

**OXFORD CITY COUNCIL LOCAL PLAN EXAMINATION – MATTER 2 – ISSUE 1 AND 2
RESPONSE ON BEHALF OF RUSKIN COLLEGE AND WELBECK LAND
(RESPONDENT REF: 120)**

Introduction

Ruskin College and Welbeck Land (the Promoters) welcome the opportunity to respond to the Stage 1 Oxford City Council (OCC) Local Plan Matters, Issues and Questions identified by the Inspectors. Further stages of the Examination are anticipated and we reserve the opportunity to provide further comment at the appropriate stage.

These Matter Statements have been prepared on the basis that the Local Plan is being Examined under the requirements of the National Planning Policy Framework (2024).

Representations were submitted on behalf of the Promoters in response to the OCC Local Plan Regulation 18 and Regulation 19 Consultations in respect of their proposal for residential development at ‘Ruskin Field’, Headington, Oxford (the Site).

The Site, including the access land extends to 3.66Ha (Appendix 1). It is identified for allocation at ‘Policy SPE14: Ruskin Field’. The proposed allocation site is entirely owned by Ruskin College (University of West London). Ruskin College has partnered with Welbeck Land to promote the Site and prepare an outline planning application. The Site is promoted for residential development with associated public open space, landscaping, infrastructure and access from Foxwell Drive.

Whilst support is given to the allocation made at Policy SPE14, it is our position that the policy significantly underestimates the capacity of the Site. The policy wording states *“The minimum number of dwellings to be delivered is 28 (or, if delivered as self-contained student rooms, the equivalent number of rooms when the relevant ratio is applied...”*.

The Site has been subject to significant surveys and evidence gathering in support of the allocation and pre-application scheme development. Through this process the Site’s capacity has been tested and demonstrated that the Site can suitably accommodate a minimum of 90 dwellings, which can assist the Council to meet its local housing need within the extent of the City in a unique and highly sustainable location.

The technical evidence base for the Site has shared and discussed in with consultation with OCC officers as part of a planning performance agreement. This evidence base demonstrated that there are no known overriding constraints to the development.

It is therefore confirmed that Ruskin Fields is suitable, available, deliverable, and has the capacity to provide a minimum of 90 homes in the first five-years of the new local plan period.

MATTER 2 – ISSUE 1 – LOCAL HOUSING NEED

Issue 1 – Local Housing Need

3. To determine the minimum number of homes needed, paragraph 62 of the Framework states that strategic policies should be informed by a local housing need assessment, conducted using the standard method in the Planning Practice Guidance ('PPG'). The PPG advises that the standard method provides local planning authorities with a minimum annual housing need figure which can be applied to the whole plan period.

Q1 Using the standard method, what is the minimum number of new homes needed over the plan period? Is this adequately set out in the Plan?

Page 2 of the Regulation 19 Local Plan states:

*"The minimum housing need figure for Oxford has been calculated by using the Government's Standard Method as set out in National Planning Policy and guidance. The housing need in Oxford is for **1,087 new dwellings per annum**. However, this need is greater than the capacity of the city to deliver it. The assessment of capacity (set out in the Strategic Housing Land Availability Assessment 2026) is 9,267 homes over the plan period, or 463 dwellings per annum.*

The local housing need is not mentioned elsewhere in the Local Plan.

It is noted that OCC has since published document CSD009 'Updated Housing Requirement'. This states that the local housing need has been updated to **1,078 dwelling per annum (dpa)**, 9 fewer dpa than the Regulation 19 Local Plan. This position reflects the up to date local housing need a result of recalculating the Standard Methodology using latest available statistical data as published in May 2026.

Therefore across the proposed 20 year plan period 2025 to 2045, there is a local housing requirement of **21,560 dwellings** (1,078 dpa x 20 years). It is reiterated that this reflects the minimum requirement and does not reflect the any wider Government aspirations for growth as part of the Oxford to Cambridge corridor.

