

23 August 2013

Ref: GLA/PRG/119

Angela Fettiplace
Oxford City Council
109 St Aldate's Chambers,
St Aldate's,
Oxford,
OX1 1DS

Dear Ms Fettiplace

Former Ruskin College Site, Walton Street, Oxford
Application Ref: 13/00832/FUL and 13/01075/LBD

I refer to my previous letter of representation on behalf of Worcester College dated 22 May 2013 and to our recent telephone conversation in respect of the above applications. This letter constitutes the considered views of Worcester College in respect of the applicant's revised proposals submitted in response to concerns raised by English Heritage, Oxford City Council officers and others.

Since writing our first letter of representation we note that the required application for listed building consent has been submitted, and that comments from statutory consultees have been sought accordingly. In this respect we note that no additional consultation response has been forthcoming from English Heritage, and that the original response on the planning application has simply been 'recycled'. A further letter of objection has however been submitted by the Victorian Society in respect of the application for listed building consent. Consultation responses relating specifically to the listed building consent application have also been submitted by the Ancient Monuments Society and the Georgian Group, both of whom entirely endorse the strong objection of the Victorian Society on the basis of the substantial harm caused to the listed 1913 building, and wider impacts on heritage assets in the area. We can see no evidence of re-consultation with statutory consultees in respect of the revised proposals, and trust that this will be done before the application is reported to the Council's Planning Committee.

Comments on revised proposals

The rationale behind the revised proposals is explained in a Supplementary Planning Document prepared by Turnberry Planning dated 3 July 2013. This in turn was followed up by a set of corresponding revised planning drawings and an accompanying letter dated 23 July 2013. The Supplementary Planning Document submitted on behalf of the applicant refers, at paragraph 2.0, to various consultation meetings held since the submission of the original application. Significantly, however, it should be noted that Exeter College has not sought to engage in further consultation with Worcester College as the principal adjoining neighbour.

For the most part the proposed amendments put forward by the applicants are of a minor 'tweaking' nature, and do not result in any significant change to the overall scale, massing or design concept of the proposals. The letter from Turnberry Planning dated 23 July 2013 summarises the proposed amendments to the application, and we have therefore structured our comments, where relevant, around the headings of the letter as follows:

Worcester Place dormers

In response to concerns raised by the South Jericho Residents Association the applicants have modified the position of three of the proposed dormers within the north-facing roof slope that overlooks Worcester place. This small change would have a modestly beneficial visual

impact in a localised part of the proposed development. However, overall the dormer windows would still appear inelegant and box-like in proportion, and would result in an incongruous, disproportionate and visually 'top-heavy' relationship with the retained facades.

Windows in the Ruskin building

In response to concerns raised by the Council's Conservation Officer and English Heritage, the original proposals to replace all of the windows in the 1913 Ruskin building with bronze finished casement windows has been reviewed. It is now proposed to install replacement windows with glazing bars on a 'like-for-like' basis, details of which would be subject to a planning condition. This change, whilst modest in scope, would be of benefit as it will show greater respect for the listed building, and distinguish it from the proposed new extension.

Ground floor window aprons

A minor change is proposed in respect of the lowering of the ground floor window cills, such that the degree of alteration has been lessened. This change will result in a modest improvement to the originally proposed scheme.

Roof material

A dominant element of the application proposals is the creation of a steeply-pitched curving mansard roof covered with 'Rinex' patinated stainless steel cladding of chequer board appearance. Previously we have commented that this would result in a jarring juxtaposition with the retained elements of the original building. We understand that the applicants have submitted a sample of a modified version of the oxidised steel 'tiles', which has been sandblasted to achieve a less reflective matt finish. The sandblasting of the material would doubtless have the effect of reducing sheen and prominence of the roof covering, but we remain concerned about the adverse visual impact that such a large expanse of alien roof material would have on both the listed building and heritage assets in the wider area. We also remain entirely unconvinced of the architectural validity of unifying the remnants of the original building with the architecturally contrasting new building under a continuous modern curving roof, which we consider to be a flawed concept that confuses old with new.

