

26 October 2018

Planning Heritage Team  
Oxford City Council  
By email: [heritage@oxford.gov.uk](mailto:heritage@oxford.gov.uk)

## **RE: CPRE Oxfordshire response to the Central Oxford (City & University) Conservation Area Appraisal, October 2018**

Dear Sirs

I am pleased to attach CPRE Oxfordshire's comments on the draft Appraisal for the Oxford Central Conservation Area. This Conservation Area is of unquestionable international importance and warrants an appraisal of the highest quality fully in line with national and international standards. Oxford's central Conservation Area is of the greatest significance within the national and county context and because of the literally iconic skyline, is a major feature in the landscape. Oxford's Green Belt was designated in part to protect the setting of the historic city. Its significance in this respect impinges significantly on the responsibilities of neighbouring authorities as well as the City Council's.

Oxford and the surrounding area is under massive pressure of development and having a formal CA appraisal that is fully cognisant of all the key sensitive characteristics that make it and its setting special is of the highest importance.

In our comments below we have followed the online questions posed in the online consultation. Most are critical – we hope constructively so – but there is also much we have not commented on in the draft that is both sound and appropriate. While we think there is much of importance not covered, or only in the most sketchy terms, what is in the draft is certainly relevant and we have not identified anything that should not be there. In general we think the overall structure works. We do have a concern that much is stated in very bland generalised terms that tends to gloss over some of what is really distinctive; our much bigger concern is what is missing – especially in terms of what matters for the Conservation Area as a whole, not just the defined constituent character areas.

We note that within the structure of the questions there are inconsistencies that derive from gaps within the draft. Thus under question 2, *The quality of the natural environment and open space* –[sic – presumably the LOSS of such quality!] is listed as a threat to be considered, but the coverage of what the natural environment contributes to the CA is woefully inadequate (see below). Other similar mismatches also occur.

Our full response to the Consultation Questions is given in the Appendix below.

Yours sincerely

Peter Collins  
Chair

# Appendix Answers to Questions

## Q1.

*What do you value most about Oxford's Central Conservation Area?*

### **CHARACTERISTICS LISTED**

All the characteristics listed are of great importance: what is more, their cumulative importance is more than the sum of the parts because they are all interactive. It is not helpful to single out some as more important than others

### **OTHER:**

#### **A The SETTING of the Conservation Area as part of its Character and Appearance.**

##### *A1 Concept of setting*

This CA appraisal is typical of Oxford in treating selected views as a surrogate for how the surroundings of the CA contribute to its 'character and appearance' and 'setting.' This is an out-moded approach originating in the 1960s and, because of some success in Oxford over the decades (but very notably NOT in the notorious Castle Mill development overlooking Port Meadow) has been updated and revived but never replaced by a full consideration of ALL aspects of how the setting of heritage assets contribute to their significance and people's appreciation and understanding.

The report into the Castle Mill Flats (which may people consider something of a whitewash) made the recommendation that the City Council should revisit the whole issues of how its views policy relates to setting – but this has never been done. Meanwhile, Historic England have issued new advice which makes it clear (as in fact was always the case) that particular views of or from a heritage asset are only one aspect of the many factors that the concept of setting embraces.

The failure to engage properly with how far beyond the very limited notion of views the surroundings of the central Conservation Area contribute to its character appearance and setting means that it is far more limited and weaker than it should be.

What is required is a proper consideration of how the surroundings contribute to the significance of the CA using the HE guidance. This could relatively easily be represented as a matrix taking each key factor in turn and considering what its positive contributory factors are; what its detracting factors are; how it interacts positively or negatively with other factors; and how all the factors contribute to significance. This would then be a far better basis for developing guidance on key issues and potential sources of harm.

##### *A2 Weight in the panning balance*

Oxford City Council has for far too long treated the surroundings of the Central Area and how it is perceived within its surroundings as an issue of Views (NOT a statutory or NPPF 'Great Weight' issue) rather than as part of the Character or Appearance of the CA and the Setting of multiple very high grade listed buildings, which are STATUTORY considerations, and along with the setting of other heritage assets (Scheduled Monuments, Registered Parks and Gardens and the Conservation Area itself) are 'GREAT WEIGHT' issues under the NPPF.

This crucial difference between issues that are statutory and/or carry great weight in planning balance is of substantial importance in terms of the planning balance and the distinction between setting and mere views MUST be explicit throughout the CA Appraisal. This is all the more important where the asset is (as the City Council formally recognise) of not just the highest national importance but also appreciated across the world as internationally important. The Oxford skyline is literally of iconic importance used in hundreds of logos and straplines (including the City Council's) as an instantly recognisable feature.