Within CSD009 'Updated Housing Requirement' document OCC identifies there is an unmet need of 12,519 dwellings¹.

It is stated that *"The surrounding Oxfordshire districts have formally agreed to meet this need, with the following distribution:*

- Cherwell 4,400
- South Oxfordshire 4,950
- Vale of White Horse 1,830

¹ (unmet need 12,519 dwellings + proposed housing requirement 9,042 dwellings = 21,560 dwellings local housing need)

- *West Oxfordshire 2,028*

Total 13,208”

It is noted that there is a signed Memorandum of Understanding (MOU) (Examination Document Ref: COM.003) on co-operating to meet Oxford’s unmet housing need between Cherwell District Council, Oxford City Council, South Oxfordshire District Council, Vale of White Horse District Council and West Oxfordshire District Council as dated 2nd July 2026.

The MOU sets out the existing approach to planning to meet Oxford’s unmet need. It is demonstrated that there has been very limited housing delivery at planned sites within adopted plans. It is stated that just 237 homes have been delivered to specifically meet Oxford’s unmet housing need within West Oxfordshire District. It is also stated that with none of the affordable homes delivered have been made available to those on Oxford’s housing register.

Whilst the proposed housing provision by neighboring authorities to meet the Oxford’s shortfall is still being tested or yet to be tested as part of Local Plan Examinations, questions remain regarding the effectiveness of the strategy to deliver the unmet housing need.

Issue 2 – The Housing Requirement – Policy H1

4. Policy H1 sets out a total housing requirement over the plan period of 9,267 new homes (or 463 new homes per year). The supporting text states that this figure is derived from the Strategic Housing Land Availability Assessment (‘SHLAA’). This is because the need for housing in Oxford is greater than the capacity of the city to deliver it.

Whilst support is given to the proposed allocations, particularly SPE14 Ruskin Field, concern is raised about how the Council has reached conclusions regarding the capacity of sites, anticipated delivery of such sites and therefore whether the proposed housing requirement, which is prepared to reflect the Oxford Strategic Housing Land Availability Assessment (SHLAA) (January 2026) capacity, is justified.

Q1 How did the Council identify sites to assess in the SHLAA? Has a sufficient range of sites been considered for housing?

The Site was first submitted to Oxford City Council as part of the current plan making process in response to the Call for Sites in March 2025.

Q2 What is the minimum site size and/or threshold that the Council used? Is there potential for additional housing to come forward on smaller sites?

The SHLAA identifies that it has established a threshold to assess sites capable of delivering a net gain of 10+ dwellings (or approximately 0.25Ha). The SHLAA identifies that there is some potential for housing to come forward as windfall.

In order to rely upon windfall delivery within the housing trajectory, the NPPF states at paragraph 75 that:

“Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends. Plans should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area.”

The SHLAA provides commentary on windfall at paragraphs 2.6.13 to 2.6.28 from small sites (0-9 dwellings) and sites of 10+ dwellings. Based upon historic windfall delivery rates, OCC identifies that provision could be made for 112 dpa from small sites and 57 dpa from sites of 10+ dwellings.

However, the SHLAA notes that:

2.6.26 Both of the windfall assumptions are regularly updated, to reflect annual completions data updates. The allowance for major windfall sites in particular will need to be reviewed through the plan period (and capacity calculations adjusted accordingly) because the SHLAA (2026) assessment includes many more sites than ever before, thus potentially reducing the likelihood of there being unidentified majors windfalls to the same extent in future years, although housing delivery is expected to remain complex and unpredictable in Oxford, and the factors that make it so will remain, such as significant demand for many uses and significant public sector ownership.

As such there appears to be less certainty regarding windfall delivery at sites of 10+ dwellings, this raises further questions as to the robustness of the proposed supply derived requirement.

Q3 In determining capacity, how did the Council take into account other land use designations and planning policies, including the Green Belt, green infrastructure and land designated for employment purposes?

