Twenty5 Cambridge
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Oxford Local Plan 2045 Examination

Stage 2 Hearing Statement

Matter 5 – Site Allocations

Issue 3 – Marston Road and Old Road Area of Focus

Policy SPE14: Ruskin Field, Headington

On behalf of Ruskin College and Welbeck Land

Respondent Reference: 120

Twenty5 Planning

November 2026

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1. Introduction

1.1 This Statement is submitted on behalf of Ruskin College and Welbeck Strategic Land V Limited (the Promoters) in response to the Inspectors' Stage 2 Matters, Issues and Questions. The Promoters reserve the right to comment further at later stages of the Examination.

1.2 This Statement assumes that the Plan is examined against the National Planning Policy Framework (December 2024) (the Framework).

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

1.4 The Site, including the access land, extends to 3.66ha (Appendix 1). It is identified for allocation at 'Policy SPE14: Ruskin Field'. The allocation site (3.51ha) is owned by Ruskin College (University of West London); the access land is owned by OCC (see Q1). Ruskin College has partnered with Welbeck Strategic Land V Limited to promote the Site and to prepare and submit an outline planning application for residential development with associated public open space, landscaping, infrastructure and access from Foxwell Drive. The Site is in a highly sustainable location on the edge of Headington, c.650m from the John Radcliffe Hospital, within walking and cycling distance of Headington's services and close to frequent bus services to the city centre (see Q3).

1.5 The Promoters support the allocation at Policy SPE14. However, the evidence prepared for the Site and shared with the Council under a Planning Performance Agreement (PPA) identifies no overriding constraint to its development, and shows that the policy's minimum of 28 dwellings significantly underestimates its capacity.

1.6 Survey work and pre-application design testing, shared with the Council and appended to this Statement, show that the Site can accommodate a 100-dwelling illustrative scheme (ECE Architecture, Illustrative Masterplan 7776-SK20 Rev P01, Appendix 2). Pending resolution of the matters raised by officers on 4 November 2026 (paragraphs 1.8 to 1.11), the Promoters seek a precautionary minimum of 60 dwellings. This would make a material contribution to meeting Oxford's housing need within the city.

1.7 Ruskin Field is suitable, available and achievable, and there is a realistic prospect of a minimum of 60 homes being completed within the five years following adoption of the Plan (2028/29–2032/33).

1.8 The Regulation 19 representations (March 2026) identified a capacity of c.130 dwellings. Since then, the scheme has been refined through the PPA design workshops, including scale and massing testing against key heritage and landscape views at the third PPA design workshop (May 2026), and in response to technical consultant advice. The result

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is a landscape-led illustrative scheme of 100 dwellings. Following a further PPA meeting with officers (4 November 2026), the capacity of the Site has been reviewed. Officers raised three matters: development of the eastern parcel, building heights and overall density. Pending their resolution through the planning application, and to provide a robust minimum figure, the Promoters have tested the Site's capacity on the following precautionary basis:

- Exclusion of the eastern parcel, subject to further heritage assessment, noting the central area would remain as undeveloped public open space preserving views to and from the Grade II listed Rookery building (c. 8 dwellings);
- Reduction in building heights, by removing one storey from the taller buildings so that no building exceeds three storeys (plus undercroft parking where shown), subject to further landscape and visual assessment. This is a particularly cautious approach: the taller buildings sit on the lower, northern part of the Site, whereas sensitivity to height lies on the higher ground to the south (c.13 dwellings); and
- A lower overall density across the site (c.19 dwellings).

1.9 These adjustments reduce the site capacity by 40 dwellings, to 60 dwellings.

1.10 This is considered a precautionary approach that would provide a robust figure on which the Council can rely for the purposes of its five-year housing land supply and in meeting housing needs. Importantly, it does not preclude a higher number of dwellings should these matters be resolved at application stage. On that basis, the Promoters consider that around 90 dwellings remain achievable.

1.11 The Promoters therefore seek a minimum of 60 dwellings in Policy SPE14. This updates the figure of 90 dwellings in their Stage 1 Statement (October 2026) and leaves headroom for a higher housing figure to be demonstrated through the future planning application.

1.12 This Statement responds only to those Questions which are directly relevant to the Promoters' Regulation 19 representations, in accordance with paragraph 20 of the Stage 2 Examination Guidance Note.