## **B Visual attributes: views of, across and from**

The coverage of visual values of the CA as a whole is somewhat limited. An indication of this is the statement that *the Oxford View Cones study the ten protected view paths in Oxford, which are important heritage assets and fundamental to the city's distinctive character*, which is deeply misleading: firstly views (or 'view paths') are patently NOT heritage assets; nor are they fundamental to the city's distinctive character. The **subject** of such views – ie the famous skyline; the interplay of towers and spires domes and cupolas of different architectural periods and buildings reflecting religion, defence, academia etc. as a whole set within the topography of the well-vegetated valley and tree-lined hills – is what is fundamental to the CA's character and appearance. But that subject – even as a whole – can be appreciated in many different ways and the protected view cones are only one that has become vastly overrated when seen in the wider context of moving through the landscape and looking out from or across the City.

In terms of popularity the vastly more important views are those enjoyed from within the CA looking out across the skyline from which its features and interplay of relationships of individual buildings and their place within the townscape are FAR better appreciated and understood: the only aspect of view cones that is special is the DISTANT view of all the contributory towers and spires seen from different angles and how these views have some historical and iconographical context. In terms of popularity of imagery, the views from St Mary's of the Radcliffe Camera and All Souls are as at least as well used as the more distant ones (of which the only relatively close view, from South Park is by far the most commonly reproduced).

Key to all these views is the point that in different ways the character and appearance of the CA and its setting can be understood and appreciated in views OF, FROM and ACROSS the CA skyline and the qualities of these and the detractors from them need to be fully considered on their merits NOT just assuming that the protected views are the most important. It is also fundamental that the qualities and characteristics that that can or cannot be understood in these different aspects needs to be properly analysed.

A good example of this is the green 'backdrop' and roof scape issues. Over the last few decades there has been a very insidious and gradual loss of the green backdrop as buildings outside the restricted height zone have visually intruded up into into the band of wooded hillsides that forms the backdrop to views out, thus narrowing and reducing this band. This is very evident in relation to the new buildings along the canal and the Castle Mill Flats. Another example, is the heightened Debenhams roof as seen from the Sheldonian. In terms of roof scape the clutter of heat and air conditioning equipment, telephony, and formless roofs has detracted from views out, again at least in part because they have simply not been valued.

A further issue in this that is not recognised is the existence of tall buildings outside the CA that detract from its character and appearance. The relatively recent removal of the former biochemistry tower made a big difference to both the distant views looking in and those (in this case closer to the detractor looking out). The minaret of the new Islamic Centre in Marston Road is a positive contribution to the skyline looking out from or across the CA – and just as Nuffield spire has become accepted, so the Seacourt Tower is becoming seen as relatively neutral. But whether the Botley development will be has yet to be seen – but raises the additional point that the setting of the CA extends well outside the City Council's area and its conservation needs to be an important consideration for the Vale of White Horse and other neighbouring authorities.

This consideration of views of, from and across the CA relates to how the setting of heritage assets is understood and appreciated; a key factor in which is the principle that the importance of 'setting' is not reliant on public accessibility. Thus the visual values of the CA and significance of views should not be limited to publicly accessible viewpoints. Kinetic views and glimpses from places unrecognised as having any special value are important contributors to the whole, as is the experience to be gained by the many thousands of visitors and residents who experience it from roof top restaurants, offices or college and university buildings.

### **C Archaeological Heritage**

The central Conservation Area covers most of what is also recognised in the local plan as an area of archaeological importance of national significance (it was originally defined in the context of possible designation under the 1972 Act. While that policy provides mechanisms for managing the archaeological heritage, the Appraisal treats archaeology as background history, not a core part of the character of the CA; this is a false split because the above and below ground heritage is fundamentally integral in chronology, space and physical survival.

What is more, there are fundamental connections related to policy issues: the combination of CA designation and a strong policy for preservation in situ of archaeological deposits and structures in the same area means that there are multiple considerations and challenges in terms of scale and design of development to be fully compatible with both aspects of what is ultimately a single integrated whole. Put crudely, there are clear limitations on building both up[wards and downwards if the whole of Oxford's central heritage is to be conserved for the future.

As it stands this aspect of the CA's character is only acknowledged, not seen as fundamentally defining (eg in street pattern and survival of both ancient and more recent heritage assets). Nor are the implications considered in terms of consideration of factors needing to be considered in conserving the CA in a properly holistic manner.

It is also noticeable that while less significant as part of the defining characteristics of the built heritage, the prehistory of the central CA is also of national importance – and in the University Parks in particular, well preserved – and readily visible in dry summers. This is alluded to in only the briefest of mentions in the timeline.

