City Development

www.oxford.gov.uk

OXFORD CITY COUNCIL

Addendum to the Sustainability Appraisal for the Barton Area Action Plan

July 2012

Contents

Introduction **3**

Assessments:
MM1: Model Policy **4**
MM4 & MM6: Proposed changes to Policies BA1 and BA7 **7**
Ruskin Fields **17**

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*** 10. Unless material considerations indicate otherwise" "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:*** • ***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:*** • ***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.*** ***10. Unless material considerations indicate otherwise***" (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 where~~ver~~ 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

- Option1 (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 **SA Objectives**	**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**
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	√?	√	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 √ √	
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 **SA Objectives**	**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**
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 **SA Objectives**	**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**
length and duration of journeys and reducing the need to travel by car/lorry		√X	√X	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 **SA Objectives**	**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**
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 **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**
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**
	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. 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.					

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**
Objective 1: to reduce the risk of flooding and the resulting detriment to public well-being, the economy and the environment	–	-?	-?	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. 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: *"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).* *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.*

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**
				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). *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).* *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.* *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.* *The future maintenance of the drainage system should be considered throughout the design stages to ensure that the system performs as designed*

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**
				over the lifetime of the development."
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		X√	X√	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	_	√ √	√	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	-	√	√?	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). Better management of the existing Ruskin Fields under a 'do nothing' option, for instance through tree planting, could deliver greater climate change benefits.
Objective 13: to conserve and enhance Oxford's biodiversity	√	X X	XX	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**
				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. 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). 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. 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. The ecological assessment (Appendix F) suggests that, after mitigation and enhancement, most of the biodiversity effects of new development would be

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**
				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 England[1] notes that "*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)*". 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. However, the City Council's ecologist has indicated that the existence in the

[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	An archaeological assessment of July 2006 (Appendix D) suggests that development at the site could have significant archaeological impacts: *"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".* 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: *"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,*

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**
				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… *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."* However, Oxford City Council's subsequent Old Headington Conservation Area Appraisal of July 2011 notes that the green fields in the conservation area provide "*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….*

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**
				Stoke Place is continued within this area as an attractive public bridleway running northwards from the Dunstan Road Character Area lined by trees that help green it. The bridleway runs up to the ring road between land owned by Ruskin College and other privately owned fields. To the west, iron railings with an unusual gate form a distinctive boundary to Ruskin College's land, allowing views across it to the countryside beyond.... The ability to walk just a few hundred yards from the tightly enclosed village centre to a point with such a rural character and wide open views over the landscape is an important part of the special character of Old Headington. The path also benefits from greenery of the verge, which includes carpets of flowers of wild garlic, as well as bluebells in late spring. The rural character of the path was highlighted in 29 responses (46 % of the total number) to public consultation on the draft appraisal, which highlighted the rural quality of the bridleway as a key feature of the conservation area. *The ring road and the adjacent footpath and cycleway run along the edge of this area, allowing glimpsed views through the hedgerows and tree-lines up to the village. In particular these views cross the land owned by Ruskin College with Ruskin Hall forming a prominent feature... 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."* Ruskin's Appendix B notes that *"The visual impact of the development of the northern field will undoubtedly have an effect on the visual amenity of certain receptors... So long as development is sensitively designed, and maintains as far as possible the existing green field and hedge boundary pattern, then any development is likely not to result in any significant impact from a distance".* Policy CS18 of the Core Strategy states that *"Development must not result in*

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**
				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." 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.
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	_	X X	X	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. Both Options 2 and 3 would promote walking and cycling in the form 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**
				foot/cycle paths. However the 150 dwelling option is expected to generate around 650 trips over a 12 hour period (Appendix S), and even the smaller option is expected to generate around 300 car journeys over a 12 hour period (Appendix T). These trips would be channelled onto the network of residential roads branching off Foxwell Drive. Both transport assessments suggest possible measures to discourage potential rat-running through Old Headington, including the possibility of physical restrictions in the form of rising bollards and associated signs and road markings in a location on Dunstan Road immediately north of its junction with Saxon Way. Oxfordshire County Council Highways have commented as follows on option 3: ***General comments***: • *The site is in an accessible location in relation to employment and Headington District Centre* • *Development must demonstrate that the houses can be made attractive and be designed to avoid noise, air quality or other problems that the county council would need to address in the future.* • *No assumptions should be made about changes to the speed limit or traffic management on the A40. The development should be acceptable from an attractiveness / health / noise / air quality perspective for the current speed limit. Consideration should be given as to whether the properties should be set back to the same building line as properties on Foxwell Drive and buffer planting strip included into the proposals* • *The proposal does not appear to have any direct implications for delivery*