2. Site Boundary (Question 1)

Q1 What is the site boundary based on and is it justified?

2.1 The Promoters support the general extent of the allocation shown on the Policies Map and on the site plan at page 231 of the Submission Local Plan, which extends to approximately 3.51ha.

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2.2 However, the allocation boundary omits the land required to provide vehicular access from Foxwell Drive. This is despite criterion n) of Policy SPE14 identifying that *"Foxwell Drive is likely to provide the only option for vehicular access."* As drawn, the allocation therefore does not include all of the land necessary to deliver it. The Promoters are nonetheless satisfied that the access land can be secured, so this does not affect the deliverability of the allocation.

2.3 The access land is located between the western edge of the Site and Foxwell Drive and is owned by OCC. OCC, as landowner, has agreed to sell part of this land to Ruskin College to facilitate vehicular and pedestrian access from Foxwell Drive, as set out in the Promoters' pre-application submission (April 2025) and Regulation 19 representations. The access land is not located within the Old Headington Conservation Area. The suitability of the access is addressed under Question 3.

2.4 Proposed Modification: to ensure the allocation is effective, the Policies Map and the site plan accompanying Policy SPE14 should be amended to include the access land to Foxwell Drive, as shown on the Site Location Plan at Appendix 1 (total area 3.66ha).

3. Scale of Residential Development (Question 2)

Q2 How has the scale of residential development been established and is Policy SPE14 justified and effective, having particular regard to the context of the site and the need to make an efficient use of land?

3.1 The Promoters' Stage 1 Hearing Statement (Matter 2, Issue 2, Questions 4, 6 and 7) sets out their concerns about the Council's capacity assumptions for SPE14 and their effect on the housing requirement in Policy H1. That evidence is not repeated here.

3.2 Policy SPE14's *minimum* of 28 *dwellings* derives from the Strategic Housing Land Availability Assessment (SHLAA) (January 2026, ref. 463), which assumes delivery in years 11–15 of the plan period. The Sustainability Appraisal (Appendix C) states that the developer has expressed the intention to develop a minimum of 28 dwellings. That is incorrect: the Promoters' submissions at the Call for Sites (March 2025), Regulation 18 (August 2025) and Regulation 19 (March 2026) stages each identified a capacity of c.130 dwellings.

3.3 The evidence base does not justify the 28 dwelling figure. The Council's Site Capacity Assessment (CAP.020) does not identify a capacity. It acknowledges that *"Further testing may show that greater capacity is possible"* and that *"a cautious approach has been taken to calculating a minimum capacity"*. It applies 25dph to the northern field only and does not explain why the rest of the Site is excluded from development. Across the 3.51ha allocation, 28 dwellings equates to approximately 8 dwellings per hectare (dph). This approach is inconsistent with:

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- Paragraph 130 of the Framework, which requires that, where there is an existing or anticipated shortage of land for meeting identified housing needs, plans should avoid homes being built at low densities and ensure that developments make optimal use of the potential of each site, and, at paragraph 130(a), that plans meet as much of the identified need for housing as possible, which "will be tested robustly at examination";
- The Plan's own capacity-constrained housing requirement of 9,267 dwellings (463 dwellings per annum) against a local housing need of 1,087 dwellings per annum (Policy H1);
- Policy HD2, which expects sites to be capable of accommodating development at an increased density relative to their surroundings, with high suburban densities (indicatively over 60dph) expected in most other locations; and
- Background Paper 016 (Efficient Use of Land), which explains that a density of approximately 35dph has generally been assumed when setting minimum densities for allocations in semi-rural conservation areas. Applied to SPE14, this would equate to c.123 dwellings.

3.4 The Promoters have tested the capacity of the Site. The illustrative scheme has been developed through the PPA, including three design workshops with officers (November 2025, February 2026 and May 2026), and is informed by arboricultural, ecological, flood risk, landscape, heritage, acoustic and transport assessment. A 3D model of the Site and its context, incorporating a Zone of Theoretical Visibility, has been used to test scale and massing options with officers.

3.5 The resulting illustrative masterplan, building heights parameter plan and accommodation schedule (ECE Architecture, Appendix 2) show that the Site can accommodate 100 dwellings while responding to its constraints.

