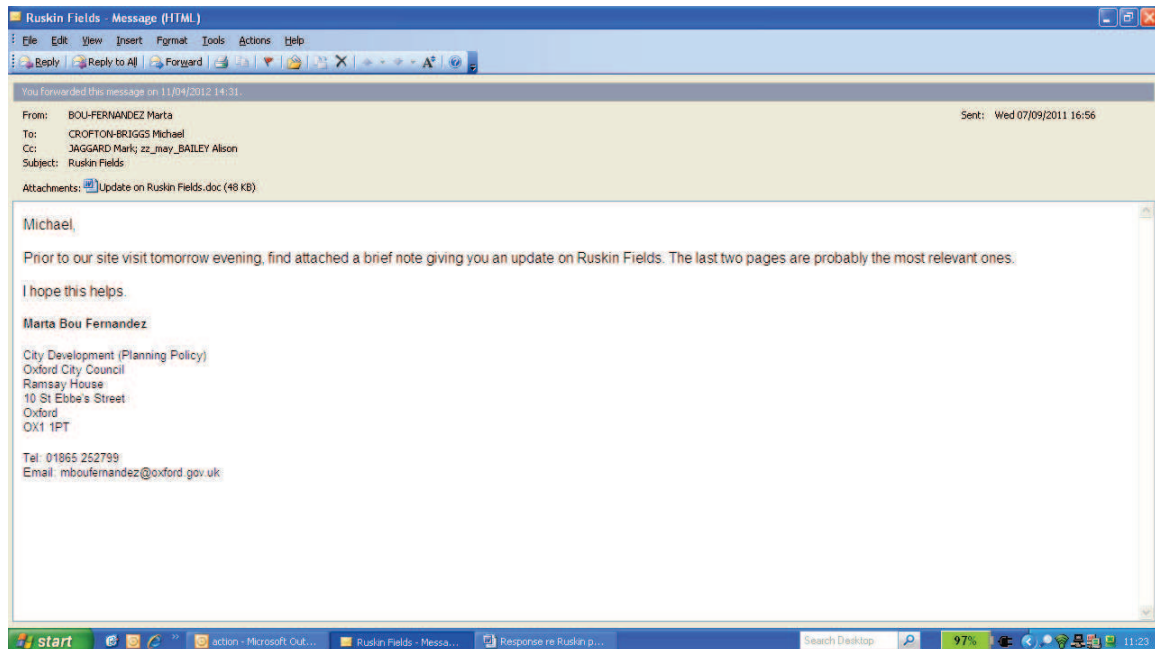
The Transport Assessment and Transport Sustainability Strategy have been sent to the County Council for comment. The Flood Risk Assessment and the Drainage Strategy have been sent to the Environment Agency for comment. We are still waiting for the comments on both.

Strengths of the revised proposal

The following are considered strengths of the Ruskin proposal:

- The proposal would help to meet the city council's housing targets. The creation of access to the eastern of the three Ruskin Fields is seen as a beneficial public amenity.
- The integration of the small stream, pond and hedgerows in the proposed masterplan suggests some positive integration of existing landscape features, while there is some potential that the creation of a 'green road' with a streetside 'swale' could help to create a distinctive, rustic streetscape that supports the rural character of the conservation area. The swale would also create a wildlife corridor.

The original email is attached from which this attachment came is below (see date: 07/09/2011)



City Development

Addendum to the Sustainability Appraisal for the Sites and Housing Plan

July 2012

www.oxford.gov.uk



Ruskin Fields Sustainability Appraisal for the Sites and Housing Plan

The sustainability appraisal for the sites section of the Sites and Housing Plan was published in February 2012. This did not include the Ruskin Fields site because that site was considered as part of the Barton Area Action Plan sustainability appraisal.

The sustainability appraisal undertaken at preferred options for the Barton AAP was dated April 2011 and the SA for sites (preferred options) was dated June 2011.

- In August 2011, Ruskin College and its agents West-Waddy provided a wide range of additional information;
- In September 2011, planning officers and councillors visited the site;
- In December 2011, the City Council made a decision to not include Ruskin Fields in the Barton AAP ; and
- In June 2012, Ruskin College and West-Waddy put forward more detailed proposals for a smaller development.

The Planning Inspector for the Barton AAP and Sites and Housing Plan requested that the additional information submitted should be more clearly documented and commented upon in the sustainability appraisal of the AAP. It was also decided that Ruskin Fields would be considered as an omissions site at the hearing sessions for the Sites and Housing Plan. Ruskin Fields site has therefore been appraised as a potential site for inclusion in the Sites and Housing Plan.

