Oxford Local Plan 2045

Submission Draft

COMMENT FORM

Part A

You only need to fill Part A in once

Your name: John Rhodes

Organisation (if applicable): Quod

Address:

Email:

Date: 11/3/26

Data protection:

Please note that your response will be made available for inspection by the public in paper form at the Council's offices, or other locations as appropriate for the purpose of facilitating public access.

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We cannot accept anonymous comments.

☒ If you are happy for us to state your name and the first line of your address and postcode when publishing your response(s), please tick this box.

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	Yes	No
Do you wish to speak at the examination hearings? (Please note that the Inspector will decide who to invite to speak)	◉	○
Do you wish to be notified when:		
the Council submit the Oxford Local Plan 2045 to the Government?	◉	○
the Inspector's Report is published?	◉	○
the Oxford Local Plan 2045 is adopted by the Council?	◉	○

GENERAL ADVICE

For advice on making a comment, please see the accompanying notes page. It is also available at www.oxford.gov.uk/oxford-local-plan-2045

When completing the form,

- You only need to complete Part A once
- Use Part B to make your specific comments. You may complete Part B multiple times to comment on different parts of the Oxford Local Plan 2045.
- Cover concisely all the information and evidence you feel supports or justifies your view, as this will normally be your only opportunity to tell us about it.
- Be as precise as possible.

HOW TO SUBMIT YOUR COMMENTS

Please submit completed forms by email or post to:

planningpolicy@oxford.gov.uk

Planning Policy Team
Oxford City Council
Town Hall
St Aldate's
Oxford
OX1 1BX

If you have any questions please feel free to get in touch with the Planning Policy Team
T: 01865 252847
planningpolicy@oxford.gov.uk
www.oxford.gov.uk/localplan2040

Please ensure your comments reach us by **4.00pm on Friday 13th March 2026.**
Thank you for participating.

DETAILS OF YOUR COMMENT

Part B

Please use a new Part B for each point you are commenting on. Attach all completed forms to Part A.

Please read the accompanying notes before completing Part B. The notes explain what we mean by soundness and legal compliance. These are questions that we are expected to ask consultees.

Q1. Which part of the document do you wish to comment on? (please give the relevant paragraph or policy number)

Paragraph		Policies Map	
Policy Number	SPE:14	Sustainability Appraisal	

Q2. Do you consider that the document:

(a) is legally compliant?	☐ Yes	☉ No
(b) is sound?	☐ Yes	☉ No
	☐	☐

Q3. Do you consider that the document is **unsound** because it is <u>not</u>: (tick as appropriate)

(a) positively prepared?	✔	(c) effective?	✔
(b) justified?	✔	(d) consistent with national policy?	✔

Q4. Please tell us below why you consider the document to be unsound or not legally compliant. If you do believe the document is sound or legally compliant, or complies you may use the box to explain why.

Please see our attached representations

Please use an extra sheet if completing a paper copy.

Q5. What change(s) do you consider necessary to make the document sound or legally compliant? Please explain why this change will achieve soundness or legal compliance. It would be helpful if you could suggest revised wording for the policy or text in question.

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This is the end of the comment form

Introduction

1. These representations are submitted on behalf of the University of West London, owners of the land at Ruskin Field which is subject to draft policy SPE14.
2. The University supports the allocation of the land for residential development. However, the drafting of the policy wording is not considered to be positively prepared.

Representations

3. Since its acquisition of Ruskin College in 2022, the University has undertaken a review of its accommodation requirements and concluded that its requirements can be met from the development of the land allocated as SPE:13 and the site immediately to the north previously allocated as site SP56 in the local plan 2036. Separate representations have been submitted in relation to that land. As such, the land at Ruskin Field is surplus to the requirements of the University.
4. Conscious of the extreme need for housing in the city, the University undertook an exercise to attract a high-quality development partner for the development of Ruskin Field. The suitability of the site and the strength of demand in the city meant that there was substantial competition for the land and the University was pleased to select Welbeck Land as its preferred development partner. Welbeck have entered into pre-application discussions with the City Council with a view to bringing forward a planning application.
5. Whilst the University was pleased to see that the Local Plan proposes the allocation of Ruskin Field for residential development, the style, phrasing and nature of policy SPE14 is considered to be inappropriate.
6. The University has noted a characteristic of policies in the 2045 plan that they are heavily constraints based. The policies also substantially repeat other policies of the plan, are overly detailed and set out a number of matters which would be more appropriate to pre-application discussions and management through the planning decision-making process. Examples in relation to SPE14 include the overstatement of the contribution of the site to the character of the Old Headington Conservation Area and the assertion that development could have an impact from the Elsfield View Cone, notwithstanding that the View Cone does not include the site.
7. In practice, the site's previous contribution as a transition to open countryside has been substantially changed by the construction of the bypass and by the substantial and growing development at Barton. The policy should more positively recognise the site as a significant and unique opportunity to meet much needed housing requirements at a highly sustainable location within the city.

