

Our ref: Q220039
Your ref: CIL Consultation
Email: [REDACTED]
Date: 15 June 2023



CIL Consultation
Development Strategy Team
Town Hall
Evreux Way
Rugby
CV21 2RR

Dear Madam/Sir,

Rugby Borough Council Draft Community Infrastructure Levy Consultation

I write on behalf of SDI Propco (100) Ltd to make representations to the Council's draft Community Infrastructure Levy (CIL) charging schedule (Spring 2023). These representations follow those made in November 2022 - see attached at Document 1 for ease of reference.

As the Council will be aware my client has entered pre-application discussions regarding the creation of an employment led global headquarters campus for the Frasers Group. The proposals include on site group accommodation which will be utilised by employees undertaking training initiatives/apprenticeships and other employees. The accommodation will not be for permanent occupation, it is not market housing and therefore will not be for sale or rent (the factors used in the Council's viability evidence base), and will be used solely in connection with the wider campus. The accommodation is not, therefore, of the type that has been assessed in the Council's updated CIL Viability Review Assessment (Feb 2023) evidence base which underpins the draft charging schedule.

The Council has already identified as series of exclusions to the 'residential' development definition which are likely to cover the proposed group accommodation. However, for the avoidance of doubt and to reflect the Council's own evidence base, Note 2 of Table 1 should be amended as follows:

"2. Residential exclude student accommodation, on-site worker and trainee accommodation not for permanent occupation, HMO's, retirement ..."

I trust the above is clear and that the requested amendments will be incorporated. I would be happy to discuss that matter further with Council officers if that would be useful.

Kind regards

[REDACTED]

[REDACTED]
Senior Director

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Document 1

Email: [REDACTED]

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.”



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 name]

Associate Director