West Wing roof and dormers

The applicants propose some very minor modifications to the design of the south-facing elevation towards Worcester College, in the form of the elongation of the third floor dormer windows, which it is claimed will 'introduce greater complexity into the elevation'. These small changes may well lead to a very modest improvement to the proportions of the elevation, but will do nothing to address the fundamental concerns that Worcester College has about the overbearing scale and massing of the development and its consequent impact on the setting of the College and gardens. At paragraph 3.5.1 of the Supplementary Planning Document prepared by Turnberry Planning it is stated that the proposed new development follows the precedent of the 2006 Worcester College building 'being the same height in elevation albeit with an additional floor within the roof'. Clearly this statement is somewhat disingenuous since the Worcester College building has an extremely shallow roof, containing no dormers or accommodation. In contrast, the proposed building, with its high curving roof, covered with assertive metal sheeting, and containing very large dormer windows, would clearly have much greater impact on the setting of the historic gardens and buildings of Worcester College. The height differential is nearly six metres. The applicant's agents seek to justify the greater visual impact of proposed development on the basis that the setting of the Worcester College garden is already affected by the presence of car parking and maintenance buildings.

The latest iteration of the Heritage Impact Assessment submitted in support of the application now accepts that the Radcliffe Observatory and Worcester College were aligned on the

meridian line. However, it asserts that there is no longer any intervisibility between the two buildings. This statement is factually incorrect. Whilst the views between the two structures have been obscured at lower level by later intervening development, visibility remains between both buildings at upper storey level. Such visibility would be lost should the current proposal be approved. In recent years Oxford City Council has sought to limit the height of new development in this part of Oxford. Specifically, the height of the 2006 Worcester College Ruskin Lane development was suppressed at the request of planning and conservation officers. It would therefore be iniquitous if the same height restrictions were not imposed on the current development at the western end of the Ruskin College site.

Conclusions

As stated in previous correspondence, the principle of the re-use of the former Ruskin College Buildings for academic purposes is supported by Worcester College. However, Worcester College considers that the proposals, in their revised form, remain inappropriately designed. The proposals are un-neighbourly, excessive in scale, extremely harmful to the significance of the listed former Ruskin College building, and damaging to the setting of a number of important designated heritage assets in the immediate vicinity. As such, the proposals are in conflict with both national and local policy, and the statutory duties under sections 16, 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

Whilst some modest improvements have been made to the proposals, little has been done to address the fundamental concerns of Worcester College. Specifically, nothing has been done to lessen the harm caused to the setting of the Grade II* Worcester College Gardens, the Grade I listed buildings at Worcester College, resulting from the overbearing scale and massing of the development. Similarly, little has been done to reduce the adverse impact that the proposed development would have on the character and appearance of the Central Oxford and Jericho Conservation Areas. Crucially, no compelling case has been put forward to justify the *substantial harm* that would be caused to the significance of the newly-listed Ruskin College building as a result of the substantial demolition of its fabric, with the exception of the facades to Walton Street and Worcester Place. Indeed, the updated Heritage Assessment merely asserts that the plan layout was altered from its original concept, was subject to later alteration, and that little of significance would be lost. Such a destructive approach would make nonsense of the statutory listing of the building only four months ago.

The statutory tests and Central Government policy on the historic environment set out in the paragraphs 133 and 134 of the NPPF require that the harm caused to designated heritage assets must be weighed against the public benefits of the proposal. Worcester College considers that the applicant has failed to demonstrate that the substantial harm caused is necessary to achieve substantial public benefits that outweigh the harm or loss. In short, it has not been demonstrated that the objective of re-using the site could be achieved without the degree of loss and damage that is currently proposed.

For the reasons outlined above Worcester College maintains its strong objection to the proposals, and urges the Oxford City Council to refuse the applications for planning permission and listed building consent.

Yours sincerely



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On behalf of Worcester College