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 Eastern Arc Strategy but this will need to be considered by the developer as part of a planning application ***Access:*** • *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* ***Potential benefits for pedestrians and cyclists (depending on final layout):*** • *More route choice for access to ring road cycle track* • *More route choice for access to / from Barton via site access junction* ***Trip generation:*** • *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.* ***Parking:*** • *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				
SA Objectives	**Option 1** 'Do nothing'	**Option 2** Larger (2011) proposal	**Option 3** Smaller (2012) proposal	**Comments**
				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.
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 moret 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
4th 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)
9th April 2010	Evidence submitted	Evidence submitted • 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)
14th May 2010	Evidence submitted	Barton AAP – The Wider Vision (Jan 2010) Landscape and Visual Impact Assessment (May 2010)	
24th May 2010	Evidence submitted	Heritage Statement (05/2010)	
19th 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	
11th June – 23rd July 2010	Consultation period	Consultation on Issues Document and Sustainability Appraisal Scoping Report	
15th 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

3rd August 2010	Meeting	Cllr Colin Cook (City) Audrey Mullender (Ruskin College) and John Ashton (West Waddy ADP)	
3rd 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.	
9th 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.	
10th 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	
21st 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
24th 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.	
13th April 2011	Committee meeting	City Executive Board approve Preferred Options Document for consultation	
13th May – 24th June 2011	Consultation period	Consultation on Preferred Options Document and Sustainability Appraisal Report	
24th 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)	
16th June 2011	Meeting	Stakeholder Briefing Event (attended by Ruskin College and West Waddy)	
6th July 2011	Committee Meeting	East Area Planning Committee endorse the final Old Headington Conservation Area Appraisal	

13th 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.	
26th 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	
4th 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.	
15th August 2011	Evidence submitted	• 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
17th August 2011	Email	Email invite from Audrey Mullender to All Members Invitation to visit Ruskin fields on the 8th September, to discuss thoughts about the site.	
25th August 2011	Email	Email from Audrey Mullender to Michael Crofton-Briggs Extending the invite to City Council officers	
25th 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	
5th 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)

		the future including calculations.	
8th 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.	
6th September 2011	Email	Email from Alison Bailey to Caroline Longman (West Waddy) An email confirming the Committee meeting on the 19th December, and informing them that information they have supplied has been forwarded, particularly to the EA and to County Council.	
21st 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)
4th October 2011	Email	Email from Alison Bailey to Caroline Longman (West Waddy) Email forwarding the comments received from the EA and Oxfordshire County Council	
20th October 2011	Evidence submitted	Proposed Masterplan (revised October 2011) Penoyre and Prasad	Note prepared for discussion at the Labour Group Meeting (17th November 2011)
8th 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.	
* 9th December 2011	Evidence submitted	Revised Transport Statement sent to Laura Goddard and Alison Bailey	
19th 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.	
10th February – 23rd March 2012	Consultation period	Consultation on Proposed Submission Document and Sustainability Appraisal Report	
23rd March 2012	Consultation response	Response focussed on comments on the Sustainability Appraisal	
13th 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
Headington Meads: Proposed Masterplan at Ruskin Fields	Penoyre & Prasad	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. 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. The masterplan provides a series of routes and connections (a hierarchy of green routes: a green street, green lanes, green walks and green paths). 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. 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. The green walks provide access to double fronted	**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. Providing pedestrian access to the new public open space is seen as a beneficial public amenity. **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. **Landscape features and A40** The topography of the site has not been fully explored. 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. It is positive to see that the hedgerows would be retained and enhanced where possible. The hedgerows and the proposed swale promote local biodiversity. **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.

		townhouses and connect to surrounding meadows.	It is not clear how the green walks be surveilled/ overlooked and how wide would these be. 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). 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). 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. It would help to understand how the focal points would be addressed, what is located in these focal points. Better connections into the fields are created via existing gate on Stoke Place. 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. 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. It is important to make sure that the green walks (pedestrian-cycle access only) have natural surveillance (active fronts/ balconies/ windows). It is good to see that a shared surface (pedestrian-vehicle) has been explored. It is not clear how the existing views and vistas will be enhanced so as to help people understand and move around the place.

			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). 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. **Housing** The concept of perpendicular houses is not clear. An indicative sketching would help to illustrate what it is meant. **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. **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? 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. 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.

			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.
Planning and Urban Design Context	West Waddy ADP and Malcolm Moor Urban Design	Key design principles adopted for Ruskin Fields are as follows: - Places for people - Make connections - Work with landscape - Design for change	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. The document needs to refer to Manual for Streets 2 (2011). 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). 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). 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.
Deliverability and Housing Need	Savills	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, relive the pressure on housing and complement the proposed development north of Northern bypass.	
Flood Risk Assessment	OMK Design Consultancy Ltd	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.	Relates to 193 residential units on Ruskin Fields? Comments from the Environment Agency

		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.	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). 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. 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). 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). 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. 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. 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. 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.
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.	See comments above
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 ot 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 Lanscape	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

Impact Assessment	Managemen t 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	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. 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. 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.	The surveys are up-to-date, these took place in August 2011.
Transport Assessment (TA)	DT Transport Planning	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. Access to the strategic highway network and the ring road would be made via Marsh Lane.	Waiting for Transport County Council comments Relates to 193 residential units on Ruskin Fields?