3.6 The design testing therefore demonstrates that the Site can accommodate substantially more than the 28 dwellings in Policy SPE14 while responding to its heritage, landscape, noise and technical constraints. Applying the precautionary adjustments set out at paragraphs 1.8 to 1.11 to this tested scheme gives the minimum of 60 dwellings sought.

3.7 The illustrative scheme comprises 31 houses and 69 apartments, including 38 family-sized homes of three or more bedrooms. It equates to a gross density of c.28dph across the 3.51ha allocation, and the minimum of 60 dwellings to c.17dph, both below the 35dph the Council assumes for semi-rural conservation area sites. The higher net density of the illustrative scheme (c.69dph) results from concentrating built development on 39% of the Site so that 61% remains open. At 40% affordable housing (Policy H2), the minimum would deliver at least 24 affordable homes, compared with c.11 under the current policy figure.

3.8 Criteria d) and i) require the undefined "southern part of the site" to be kept free from built development, citing a pond and "a greater potential for peat deposits". The Promoters can confirm here is no pond within the Site. The Promoters can also confirm there is no peat present following a full geoarchaeology survey completed in June 2026 (QUEST Geoarchaeological Fieldwork Report, Appendix 7).

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3.9 Because the area is undefined, the criteria are also not clear to decision-makers (Framework paragraph 16(d)). The illustrative masterplan instead retains a landscape buffer to the veteran trees and priority woodland along the southern boundary.

3.10 The Promoters proposed the following modifications:

3.11 Amend the first paragraph of Policy SPE14 to read:

"The minimum number of dwellings to be delivered is 60. A higher number will be supported where it is demonstrated, through heritage and landscape and visual impact assessment, that it would conserve the significance of the Old Headington Conservation Area and the setting of nearby listed buildings …"

3.12 Replace criteria d) and i) with:

"d) A landscape buffer, informed by arboricultural and ecological survey, should be retained to the veteran trees and the deciduous woodland priority habitat along the southern boundary of the site, with opportunities taken to extend and enhance that habitat and to provide integrated blue-green infrastructure."

3.13 The Promoters would also accept an additional criterion:

"Built development in the eastern field will only be permitted where heritage assessment demonstrates that the view from Stoke Place towards the hills to the north is preserved."

4. Access (Question 3)

Q3 Can a safe and suitable access to the site be achieved for all users, consistent with paragraph 115 of the Framework?

4.1 Yes. Criterion n) identifies Foxwell Drive as the likely only option for vehicular access, and vehicular, pedestrian and cycle access is proposed from there. The Promoters agree with criterion o) that Stoke Place is not suitable for vehicular access. Instead, Stoke Place would provide a pedestrian and cycle connection (with potential widening of its southern section), alongside a new link to the A40 path, improving permeability for new and existing residents.

4.2 Oxfordshire County Council, as Local Highway Authority, has agreed the principle of access from Foxwell Drive through its highways pre-application response, subject to a Stage 1 Road Safety Audit, a traffic count and vehicle tracking and visibility work. That work has since been completed. The access avoids the 'Tiny Forest' and can be delivered without the loss of any TPO trees. The small number of other trees affected would be replaced through new planting.

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4.3 The Promoters' Local Plan Hearing Transport Note (Paul Basham Associates, November 2026, Appendix 4) concludes that a safe and suitable access can be delivered from Foxwell Drive, and that the highway network, sustainable transport opportunities and access strategy can accommodate approximately 100 dwellings without any identified highway or accessibility constraints.

4.4 An access from the A40 has been considered and discounted. DMRB CD 123 states that direct accesses should not be used on trunk roads where an alternative access onto the local road network is feasible, as it is here.

4.5 The illustrative scheme of approximately 100 dwellings would generate around 52 vehicle trips in the AM peak and 50 in the PM peak. Trips would be spread between routes towards the A40 (via Saxon Way, Headley Way and Marsh Lane) and towards the Eastern By-pass (via Dunstan Road, Barton Road and London Road), with fewer than 30 movements likely through key junctions in the peak periods. The local road network can accommodate this. The development would not have an unacceptable impact on highway safety, and the residual cumulative impacts on the road network would not be severe (Framework paragraph 116).

4.6 The Site is highly sustainable and well located for sustainable travel, consistent with paragraph 115(a) of the Framework. The John Radcliffe Hospital is c.650m to the south, and the railway station is approximately 20 minutes by bicycle. The proposed connection to Stoke Place would provide a more direct route to Headington and the hospital, approximately a 12-minute walk or 5-minute cycle from the centre of the Site. Policy SPE14 criteria n) and o) are supported, and no modification is sought in respect of access.