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Introduction

These representations are submitted on behalf of the University of West London, owners of Ruskin College in Headington and the adjoining Ruskin Field. They relate specifically to the land immediate north of and within the curtilage of the existing College Campus and which is allocated as a site for development in the Oxford Local Plan 2036 as Site SP56.

For reasons which are not understood (and have not been explained in the evidence base) the site is not shown as allocated for development in the Regulation 19 Local Plan.

The images below show the allocation of SP56 in the current local plan and the lack of allocation in the new Regulation 19 draft plan.

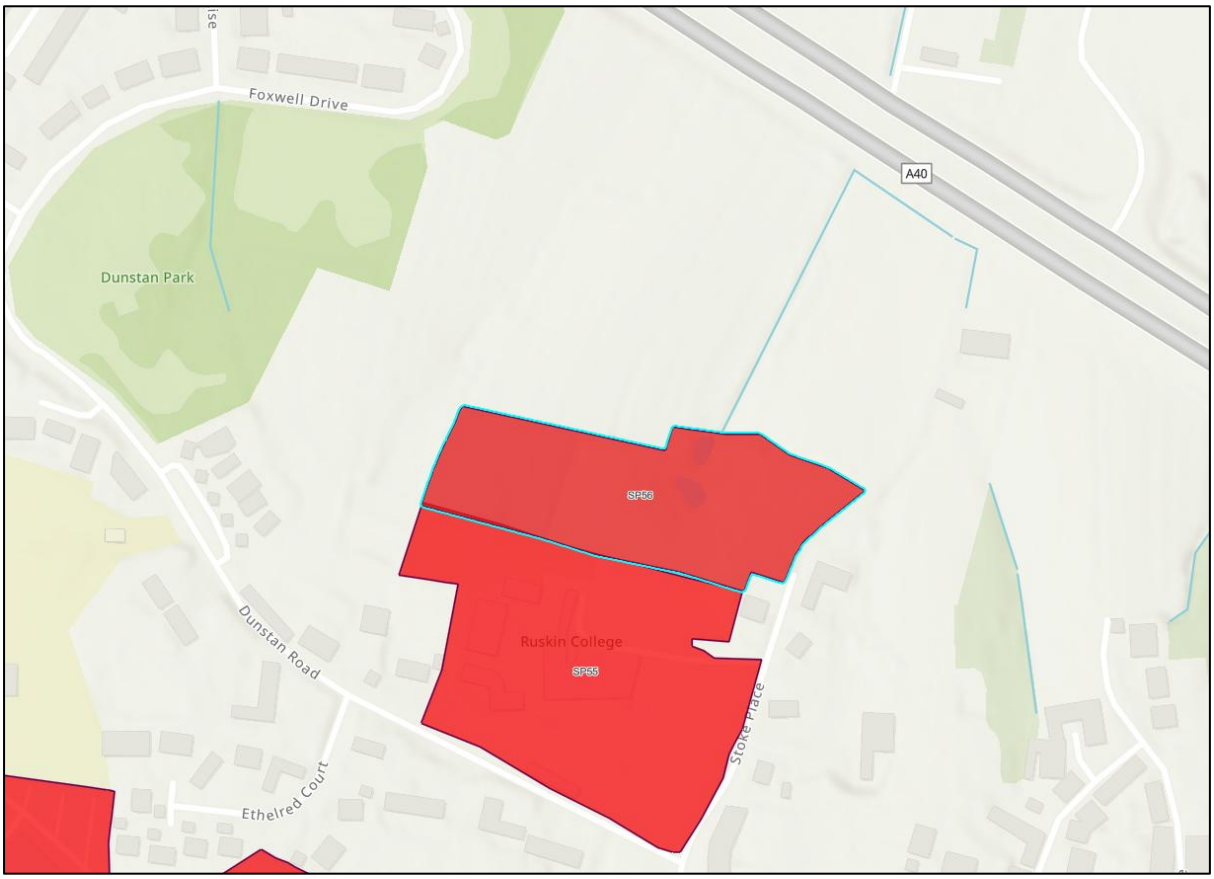


Figure 1: Extract from adopted Oxford Local Plan 2036 Policies Map (2020)