### **D Street pattern**

Although the Saxon origins of Oxford's pattern of streets is alluded to, and the characteristics of different streets are described, there is a fundamental gap in not presenting a clear overview of how the street pattern as a whole reflects the history of Oxford's development and how those origins have been fundamental to how the character of the CA has developed: nowhere do we get an overview of the origins of pre-Saxon routeways and crossing points; planned Saxon burgh; the town defences; the origin and growth of medieval suburbs; the location and growth of market places; and later town planning (eg Beaumont Street St Johns street etc). Indeed it is not recognised that this development and the street patterns and resultant character that emerged has been massively influential not only in defining the different character areas, but also the limits of the CA (in effect covering the central area of urbanisation up to the early 19<sup>th</sup> century, with later development covered by other Conservation Areas.

The more detailed characterisation of character zones and streets includes some of this time-depth (especially for Character Zone 1) – but in a rather incomplete way, so the idea of the street pattern of the whole CA reflecting its historic significance and development nowhere comes together.

### **E Walls and other boundaries**

The historic, architectural, townscape, geological and ecological interest of the walls of the CA are not identified as a distinctive and highly significant characteristic of the CA, except (partially) in relation to the town walls – though even in that case, far more to their defining topographical/ historical areas than for their own sake. While the town walls are scheduled and Grade I listed, there are numerous other listed walls (notably the Grade II\* medieval wall of Magdalen Grove) and numerous others are listed by virtue of being part of the curtilage of other listed buildings.

This much loved and very familiar feature of Oxford is distinctive because it derives not just from Oxford having been a medieval walled town (and Civil War headquarters) but even more from the very numerous institutions (most obviously but far from exclusively colleges) whose often extensive grounds are defined by walls. In many cases such walls define historic entities now replaced or plots subsequently divided. The styles, geology and ecology of Oxford's walls are very varied and reflect the status and character of the spaces they define or once defined. There have been a variety of studies done on Oxford's walls and their ecology.

Much the same applies to railings – which should be covered as boundary form rather than 'street furniture' – though notably without the same ubiquity or richness of character – indeed it is walls rather than railings that broadly characterise the bounding of space in the central CA.

### **F Street Furniture**

Coverage of street furniture is very thin: nowhere is the range of features to be considered defined; references are to lamps (but seldom defining their age or character) occasionally benches and railings (see above) but with no relation to local history. Notably absent is any reference to lightwell gratings and covers to coal cellars. The latter exhibit a rich variety of types and designs many from local foundries such as Lucys Ironworks (now defunct as a factory). Mention should also be made of Oxford's distinctive street name plates.

### **G Designations of Green spaces and Wildlife**

Although the numerous Registered Parks and Gardens in the CA are mapped, nowhere is there any discussion of their importance or significance in terms of added conservation considerations: while Conservation Area status implies controls over the management of trees, the RPG designations add an additional layer of formal descriptive designation and even more added weight for decision-makers – including especially where Grade I RPGs are involved. As an example this was a significant issue and consideration in the Manor Place student accommodation appeal

Much the same applies to ecology and wildlife where local and national designations are mapped (eg including Magdalen Grove SSSI which is also Grade I RPG) there is no discussion of interaction of wildlife and heritage, or even veteran trees (despite there being published guides to Oxford's special trees). The contribution that wildlife makes to the character of the CA is largely restricted to so-called wildlife corridors rather than being holistic in how wildlife enriches the character of places and buildings – there is no reference to the draft *Biodiversity Action Plan for Oxford City Council 2015 – 2020* or other key considerations. Amongst these is the character of Oxford's walls, not only in their own right as architectural and townscape features but also a key habitat for numerous plant species and lichens which contribute greatly their character.

## **H Pollution and Lack of It**

Oxford's central CA is characterised by radically different experiences of tranquillity, clean air and light pollution – the appraisal rightly refers to oases of peacefulness etc but nowhere is there an overall picture of either the problem of noise, air and light pollution or, conversely, the upsides of the many places – especially the green spaces where such pollution is much less.

It is to us extraordinary that the coverage of these issues is so thin (only briefly mentioned in reference to character zones 1 and 2). There is no mention of the need for (or even the concept of) a lighting strategy such as exists for Bath – even though, almost immediate adjacent to the central CA, South Park is a Dark Skies Discovery Site. Likewise, Oxford's problem with air quality is notorious and is especially bad within the CA – though not so much so in many of the spaces within it. Much the same applies to noise – an issue that for a seat of learning in particular would seem relevant, where traffic noise is just a nuisance, whereas the regular chiming of bells is a very familiar and characteristic feature of the Area.

