

JPPC ref: DB/6973

Planning Policy  
Oxford City Council

SUBMITTED VIA E-MAIL

21 December 2023

Dear Sir or Madam

**Partial review of the Oxford City Council Community Infrastructure Levy Charging Schedule- December 2023**

We write in response to your current consultation on the partial review of the Oxford City Council Community Infrastructure Levy Charging Schedule on behalf of the Oxford Centre for Islamic Studies (the Centre).

The Centre owns Harcourt House and the Government Buildings sites on Marston Road which are allocated for development in the current and emerging Oxford Local Plans. The allocation is to deliver a campus for academic purposes including residential development and/or student accommodation. The sites are longstanding allocations.

We are concerned that the viability assessment informing the proposed Charging Schedule does not appear to have considered the impact of proposed CIL charges on campus sites of the colleges and universities. Campus sites are fundamental to delivery of the existing and emerging Local Plans and have specific viability challenges. This is particularly concerning where schemes include residential and student accommodation, as is the case with the Centre's sites which are subject to high CIL rates.

Financial considerations for campus developments are very different to those for schemes undertaken by commercial developers. Campus developments undertaken by institutions, including that planned by Centre, are ordinarily only marginally viable given the higher build costs in providing the necessary quality of building and the responsibility to provide high quality accommodation. There is also limited scope for institutions to recoup development costs as there is no end sale or lease to release any uplift in land value.

The marginal viability of campus developments is acknowledged by the Council in existing and emerging Local Plan policies which exempt development of student accommodation in campuses from the normal requirement to contribute to affordable housing.

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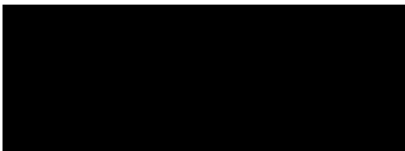
The delivery of development on campus sites is integral to delivery of the Local Plan, therefore care must be taken to ensure their delivery is not inhibited. We believe, having regard to the specific challenges of viability, there is merit in zero-rating campuses allocated for development in the Local Plan including that of the Centre.


Alternatively, the Council must ensure all necessary mechanisms are in place to enable relief from CIL for campus developments. We note the proposed Charging Schedule includes such mechanisms including mandatory relief for charitable institutions, and discretionary relief where CIL charges would make development unviable. We believe it is imperative that these are retained in the final schedule to ensure CIL does not prevent delivery of the Local Plan.

We trust these comments are of assistance and will be pleased to contribute further to the examination.

We wish to be notified when the proposed Charging Schedule is submitted for examination and when it is adopted by the Council. We also wish to be notified of any intervening consultation.

Yours faithfully,



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