5. Heritage (Question 4)

Q4 Is the allocation justified and consistent with national planning policy insofar as heritage matters are concerned? What information is available to demonstrate that the site can be developed in a way that preserves or enhances the character or appearance of the Old Headington Conservation Area and the setting of neighbouring listed buildings?

5.1 JB Heritage Consulting's Built Heritage Technical Note (November 2026, Appendix 5) assesses the significance of the heritage assets that may be affected and the contribution the Site makes to it. It concludes that the Site has capacity to accept the quantum of development proposed with only limited heritage impact. Its key findings are set out below and the Technical Note sets out the full assessment.

5.2 The Site (with the exception of the access land) lies within the Old Headington Conservation Area. There are no listed buildings within the Site. Of the 12 listed buildings within approximately 250m of the Site, the Technical Note identifies two as warranting assessment: the Grade II listed walls of the walled garden at Ruskin College (NHLE ref.

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1047296), approximately 150m to the south, and the Grade II listed Rookery, now part of the Ruskin College complex (NHLE ref. 1369369), approximately 200m to the south. Other nearby conservation areas, including the Central Conservation Area, have been scoped out using a Zone of Theoretical Visibility (see Q5).

5.3 The context of the Site has changed materially since the Conservation Area Appraisal (2011), including the large modern extension to the Rookery and the development of Barton Park (885 dwellings) immediately north of the A40. The Technical Note finds that Barton Park has introduced development of considerable scale into views northwards from the Conservation Area, including from Stoke Place.

5.4 Paragraph 36(b) of the Framework requires the Plan to be justified by proportionate evidence, and paragraph 208 requires the significance of any heritage asset that may be affected by a proposal to be identified and assessed. The Council's 'Heritage Impact Assessments – Local Plan 2045 (Updated post-Regulation 19)' (HER.008) does not assess the Site. It covers only those allocations "*identified as being of concern by Historic England (HE) during the preparation of the Local Plan*", and contains no assessment of Policy SPE14 or the Old Headington Conservation Area.

5.5 The only Council heritage commentary on the Site is a brief summary in the Site Capacity Assessment (CAP.020). It does not assess the significance of the assets, the contribution each part of the Site makes to them, or the likely level of harm, and it does not explain how the "very sensitive nature of the site" translates into 28 dwellings. It does, however, acknowledge changes to the area since 2011 and confirm that "the site is not within a view cone" and that "initial testing in views suggests development closer to the A40 is least sensitive". The illustrative masterplan follows that approach.

5.6 The Technical Note identifies the mitigation embedded in the illustrative masterplan, including the north–south green corridor, retention of the historic field boundaries, a green foreground to the key views across the eastern field, two-storey development in the eastern field, and heights that rise only as ground levels fall towards the A40.

5.7 On that basis, the Technical Note concludes that the scale of harm to the Old Headington Conservation Area, taken as a whole, would be low; that development would have only a negligible impact on the significance of the Grade II listed Rookery; and that it is not likely to give rise to any harm to the significance of the Grade II listed walled garden. There will be further opportunity at reserved matters stage to reduce any residual harm through detailed design. The Technical Note assessed the 100-dwelling illustrative scheme; the precautionary minimum of 60 dwellings, with no built development in the eastern field and lower building heights, would have a lesser effect.

5.8 Paragraph 212 of the Framework requires great weight to be given to the conservation of designated heritage assets. The harm identified would be less than substantial, at the

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lower end of that scale. Under paragraph 215, it should be weighed against the public benefits of the proposal.

5.9 The public benefits of the allocation include the delivery of a minimum of 60 highly sustainable homes (100 homes in the illustrative scheme), including 40% affordable housing; significant new public open space with public access across land that is currently private; new walking and cycling routes to Stoke Place and the A40 path; community allotments and growing spaces; and biodiversity enhancements. Giving great weight to the conservation of the designated heritage assets affected, these benefits clearly outweigh the low level of less than substantial harm identified. The allocation is therefore justified and consistent with national policy insofar as heritage matters are concerned.