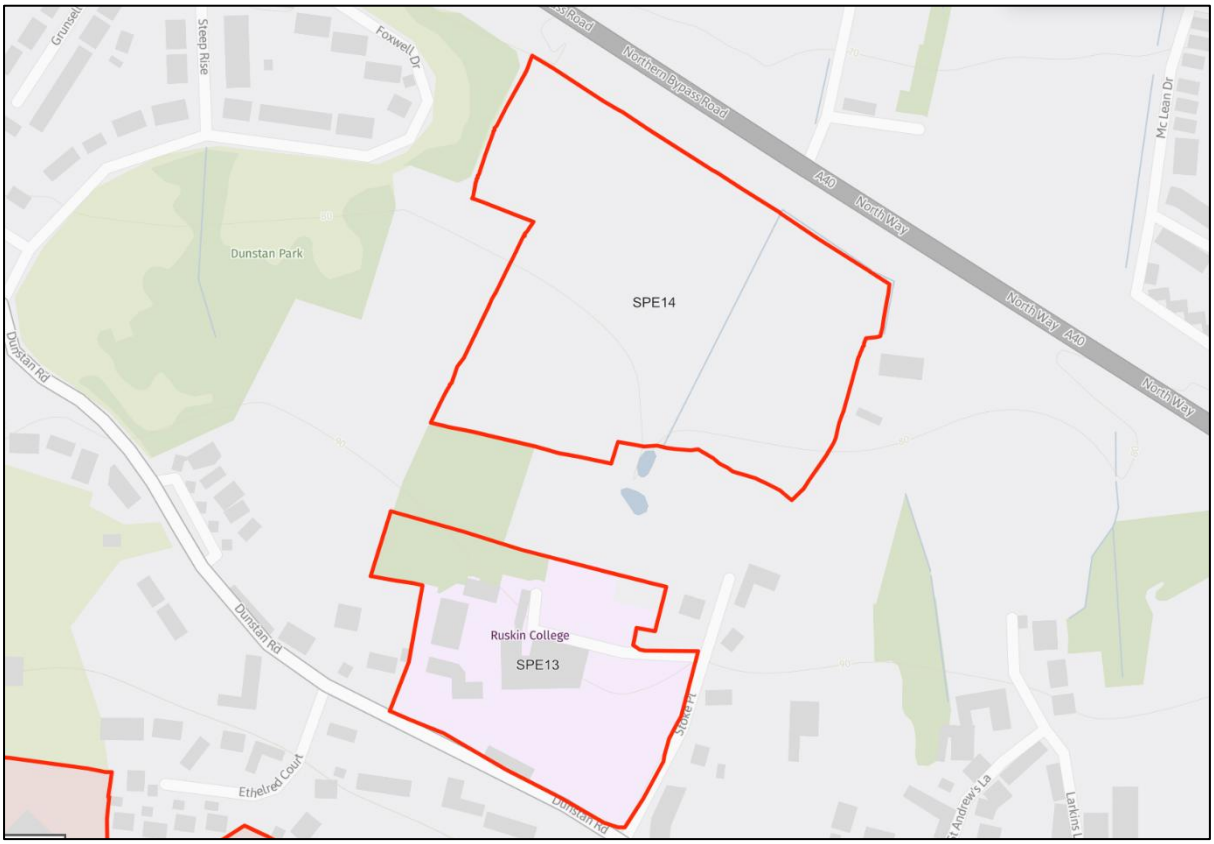


Figure 2: Extract from draft Oxford Local Plan 2045 (Reg 19) Policies Map

The lack of allocation is objected to and these representations explain that the plan cannot be found "sound" unless this matter is rectified because:

- It is apparent that the local plan has **not been positively prepared**. The plan acknowledges that it does not meet its objectively assessed needs, which is a minimum requirement of the NPPF. The failure to meet Oxford's needs puts pressure on the Green Belt and adjacent local authorities and it should be apparent that the plan has done all it can to realise its own capacity. De-allocating a development site suitable for housing and student accommodation without any assessment or explanation is not consistent with that obligation;

- The unexplained de-allocation of the land is **not justified** and not an appropriate strategy when considered against the alternatives. Optimising capacity in Oxford is unanswerably the necessary strategy;

- The plan **cannot be effective** if it is demonstrably not utilising the capacity within the urban area; and

- De-allocating sites suitable for development in an area of extreme housing need is **not consistent with national policy**.

SP56

The land immediately north of the Ruskin college campus buildings extends to 1.19 ha and has development potential for c. 50 dwellings or considerably more student units. Policy SP56 of the adopted local plan provides:

"Planning permission will be granted for expansion of the adjoining academic institution and/or residential development use only, which may include employer linked affordable housing. Other complementary uses will be considered on their merits.

New development should be informed by the landscape character and potential impact on views from the north in terms of choice of siting, height, form and appearance."

When assessed by the City Council, the land has been consistently found to be suitable for development. The following summaries are drawn from the Council's own Site Assessments.

