

CIL Objection

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Headington Heritage
Saving Headington's Heritage
A Personal Blog

Introduction

The CIL charging schedule is **unsound** due the unusual concentration of exempt or low charged institutions that generate high demand for additional infrastructure, disbursement of funds to subsidise private industry leading to imposition high costs on a small business sector.

Oxford's Demographics

Oxford has only three primary sources of employment and growth, which in turn generates housing and infrastructure demand:

- Headington Hospitals – John Radcliffe, Churchill, Nuffield (NOC), (All Oxford University)
- Universities - Oxford, Oxford Brookes, University of West London (Ruskin)
- BMW

Only one of these, BMW must pay CIL.

It appears all the others pay £0 CIL as they claim charitable status so are exempt.

Further, very many of the large development sites identified in the Local Plan 2040, and much of the future growth for which CIL funding will be required, belong to the Universities and hospitals (Oxford University owned) which are the largest landowners in Oxford with ever-increasing expansions.

University CIL Rates

For example, the recent application from Oxford Brookes University:

21/01185/FUL | Demolition of twelve buildings (including main accommodation Blocks C, F, G, H, J, K, L and M) and erection of twelve buildings to provide student accommodation, with ancillary communal and social facilities and associated Of Blocks C F G H J K L And M Clive Booth Hall John Garne Way Oxford Oxfordshire OX3 0FN

Created a CIL liability as below using current rates, as per the submitted CIL Forms with the application:

$$£158 \text{ (student accommodation, current)} * 22,403 \text{ pcm} = £3.5m$$

Which was then given 100% relief as it claimed charitable status, so CIL = £0.

Hospital CIL Levels

In the case of Headington Hospitals (OUHT), with 4646 destination car parking spaces, development creates pressures via:

- Housing (staff increase)
- Traffic
- Flooding

adding to climate change, damaging the environment and creating a public health issue as described here:

<https://headingtonheritage.wordpress.com/current-issues/hospitals-kill-and-cure/>

)If redacted, Google Search: Headington Heritage Headington's Hospitals – Killing and Curing Us?)

It appears again, that these developments are treated as charitable exceptions.

Private Industry Subsidies

Conversely, it is not clear why the taxpayer in effect, is paying for infrastructure to support privately owned companies.

Changes to junctions, addition of schools etc seem to be in effect subsidising private development, although more justifiable in some cases.

Change Requested

Universities and Hospitals should pay standard CIL charges, so they must account for, and fund, the infrastructure they use, due to the highly unusual demographic of Oxford. This not the taxpayer charging the taxpayer, as it has the effect of encouraging Hospitals and Universities not to expand endlessly in a medieval city that can't cope, and make economically rational decisions based on the cost to the overburdened Oxford infrastructure.

Enforcing full payment of CIL would encourage these institutions to locate some parts elsewhere, eg Accounts and other non-location specific staff.

Currently, the entire burden falls onto businesses, a small minority in Oxford.

CIL rates should be set at a rate, and band, that does NOT subsidise private developers for private profit (eg Universities).

The following is required:

- Increase rates for all to standard, higher levels
- Review if charitable status a/ must be accepted b/ Is applicable for each and every development by a "charity"
- Review likely CIL NOT be received from the very large proportion of large sites that belong to the University of Oxford (Hospitals, the University) and Brookes
- Remove all private industry subsidies (eg Water companies)
- Re run the study to identify the correct CIL charging, which eventually is a tax on house purchases

Further Representations

I wish to be:

- To be kept informed of future stages of the charging schedule
- To request the representation is heard by examiner at the examination
- To be notified when the charging schedule is to be submitted to the examiner; when there is receipt of examiner's report; and when charging schedule is approved

Thanks

Mark Pott

Headington Heritage (already submitted data form)

05/01/2024