Examination of the Oxford Local Plan 2045 – Stage 2 Hearings: Statement on behalf of Christ Church

Matter: Matter 11: Infrastructure and Viability

Issue: Issue 2: Viability (Policy S4)

Hearing Date: 03 December 2026 (Morning Session)

The following comments on selected questions in the MIQ's are submitted on behalf of Christ Church (ChCh). ChCh is one of the largest Oxford College's and a significant landowner in the City.

Matter 11: Issue 2 – Viability (Policy S4)

Q1 **Does the Local Plan Viability Assessment Update demonstrate that the growth proposed in the Plan will remain viable across all typologies in all locations?**

Q2 **The Viability Assessment states that where the cumulative impact of policies is concerned, the results are "…hugely variable and it is likely that some trade-offs between policy objectives will be required at the development management stage". It then goes on to recognise that "…this inevitably comes with the downside of a higher volume of site-specific viability testing at the development management stage." However, is this approach consistent with the Framework and the PPG? Paragraph 59 of the Framework advocates that where up-to-date policies have set out the contributions expected from development, planning applications that comply with them should be assumed to be viable?**

Q3 **Is the 'housing viability cascade' in Policy S4 justified and effective? In particular, does it prioritise the achievement of 'net zero' buildings over affordable housing delivery?**

1. The Local Plan Viability Assessment Update (LPVAU) does not demonstrate that the growth proposed in the Plan will remain viable across all development typologies and locations. The LPVAU acknowledges that ambitious policy requirements may not be achievable in all cases and that significant reliance will be placed on site-specific viability testing. This raises concerns regarding consistency with paragraph 35 of the NPPF, which requires Plans to set out policy requirements that do not undermine deliverability.

2. Policy S4 is inconsistent with the NPPF's expectation that viability should principally be addressed through the plan-making process (see paragraph 59 of the NPPF). The LPVAU instead anticipates a higher volume of viability testing and negotiations at the planning application stage. This suggests that site-specific viability assessments may become routine rather than exceptional, notwithstanding the NPPF's expectation that policy-compliant development should generally be assumed to be viable.

3. ChCh reiterates the concerns it raised about Policy S4 in its Regulation 19 response. The Council should reassess the overall policy burden to ensure that viability is properly addressed at the plan-making stage and that the Plan is consistent with the expectations of paragraphs 35 and 59 of the NPPF.

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East.

Savills (UK) Limited. Chartered Surveyors. Regulated by RICS.
A subsidiary of Savills plc. Registered in England No. 2605138. Registered office: 33 Margaret Street, London, W1G 0JD

savills