OXFORDSHIRE ARCHITECTURAL AND HISTORICAL SOCIETY

Registered charity no. 259055

Listed Buildings Sub-Committee

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Mr Michael Crofton-Briggs Planning Control and Conservation Manager Oxford City Council St Aldate's Chambers 109 St Aldate's Oxford OX1 1DS

13 May 2013

Our ref: 15/13

Dear Mr Crofton-Briggs

Re: 13/00837/CAC & 13/00832/FUL

Former Ruskin College site, Walton Street, Oxford

Redevelopment of existing student accommodation and teaching site, comprising the demolition of all buildings, with exception of the 1913 Ruskin College facade to Walton Street and Worcester Place, and erection of 90 student study rooms, 3 fellows/staff residential rooms, teaching facilities, library archive social space, landscaping and associated works.

Our caseworkers have examined these proposals, and we wish to object to them on the following grounds:

- 1. The Environmental Impact Assessment Screening Option is flawed in respect of the answer to question 6, 'Is the development of more than local significance...?' which has been answered in the negative, whereas it is clear from the interest taken in the scheme by national bodies such as the Victorian Society, that the building is of national significance, and the site has considerable environmental sensitivity. In view of a recent planning approval given in Oxford City where the lack of an EIA has resulted in a disputed decision, we would urge the council to reconsider this and require the applicants to prepare an EIA which should take into account the points made by the Victorian Society and certain others as detailed below.
- 2. The damage to the 1913 Ruskin College building is excessive and unacceptable:
 - a. More of the interior should be retained, in particular the fine rear wall of the 1913 building. The proposal documents claim to treat the building as if it were listed, yet the total destruction of everything but the façade makes a mockery of this ideal. The applicants should be asked to submit new proposals which work with the grain of the present building, not against it.

continued overleaf.....

b. The alterations to the Walton Street façade are a great disappointment. Removal of the steps and extending the height of the windows will make a nonsense of the proportions and articulation of the frontage. The façade is not, of course, 'correctly' classical in any case, but the ground floor is rusticated to a degree and acts as a plinth for the brickwork above. Dropping the window sills will elongate the windows even more than already and the result will be extremely odd-looking. While we welcome the retention of the foundation stones, we are concerned that in a lower position these will be more vulnerable to damage, either wilful or accidental (through bicycles leaning against them or pavement cleaning activity). We do not accept that the statements in response to comments made during the consultation process alleviate these concerns in any significant way.

In addition we object to the other proposed alterations to the fenestration of the 1913 building – the glazing bars of the present windows should be retained, and surviving sashes and casements restored or replaced like-for-like.

- c. The doorway currently gives a good sense of arrival, and removal of the steps will enhance that by returning it to its 1913 aspect (see photograph of that date in the supporting documents). The material, style and treatment of the new door will also need careful consideration, as will its relationship to the entrance opening.
- d. The proposed new roof is inappropriate, awkward, intrusive and damaging to important sight lines. The attempt to unify the proposed new building under the curved roof is misguided in the damage it causes to the 1913 building, which should be retained intact as intended, not treated as a piece of fossilised history under a modern roof. We do not accept that the statements in response to comments made during the consultation process alleviate these concerns in any significant way.

Despite the competition design for the college having had a taller roof than that which was built, all the buildings on Walton Street were required by covenant to be of a height below the meridian line set from the Radcliffe Observatory to Worcester College. This was important in calibrating the observatory instruments. It is thus likely that when Ruskin College was built, the college was required to lower the roof to prevent the meridian being blocked. The Heritage Impact Statement says that the meridian line is 'not documented'. This is false. The leases of the properties on the west side of Walton Street contain covenants to restrict the heights of buildings on the street, and this is also documented by Malcolm Graham ('On Foot in Oxford: 1. Gloucester Green and Jericho' – Oxfordshire County Council, 1988, page 7). In their recent planning application for the Blavatnik school of government, the university have shown images of the view southwards from the Observatory tower in order to demonstrate that the proposed building will not interfere with the meridian. We suggest that Exeter College should be asked to do the same for the proposed new roof.

3. The design and materials of the new building are unfortunate and inappropriate. The steel roofs and in particular the proposed new building at the rear of the site do not appear to have any rainwater goods. It seems that water will cascade unhindered down the roof to the pavement below, and as increased amounts of rainfall are currently a concern to residents and developers, this is a serious matter. How will rainwater be handled in such a way that passers-by will not be soaked as they walk along Worcester Place? We do not accept that the statements in response to comments made during the consultation process alleviate these concerns in any significant way, as the guttering is not shown on the drawings and if large enough to capture the rainfall will make the proposed new roofs very unsightly.

- 4. The proposals for on-street cycle parking should be rejected. While we support measures to improve cycling provision in Oxford, the provision of cycle racks in public places soon produces the phenomenon of the 'dead bike'. Other local bike parking arrangements show how racks get filled up with cycles that remain there unused for years becoming more and more dilapidated and taking up space from genuine users and being a continual public eyesore. The position at Oxford Railway Station is an even worse example. We suggest that either all cycle parking is behind the gate on site, or Exeter College is required to agree that any cycle left unused in the street rack for more then three months will be removed.
- 5. Transport policy: There is no way that a cyclist leaving the new building will follow the 'one-way' system to get to Walton Street. There should either be a contra-flow cycle lane in Worcester Place or a reorganisation of the traffic flows to allow for this. We do not accept that the statements in response to comments made during the consultation process alleviate these concerns in any significant way.

Yours sincerely

Liz Woolley Hon Secretary, Listed Buildings Sub-Committee