		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. Main facilities are available at the Headington District Centre. 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). 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.	
Transport Sustainability Strategy	DT Transport Planning	This document has been produced alongside the TA. 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. Measures will be introduced within the residential units to further encourage non car use.	Waiting for Transport County Council comments
Heritage Statement	West Waddy ADP	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.	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.

		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.	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. 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. 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. 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. 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. 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

			planning authority. The Council will make decisions regarding designated heritage assets based on the guidance of Planning Policy Statement 5. 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. 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.
Arboricultural Survey	Sylva Consultancy	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. 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 tress 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	

		the retention is undertaken as they provide valuable green corridors and connectivity to the wider landscape.	

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.

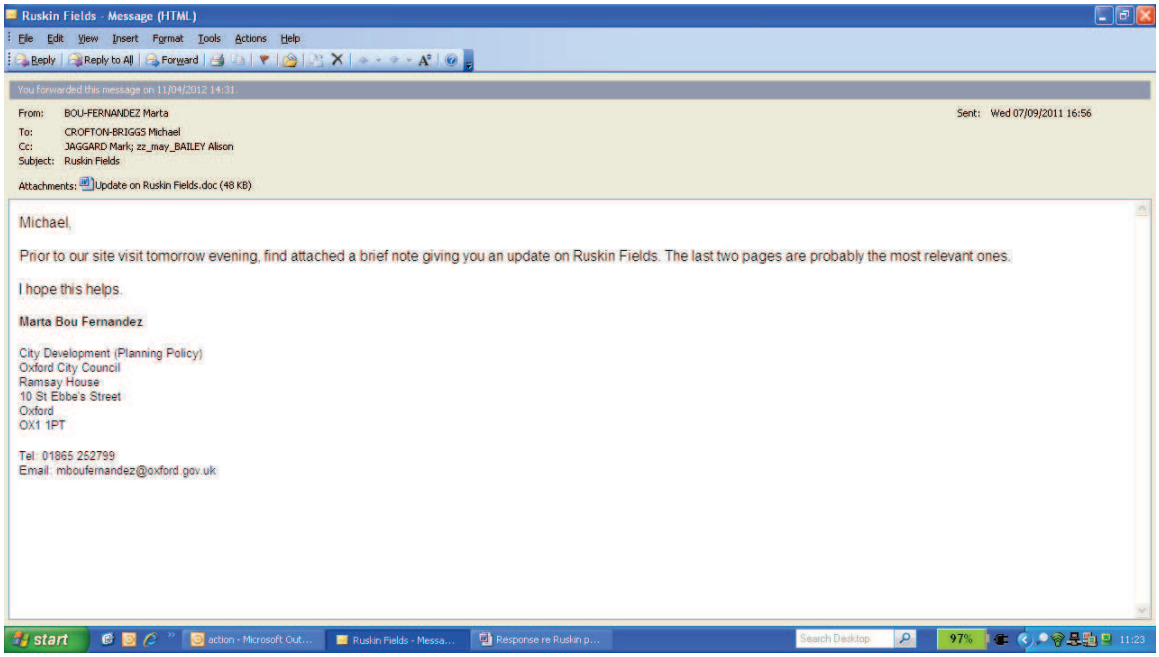
The Transport Assessment and Transport Sustainability Strategy have been sent to the County Council for comment. The Flood Risk Assessment and the Drainage Strategy have been sent to the Environment Agency for comment. We are still waiting for the comments on both.

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)



Ruskin Fields - Message (HTML)

File Edit View Insert Format Tools Actions Help

Reply | Reply to All | Forward

You forwarded this message on 11/04/2012 14:31.

From: BOU-FERNANDEZ Marta
Sent: Wed 07/09/2011 16:56
To: CROFTON-BRIGGS Michael
Cc: JAGGARD Mark; zz_may_BAILEY Alison
Subject: Ruskin Fields
Attachments: Update on Ruskin Fields.doc (48 KB)

Michael,

Prior to our site visit tomorrow evening, find attached a brief note giving you an update on Ruskin Fields. The last two pages are probably the most relevant ones.

I hope this helps.

Marta Bou Fernandez

City Development (Planning Policy)
Oxford City Council
Ramsay House
10 St Ebbe's Street
Oxford
OX1 1PT

Tel: 01865 252799
Email: mboufernandez@oxford.gov.uk

start | action - Microsoft Out... | Ruskin Fields - Messa... | Response re Ruskin p... | Search Desktop | 97% | 11:23