## **I Current Landuse and Density**

There is remarkably little on current landuse of property within the CA: although this can be inferred from some of the characterisation zones and their descriptions there is almost no critical comment on the implications of such usage relative to threats or opportunities. There is no mapping of recent development and change within the CA or its setting; no figures of domestic use or housing density; no discussion of issues to do with the centre of gravity of retail in the City or how this may be changing with the new Westgate and implications for whether (for example) there is more scope for changes from office or retail use to domestic. There is no material on which the potential for a 'living over the shop' scheme might help rejuvenate the city centre as happened for example in Cork. These are matters that relate closely to perceived threats and opportunities, but for which baseline data is lacking.

## **Q2.**

*What are the threats to the character and appearance of the conservation area?*

### **CHARACTERISTICS LISTED**

All the threats listed are of great relevance: what is more, their cumulative importance is more than the sum of the parts because they are all interactive. It is not helpful to single out some as more important than others.

### **OTHER**

The problem of air, noise and light pollution is an ongoing threat to the character and quality of the CA and the experience that people have of it. This is not adequately identified or dealt with yet it is well recognised as an issue and for all three, proactive action is not only desirable, but very possible and in some cases (eg electrification of buses) has begun.

We believe that one of the greatest threats is internal: an institutionalised lack of proper understanding about the difference between setting and protected views, as explained above, coupled with a take-it-for-granted complacency about many common but distinctive features whose gradual loss diminished. The lack of proper appreciation of the concept of setting and its different status from mere views is a threat because it diminishes the weight that must be given to these issues.

The over-exaggerated emphasis on view cones is an insidious threat because it seriously undermines both the far greater and more intimate experience of Oxford's skyline that is obtained for within the City centre and the many other ways in which the character and appearance of the CA relies on its surroundings. Likewise, having only just woken up to the fact that the vast majority of tourist visitors to Oxford experience the famous skyline and interplay of architecture from one of 6 heritage viewing places, the City Council is now in danger of disregarding the growing number of other places (roof top cafes and restaurants) that also provide such opportunities, and for many others residents and visitors the experiences to be gained from within other buildings to which access is given to residents and academic business and other visitors.

The absence so far of any attempt to map broad sensitivities to change is also not encouraging.

### Q3.

*Please let us know if there any particular buildings, areas or places that are under threat and require attention?*

**The setting of the CA** – see above.

### Q4.

*What aspects of Oxford's Central Conservation Area would benefit the most from enhancement?*

#### **CHARACTERISTICS LISTED**

All the aspects listed would benefit

#### **OTHER**

Reduction of air noise and light pollution (see above Q2) – together with the other aspects covered in Q2.

### Q5.

*Please tell us about areas, buildings, or features within the conservation area that you think are important to the character and significance of the area that may not be well known. Why are they of special value and importance?*

**See above answer to Q2**

As a specific example the huge improvement made by Lincoln College to the S end of Turl Street in reconfiguring the wall and Rector's House together with sensitive insertion of ultra modern Award-winning Berrow Building and creation of a new view through the gate to the Radcliffe Camera St Mary's etc. (Detailed citation for OPT award can be made available).

More such positive case studies should be included.

### Q6.

*If there is to be change within the conservation area, where do you see opportunity for this? This could be the creation of new public space or replacement buildings for example*

This is a strange question because change is already constant.

The removal of detractors from within or outside the CA – eg removal of the Engineering Building would be a significant benefit just as removal of the Biochemistry Tower was a few years ago; likewise Newsquest. We appreciate that this can only happen when opportunity arises, but the point should be to ensure much more stringent control on design quality and location of buildings that are potentially intrusive.

### Q7.

*To what extent did you find the [Draft Appraisal](#) useful in helping you understand the significance of the Conservation Area?*

**To a little or moderate extent** – It is much stronger on some aspects than others, but we consider the gaps and problems referred to above are serious omissions.

### Q8.

*Does the [Draft Appraisal](#) sufficiently identify and discuss the history, character and values of the conservation area and in a way that makes it easy to understand, protect and enhance the area?*

**NO** – see above for suggestions of matters that require a lot of attention. More should be covered on the history of how and why detracting elements have not been resisted.

### Q9.

*Please let us know if you think anything is missing from the [Draft Appraisal](#) or if there are any other improvements you would like to see.*

**See Above** – *passim*

### Q10.

*Would you like to tell us anything about the character, existing features of interest or potential for enhancement of any of the streets in the conservation area? Please tell us the street name and any information, ideas or suggestions.*

**See Above** – *passim*

### Q11.

*Are there any other comments you like to make?*

This appraisal is very long overdue and therefore very welcome. BUT there are also serious omissions and problems some of which indicate that concepts of heritage value especially around views and setting are still badly out of date and not fit for purpose.