Twenty5 Cambridge
50-60 Station Road
Cambridge
CB1 2JH

Oxford Local Plan 2045 Examination

Stage 2 Hearing Statement

Matter 13 – Design and Heritage

Issue 1 – Design – Policies S2, HD1 and HD12
Issue 2 – Density, Views and Building Heights – Policies HD2 and HD6
Issue 3 – Heritage Assets and Archaeology – Policies HD3, HD4 and HD5
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

Twenty5 Cambridge
50-60 Station Road
Cambridge
CB1 2JH

Contents

1. Introduction 3
2. Issue 2 – Density, Views and Building Heights – Policies HD2 and HD6 4

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

Twenty5 Cambridge
50-60 Station Road
Cambridge
CB1 2JH

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' case 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. Higher number may be demonstrated at application stage.

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

Twenty5 Cambridge
50-60 Station Road
Cambridge
CB1 2JH

2. Issue 2 – Density, Views and Building Heights – Policies HD2 and HD6

Q4 How would Policy HD6 ensure that very high-density developments would not harm views of the historic skyline in the Historic Core Area? Is Policy HD6 sufficiently clear what is expected of applications for planning permission in respect of tall buildings that would exceed 15 metres in height?

Q5 Are the requirements set out in policies HD2 and HD6 justified, consistent with national planning policy and based on robust, up to date evidence? Have these requirements been adequately tested to ensure that they are viable and deliverable?

2.1 Policy HD6 deals with two different things: protecting the historic skyline of the Historic Core Area and the View Cones, and assessing tall buildings anywhere in the city. It should clearly separate the two, or be split into two policies.

2.2 Policy HD6 requires detailed assessment (criteria e) to g)) for any building over 15m anywhere in the city, or above a higher height set by the High Buildings Technical Advice Note (TAN). The TAN is not part of the development plan, and the Council has not explained the 15m figure. The TAN itself (HER.001a) says it is "neither necessary nor helpful to precisely define what a high building is", because this depends on context; its analysis shows that views are likely to change at heights ranging from 12m to over 100m. Policy HD6 also accepts that, even in the Historic Core Area, development is only likely to affect the skyline above 18.2m. A lower trigger for the rest of the city, further from the skyline, is not justified.

2.3 This affects the Site. Parts of the 100-dwelling illustrative scheme would exceed 15m, though no building would in the 60-dwelling minimum scheme (Matter 5 Statement). The Site is outside the Historic Core Area and the View Cones, although the Plan notes possible effects on views from the Elsfield View Cone. The Promoters' heritage assessment (JB Heritage Consulting, November 2026), using a Zone of Theoretical Visibility (ZTV), found that visual effects would be local, with no likely views between the Site and the Central Conservation Area.

2.4 Detailed assessment should therefore be required only where a ZTV shows that a building would be visible from the Historic Core Area or within a View Cone or its setting, not for every building over 15m.

2.5 Criterion f) requires *"VuCity 3D modelling (or equivalent if updated by the City Council in future)"*. The Plan should not require one commercial product when other 3D models produce the same results. It should refer to *"3D modelling, in a format agreed with and shared with the City Council"*.

2.6 Amend the paragraph introducing criteria e) to g) to read:

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

"Applications for any building that exceeds 15 metres and that is either within the Historic Core Area or, as shown by a Zone of Theoretical Visibility analysis submitted with the application, would be visible from the Historic Core Area or within a designated View Cone or its setting, will be required to provide the following information, proportionate to the likely impact:"

2.7 Amend criterion f) to read:

"3D modelling, in a format agreed with and shared with the City Council, so that the impact of the development can be understood from different locations, including any View Cone views that are affected; and"

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