This addendum to the 2012 sustainability appraisal for the sites section of the Sites and Housing DPD ('the 2012 SA') considers the impacts of Ruskin Fields as a site for inclusion within the Sites and Housing Plan.

Filtering of sites (Pre-Options stage filtering)

The 2012 SA noted that, of an initial long list of about 200 sites initially considered, 121 sites were filtered out because of the following reasons:


- they were too small,
- they were already progressing through the planning process,
- they were in areas prone to flooding, or
- they were in biodiversity designations, Green Belt, greenfield or Green Infrastructure
- they had planning constraints such as heritage, shape of the site, trees etc
- they were undeliverable, for instance because the landowner was unknown or not interested in developing the site

Following this filtering process, had Ruskin Fields been considered in the Sites SA, it would have progressed to the next stage and been considered as part of the Preferred Options appraisal (June 2011). For the purposes of this process to demonstrate the likely SA outcomes, the site has therefore been assessed using the Sites Pro Forma (using the methodology set out in the SA for the sites section of the Sites and Housing Plan.

Appraisal of Ruskin Fields

Although the site scores positively in terms of housing, if developed (for either a small or large scheme), it would have, based on the evidence submitted, significant effects on the Old Headington Conservation Area and the biodiversity of the site. As such the SA has suggested that the preferred option for the site would be “do not allocate”.

Table 1. Site appraisal for Ruskin Fields

| | | | |
|---|--|----------|----------|
| <u>Site Reference:</u> | <u>Map:</u> | | |
| <u>Location:</u> Ruskin Fields |  | | |
| <u>Assumed Capacity:</u> 3.5 ha | | | |
| Top level Assessment (sieve 1) | | | |
| Flood Risk (SFRA Zones) | Flood zone 1 | | |
| Ecology/ Biodiversity Designation | Outside ecological designation | | |
| <u>Key Issues</u> | | | |
| Second level assessment (2 nd sieve) | | | |
| Flooding access/ egress | Outside flood plain | | |
| Type of Land | Site is unprotected open space | | |
| Archaeology | No Scheduled Ancient Monuments, Registered Parks and Gardens or Historic Battlefields are within or in close proximity to the site. The site (including the Ruskin College buildings) lies within a known area of Romano-British activity. It has high potential for Roman and Post-Medieval/Modern archaeological deposits. | | |
| Conservation Areas | Within Old Headington Conservation Area. Development would affect the open nature of the site, which is important for the conservation area | | |
| Listed Buildings | The site allows views to/from The Rookery, a Grade II listed building | | |
| View Cones | Not within view cone | | |
| High Buildings Area | Outside of high buildings area | | |
| Distance from Rail Station | It is over 20 minutes to the railway station (on foot, cycle or public transport) | | |
| Distance from Bus Stop | The nearest bus stop is in Halliday Hill which is around 400m from the site. | | |
| Air Quality | City-wide AQMA | | |
| Regeneration Areas | The site of Ruskin Fields is within 50m of the Northway Regeneration Area | | |
| Schools | More than 800m from a school | | |
| GP Surgeries | Within 800m of a GP Surgery | | |
| Post Office | Within 800m of a Post office | | |
| Housing | Option 1 | Option 2 | Option 3 |
| Public open space | Option 1 | Option 2 | Option 3 |
| Economic growth | Option 1 | Option 2 | Option 3 |
| <u>Constraints:</u> | | | |

Despite scoring neutral for being within a Conservation Area, it is worth noting that the site is within a sensitive part of the Old Headington Conservation Area. Oxford City Council's Old Headington Conservation Area Appraisal provides more detail on the particular characteristics of this Conservation Area.

Analysis

This site is Greenfield. It is accessible by public transport and has some local services nearby. There are three options for this site:

Option 1 (non-allocation of the site) would not lead to the provision of affordable housing or the opening up of the site to public access. However it would protect the views into and out of the Old Headington Conservation Area and protect the biodiversity of the site.

Option 2 (allocate for 150-193 dwellings): This option would promote the efficient use of the site. It would be likely to deliver 50% affordable housing, and could also deliver some public open space. However it would have significant effects on the Old Headington Conservation Area and the biodiversity of the site. The site is not particularly well connected to local services, and would offer no new services.

Option 3: (allocate for 69-70 dwellings): This option would result in lower levels of housing and affordable housing, but larger amounts of publicly accessible open space. It would have the same limitations as Option 2 in terms of the conservation area, biodiversity and access to / provision of local services.

Option 1 is therefore the preferred option.

Site Carried forward: ~~Yes~~ / No

Specific considerations for new policy