5.10 Proposed Modification: to make criterion l) effective and consistent with Policies HD3 and HD4, it should read: *"l) Development must be accompanied by a Heritage Impact Assessment to assess the impact of the proposal upon designated heritage assets (Policy HD3) and non-designated heritage assets (Policy HD4)."*

6. Building Heights and Views – Criteria h) and j) (Question 5)

Q5 What is the justification for criteria j) and h), which require development to be 'kept low' and retain important views, including specific reference to the view from Stoke Place across the site to Elsfield?

6.1 Criterion j): the requirement for development to be *"kept low"* is undefined and subjective, and it is not evident how a decision-maker should react to a proposal (Framework paragraph 16(d)). It does not take account of the Site's varied topography (from c.73m AOD at the northern boundary to c.85.8m AOD at the southern boundary), the enclosure provided by mature boundary trees, or the changed context described above. The Promoters' studies, including the 3D model, indicate potential for development of up to 3 to 4 storeys in parts of the Site with only limited impact on the Old Headington Conservation Area, the Rookery or the Historic Core of Oxford.

6.2 Two-storey housing (7–9m) is proposed at the sensitive southern and eastern edges and 2.5-storey townhouses (up to 10.5m) in the centre, with apartment buildings of three and four storeys (12–18m, including undercroft parking) on the lower ground adjacent to the A40, which CAP.020 records as the least sensitive part of the Site. The precautionary minimum of 60 dwellings assumes one storey less on these buildings. Building heights should be established through the design process and the Landscape and Visual Impact Assessment required by criterion k), rather than by an undefined restriction.

6.3 Criterion h): the Promoters do not object to the principle that buildings should be carefully placed to retain views towards the hills to the north. However, the cross-reference to Policy HD6 is not justified. Policy HD6 relates to views of the historic skyline of the Historic Core

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Area. The Site does not form part of the Elsfield View Cone towards the Historic Core, as shown at Figure 1.2 of the Assessment of the Oxford View Cones (2015), and site assessment has demonstrated that built development at the Site would not be perceived from the Historic Core. The Zone of Theoretical Visibility informing the JB Heritage Technical Note confirms this (see Question 4).

6.4 The view from Stoke Place across the eastern field is identified in the Conservation Area Appraisal (2011), which pre-dates Barton Park. The JB Heritage Technical Note records that the western side of Stoke Place is now well vegetated, heavily filtering views across the Site even in winter, and that the identified view is localised and would be closed down further by summer foliage. Where views towards the northern hills remain, Barton Park is also visible and more prominent. The illustrative masterplan keeps the northern part of the eastern field and the green corridor open, and new public access across the Site will allow more people to appreciate views to the hills (Appendix 3).

6.5 Proposed Modification: replace criteria h) and j) with:

"h) Buildings should be carefully placed to retain views across the site towards the rural hills to the north, including from Stoke Place. j) Building heights should respond to the site's topography and sensitivity, with lower-scale development at the southern and eastern edges and taller buildings, of generally up to three storeys (plus undercroft parking where required), located in the northern part of the site adjacent to the A40, with any greater height to be justified through the Landscape and Visual Impact Assessment required by criterion k). Development should conserve the significance of the Old Headington Conservation Area and the setting of nearby listed buildings, with any harm assessed in accordance with Policy HD3."

Appendices

Appendix 1 – Site Location Plan

Appendix 2 – ECE Architecture: Illustrative Masterplan (7776-SK20 Rev P01); Parameter Plan – Building Heights (7776-SK21 Rev P01); Accommodation Schedule (7776-SA01 Rev P02); Proposed Site Sections (7776-SK07 Rev P01), Urban Design Framework (7776-SK23 Rev P01) and 3D Illustrative Massing Model Views (7776-SK30 Rev P01)

Appendix 3 – FPCR: Technical Note – Key Views (November 2025) and Photo Viewpoints A–J

Appendix 4 – Paul Basham Associates: Local Plan Hearing Transport Note (ref. 145.0009/LPHTN/1, November 2026)

Appendix 5 – JB Heritage Consulting: Built Heritage Technical Note (ref. 25.133, November 2026)

Appendix 6 – Stantec Technical Note – Acoustics (November 2026)

Appendix 7 – Quaternary Scientific (QUEST): Geoarchaeological Fieldwork Report (June 2026)
Appendix 8 – Aspect Arboriculture: Arboricultural Technical Note (November 2026)

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