- **2036**: In the work undertaken to inform the allocation of the land in the adopted 2036 local plan, SP56 scored well with no significantly negative score in the Sustainability Appraisal.[1]

- **2040**: the Assessment undertaken by the City Council for the (now abandoned) 2040 assessed the site SP56. The boundary assessed is consistent with the boundary of the SP56 allocation. The assessment concluded that there were no significant constraints, although sensitive design would be necessary. The site was recognised as the SP56 site extending to 1.19 hectares and the Council's assessment stated that the site is allocated for a minimum of 20 dwellings.[2]

- **2042**: an assessment was then undertaken for an interim Regulation 18 stage in the local plan. This time, however, it covered not only SP56 but also the land known as Ruskin Field to the north, up to the bypass. The area assessed was 4.69 hectares, including but not limited to the SP56 land. The assessment reported "no significant heritage concerns" or other concerns and recommended that the site should be considered further for allocation, i.e., the whole of Ruskin Field and the site of SP56.[3]

- **2045**: the most recent assessment was undertaken for the new 2045 local plan. It considered a different area again. This time the assessment was limited to Ruskin Field to the north – an area which has now been allocated in the Regulation 19 plan as SPE14. It only assessed Ruskin Field, north of

[1] Table 7.2 (page 78) of the Sustainability Appraisal and Strategic Environmental Assessment (September, 2018)
[2] OLP2040 Site assessment proforma (including Sustainability Appraisal)
[3] Oxford Local Plan 2042 – Interim Regulation 18 stage site assessment form incorporating sustainability appraisal (https://www.oxford.gov.uk/downloads/file/3748/463-ruskin-field)

SP56, and the site area assessed was given as 3.51 hectares. The assessment **did not assess the allocated site SP56**.[4]

When the University first saw the assessment it assumed that SP56 was excluded from the assessment because its allocation would be caried over into the new Local Plan from the adopted plan. The Regulation 18 local plan of May 2025 recognised the SP56 allocation and suggested the potential for Ruskin Field to the north to also be developed.[5]

It had not anticipated that SP56 would be de-allocated – at all, let alone without any assessment or evidence base justification. Neither did the City Council approach the University as landowner to explain the proposed de-allocation of its land.

For the avoidance of doubt, the University objects to the removal of the SP56 allocation. The University's position is recorded below.

Site SP56

Prior to the University acquiring Ruskin College in 2022, the previous owners of the College agreed with the City Council a masterplan for this site that was discussed and adopted/approved by the then Planning Committee. Whilst the Plan was light on detail, the land was clearly designated for expansion of the College should the need arise in the future.

During a recent review of the College estate by the University, site SP56 was recognised as an important asset to future proof the College. Whilst there is no specific requirement for the site at this time, student numbers have grown since the University acquired Ruskin College and it has become a centre for conferences and events. The future of the College is on an upward trajectory.

The future of site SP56 featured heavily in the decision to declare Ruskin Field surplus to requirements. Ruskin Field has now been included in the Reg 19 new City Council Local Plan for development and an application for new housing is being prepared by development partners through discussion with the City Council planning officers. The possible disposal of Ruskin Field is an important generator of capital for reinvestment in the College to make it more attractive to potential students and conference organisers.

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[4] Site capacity assessment – Local Plan 2045 (https://www.oxford.gov.uk/downloads/file/3992/spe14-ruskin-field--site-capacity-assessment)

[5] The Regulation 18 plan stated: *There is a site allocation for housing on part of Ruskin Field. The larger area of the field to the north has been put forward for development by the landowner. The northern part of the field has potentially better access than the allocated site. However, it is potentially more sensitive in terms of the heritage setting of the Old Headington Conservation Area. There is also potential for peat reserves on the site. Further investigation of the site is needed.* For reasons explained below, access is available to SP56. However, to suggest that the land to the north is more sensitive but then to allocate it in the Regulation 19 plan but delete the SP56 allocation makes no sense.

If the Ruskin Field housing application is approved in due course, rights have been reserved in an agreement to use a new access to the College estate from Foxwell Drive, Northway to serve the rear of the College and in particular site SP56 as a further step to safeguard the future of the College. Access to develop site SP56 from the existing campus is not feasible given the historic road network through Old Headington.

Without the option to expand onto site SP56 in the future with access from Foxwell Drive the sustainability of the College as a viable institution will be in question as the campus has little scope to accommodate new academic or student housing buildings.

Student Housing

The campus has three existing outdated student housing blocks (Beko, Beatrice Webb and Bowen) and consent has granted in 2023 to demolish the existing Bowen block and replace it with a 65 bed new student accommodation building with consent also granted for a new 30 bed student accommodation block adjacent to the Library building.

Ground works to instal power and drainage infrastructure to serve the new block of student accommodation have been completed. but funding approval is awaited to complete the student housing development. The development of Ruskin Field would provide that funding.

Conclusion

There has been no material change in the suitability of the SP56 land for a sensitively designed development of homes or student accommodation since the adoption of the current Local Plan in 2020.

The City Council's own evidence base has twice since confirmed the suitability of the SP56 land for development.

Its allocation should be reinstated in the interests of a sound plan.