

Email:

Date:

18/11/2022



Rugby Borough Council,  
Town Hall  
Evreux Way  
Rugby CV21 2RR

By Email

Dear Madam/Sir

## Community Infrastructure Levy Draft Charging Schedule - public consultation

We write on behalf of our client, SDI Propco (100) Ltd, to make representation to the Community Infrastructure Levy Draft Charging Schedule public consultation.

We have reviewed the Community Infrastructure Levy Draft Charging Schedule and associated supporting documents and have the following comments.

Paragraph 18 of the CIL Draft Charging Schedule makes reference to “convenience retail” being exempt and “comparison retail supermarkets” being CIL chargeable. We consider this to be a drafting error as Table 1 and the accompanying (Community Infrastructure Levy Viability Assessment Review (October 2022)) make reference to “convenience retail” not comparison retail as being chargeable. Please amend Paragraph 18 accordingly.

As part of our client’s exciting proposals for their proposed global headquarters at the Frasers Campus, Rugby, Warwickshire it is proposed to provide on-site group accommodation which will be utilised by employees on long term training initiatives/apprenticeships and also employees that may be on site for long periods. The proposals are residential accommodation, but will not be market housing as it will not be available for sale or rent. Although in the early stages of design it is similar to student accommodation with individual self-contained bedrooms with ensuite and communal cooking areas.

Having reviewed the CIL Draft Charging Schedule we are concerned that such group accommodation could be considered to be CIL chargeable. We do not consider this to be intent of the document, particularly as the Council’s evidence base Viability Assessment Review details the methodology used to set the residential CIL rates which considered residential development underpinned by sales values and profits as being that appropriate for CIL.

To remove any potential confusion, we would request that Table 1 Note 2 is updated to read (suggested text underlined):

“Residential excludes onsite worker and trainee accommodation, student accommodation, HMO’s, sheltered housing.”

Quod | 8-14 Meard Street London W1F 0EQ | 020 3597 1000 | quod.com

Quod Limited. Registered England at above No. 7170188





I look forward to seeing the progress of this document, however, please do not hesitate to contact me should you require any further clarification on our comments.

Yours sincerely

[Redacted signature]

[Redacted signature]

Associate Director