Table 1 of the SHLAA identifies the types of land and designations which were included in the SHLAA site search and those excluded.

Paragraph 2.3.13 states

“Reflecting the significant need for housing in Oxford, the general approach in the SHLAA search for sites is to cast the net as widely as possible and explore all reasonable opportunities to identify capacity for housing in Oxford. So sites with the following types of constraints are all still included: greenfield sites, Green Belt/Grey Belt, open air sports facilities, green infrastructure corridors, locally designated wildlife sites (Local Wildlife Sites and Oxford City Wildlife Sites). For such sites, the constraints are identified (see Table A, Policy considerations and Physical/Environmental considerations columns), including where they would restrict development, but they are not ruled out outright they are still assessed to weigh up the balance.”

Support is given to the Council’s approach to consider the potential of sites, without simply discounting suggestions on the basis of existing designations, for example a site located within the Green Belt.

Q4 How has the Council sought to maximise densities and prioritise the efficient use of land?

Whilst support is given to the proposed allocations, particularly SPE14 Ruskin Field, concern is raised about how the Council has reached conclusions regarding the capacity of sites, anticipated delivery of such sites and therefore whether the proposed housing requirement is justified.

The Oxford Strategic Housing Land Availability Assessment (January 2026) explains *“for sites which do not have a site allocation or a planning permission, then a density typology was applied to estimate capacity”* (para 2.4.16). It is summarised at Table 3 that a range of densities were proposed from 100 dwellings per hectare (dph) in city centre and district centre locations, 80 dph at gateway sites, and 60 dph in suburban sites. It is stated that *“In conservation areas that are former rural settlements characterised by low-density development, an appropriate lower density has been assumed.”* (para 2.4.17)

The SHLAA states in respect of assessment of a site’s development potential that

“2.4.12 For those sites in Table B which have a site allocation in LP2045, bespoke site specific analysis has been undertaken as part of the evidence for the site allocation. This therefore provides the most accurate and up to date information to inform the capacity assumptions in the SHLAA”.

The Council has published its Site Capacity Assessments as part of the Examination Library. Using Ruskin Field as an example, CAP.020 – SPE14, the Site Capacity Assessment for Ruskin Field², the document identifies a number of key considerations informing the minimum number of homes for the allocation policy but does not itself identify a site capacity. The SHLAA identifies the anticipated capacity of Ruskin Field (SHLAA Ref: 463 and draft Allocation SPE14) of just 28 dwellings to be delivered during years 11-15 (2035/36 - 2039/40) of the plan period. Strong objection is raised to this assessment.

The Site Capacity Assessment for Ruskin Field (CAP.020 – SPE14) acknowledges that ‘a *“cautious approach”* has been taken to calculating a minimum capacity, it states that:

“Minimum capacity for the site has been calculated with the following assumptions:

- *Further testing may show that greater capacity is possible, but because of the very sensitive nature of the site in terms of heritage, setting and green infrastructure/ecology, a cautious approach has been taken to calculating a minimum capacity.*
- *A density of 25dph is assumed, fitting of the greenfield location in a largely intact rural village type conservation area*
- *n-s hedgerows and boundaries to be maintained.*
- *The northern area of the field to be developed, with the southernmost parts closer to the pond area and priority habitat to be retained green, with opportunities for enhancement of these, potentially as public open space that is a nature area.”*

The Site Capacity Assessment and the SHLAA appear not to reflect that the Site has been the subject of technical evidence base and consultation with OCC officers as part of a planning performance agreement which has demonstrated that there are no known overriding constraints to the development.

² <https://www.oxford.gov.uk/downloads/file/4453/cap020---spe14-ruskin-field-site-capacity-assessment>

Making efficient use of the land proposed for allocation, whilst respecting its context allows for a capacity to deliver a minimum of 90 dwellings, of which 40% would be affordable dwellings. This proposal would make a much more meaningful contribution towards both market and affordable housing supply within the City than suggested in the draft policy wording (i.e. a minimum of just 28 dwellings).

