Twenty5 Cambridge
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Oxford Local Plan 2045 Examination

Stage 2 Hearing Statement

Matter 7 – Type and Mix of Housing

Issue 2 – Employer Linked Affordable Housing – Policy H4
Ruskin Field, Headington (Policy SPE14)

On behalf of Ruskin College and Welbeck Land
Respondent Reference: 120

Twenty5 Planning
November 2026

Registered office: Twenty5 Planning Limited | 3 Wellbrook Court, Girton, Cambridge CB3 0NA | Company registration number 16526512

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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. 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 the Promoters' Matter 5 Statement). Ruskin College has partnered with Welbeck Strategic Land V Limited 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.

1.5 The Promoters support the allocation at Policy SPE14, but its minimum of 28 dwellings significantly underestimates the capacity of the Site.

1.6 The Promoters' position on the capacity of the Site is set out in their Matter 5 Statement. In summary, they seek a precautionary minimum of 60 dwellings in Policy SPE14, derived from a 100-dwelling illustrative scheme, pending resolution of matters raised by officers on 4 November 2026. A higher number may be demonstrated at application stage.

2. Issue 2 – Employer Linked Affordable Housing – Policy H4

Q1 What is the list of sites in Policy H4 based on?

2.1 The supporting text to Policy H4 explains that the listed sites have been chosen because they are suitable and available for employers to house their own essential workers on their own land (Submission Local Plan, page 27).

2.2 The list does not include Ruskin Field, even though Policy SPE14 allows the Site to include employer-linked affordable housing. Nor does the Site fall within the Policy H4 category for college campus sites. By contrast, Littlemore Mental Health Centre (Policy SPS9) has the same wording in its allocation and is on the list.

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2.3 As a result, the employer-linked housing that Policy SPE14 allows could not be delivered: Policy H4 permits it only on the listed sites, and only for staff of "the employer linked to the site". The two policies are inconsistent, and Policy SPE14 is not effective in this respect (Framework paragraph 16(d)).

Q2 Is Policy H4 justified, and how will it contribute towards the creation of balanced and mixed communities?

2.4 The Promoters support employer-linked affordable housing. The Plan recognises that Oxford employers, particularly the NHS, struggle to recruit and retain staff because of the cost of housing.

2.5 The Site is c.650m from the John Radcliffe Hospital, one of the city's largest employers. Employer-linked homes here would help Oxford University Hospitals NHS Foundation Trust (OUH) house its staff without using land needed for healthcare. OUH supports this.

2.6 However, limiting employer-linked housing to employers' own land has not worked. Under the equivalent policy in the adopted Local Plan (Policy H3), it has been delivered only on NHS hospital sites, and no applications were made in the last four monitoring years, 2021/22 to 2024/25 (Authority Monitoring Reports: AMR 2021/22, paragraph 4.23; AMR 2022/23, paragraph 4.21; SUP.004, paragraph 4.19; SUP.005, paragraph 4.17). Policy H4 takes the same approach, so it is likely to do little to meet essential workers' housing needs or to create mixed communities.

2.7 Allowing employer-linked housing on suitable allocated sites near major employers would widen delivery. Ruskin Field would combine market housing, social rented housing and employer-linked homes in one development, which is what a balanced and mixed community needs. Policy H2, including its social rent requirement, would still apply.

2.8 The Plan is also unclear about how employer-linked homes count towards affordable housing. The supporting text says they can count towards the intermediate part of the Policy H2 requirement but not the social rent part. At the 60-dwelling minimum, up to c.4 of the 24 affordable homes could be employer-linked.

2.9 Proposed Modifications are requested to make Policy H4 effective and consistent with Policy SPE14,:

- add "Ruskin Field (Policy SPE14)" to the list of sites in Policy H4;
- amend criterion c) to read: *"The occupation of the housing will be limited to households where at least one member works for the employer linked to the site or, on a site allocated for employer-linked housing that is not owned by the employer, for a key employer named in the affordable housing approach agreed with the City Council (for the duration of their employment)…"*; and
- move the clarification from the supporting text into the policy: *"Where employer-linked affordable housing is delivered as part of a mixed-tenure scheme that includes market*

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housing, Policy H2 will apply to the market housing element, and the employer-linked affordable housing may contribute towards the intermediate element of the Policy H2 requirement, but not towards the social rent requirement."

- alternatively, if the Site is not added to Policy H4, add to Policy SPE14: "Employer-linked affordable housing may be provided as part of the intermediate element of the affordable housing required by Policy H2, to meet the needs of staff of key employers in accordance with an affordable housing approach agreed with the City Council."

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