The Promoter is actively engaging in pre-application discussions and anticipates submitting a planning application during 2026. As such, the Site can make a significant positive contribution towards housing delivery in the first five years of the plan period on land outside of the Green Belt and in close proximity to key employment locations.

In light of these site specific concerns, it is questioned how robust the assessment of the available sites has been in the SHLAA and whether there is potential for OCC to meet more of its identified Local Housing Need within its administrative boundary.

Q5 Are there any suitable, available and developable sites which the Council has not considered as part of the plan-making process? Could other sites (notably existing employment sites) be reused for housing?

No comment.

Q6 Based on the available evidence, how many new homes are expected to come forward in Oxford over the plan period?

It is noted that OCC has since published document CSD009 'Updated Housing Requirement' which sets out a reduced position in terms of local housing need and the housing requirement at Policy H1.

It is now proposed that the housing requirement is for at least 9,041 new homes over the plan period 2025-2045 (average of 452 per annum). This change proposes a reduced requirement, a reduction of 226 dwellings over the plan period.

Objection is raised to this approach. OCC has not taken the opportunity to increase the anticipated site capacity of Ruskin Field– SPE14, despite acknowledging that 'a cautious approach' has been taken in the Council's assessment and the technical documentation shared as part of pre-application discussions. It has been demonstrated that the Site has the capacity to deliver a minimum of 90 dwellings, of which 40% would be affordable dwellings.

The housing requirement should be updated to reflect accurate site specific capacity assessments. This has the potential to be increased by 62 dwellings to reflect the capacity at Ruskin Field (SPE 14).

Q7 What is the housing requirement for the plan period, is this figure justified and is it clearly set out in the Plan?

Background paper 001 'Housing Need, Requirement and mix'³ explains that Oxford's local housing need can not be met, it is stated at page 14 that:

"It is simply not physically possible to meet the entire housing need within the city's tightly drawn boundary, potentially at all and certainly without significant detrimental effects on other objectives, including protecting open space and avoiding functional floodplain. Housing completions over the previous decade and more have averaged at around 400dpa, which reflects that most housing in Oxford is delivered on small brownfield sites. In seeking to accommodate this level of need in full there will be pressure to use unsuitable sites or to build at densities that negatively impact character and quality of life. The focus on delivering this level of housing would significantly restrict the ability to bring forward other uses for which there is also a significant need in the city and to protect important green spaces and local character. But even with the pressure of the target and negative impacts, it is still not considered achievable."

The proposed housing requirement for the plan period is set out at Policy H1 of the Local Plan and it is derived directly from the HELAA and the capacity assumptions for residential development at proposed allocation sites. As such for the housing requirement to be justified it is necessary for the HELAA to contain accurate assessment of site capacity and to be sufficiently robust.

The Council is now suggesting a revised housing requirement of 9,041 dwellings per annum. However there has been no proposed amendment to the capacity of the Ruskin Field draft allocation despite the Council's own evidence and that submitted by the Promoter as part of the Regulation 19 consultation identifying that a cautious approach has been taken.

It is highlighted within this statement and previously made representations, concern about how the Council has reached conclusions regarding the capacity of sites, and assessment of anticipated delivery of such sites. It is considered that OCC has taken a significantly overcautious approach, particularly in respect of Ruskin Field (SPE 14), where there is a difference in anticipated minimum capacity of 62 dwellings. It is considered that the Council's approach does not reflect the requirements of the NPPF to make efficient use of land available, whilst still respecting the site specific constraints, to deliver sustainable development.

If this approach has been replicated throughout the SHLAA, it is questioned whether there is a greater ability for OCC to meet its Local Housing Need within its administrative boundary with less reliance upon neighbouring authorities to meet significant levels of unmet need, currently amounting to 12,519 dwellings.

³ [bgp-001-housing-need-requirement-and-mix-reg-19](#)