

29 July 2013

Delivered by email

Development Policy Manager
Development Services
Warwick District Council
Riverside House
Milverton Hill
Leamington Spa CV32 5QH

Dear Sir

WARWICK LOCAL PLAN : COMMUNITY INFRASTRUCTURE LEVY - DRAFT CHARGING SCHEDULE JUNE 2013

Thank you on behalf of the University of Warwick for the opportunity to comment on the draft charging schedule for the Community Infrastructure Levy which is being consulted upon alongside the new Local Plan.

The University is only concerned about the proposed charge for student accommodation, which we note is to be set at £80 per square metre, comparable with hotels, higher than retail uses and higher than most of the strategic housing sites.

We note that one of the exemptions under para 5.1 is for development by registered charities for the delivery of their charitable purposes.

The Viability Study prepared by BNP Paribas Real Estate in May 2013 states:

If the University continues to develop its own student accommodation, developments would be exempt from CIL under Regulation 43, providing the provision of student accommodation is consistent with the University's charitable objectives.

We anticipate that this would apply where the University develops student halls of residence on its campus in accordance with planning permissions obtained for such development (i.e. accommodation purpose built for students of the University and managed by the University).

We would like clarification of whether the exemption would apply if the University were to develop its own accommodation off-campus.

Another question arises from the purpose of setting a CIL for student accommodation in Warwick District. Para 2.2 of the consultation document states that the Infrastructure Delivery Plan (IDP) will identify all items of new or improved infrastructure that will be needed to mitigate the impacts of the planned development, and it goes on to state that much of the proposed infrastructure is included within the Revised Development Strategy.

Much of the new infrastructure will relate to the strategic sites for development and we note that, in respect of each, the Revised Development Strategy makes it clear that student accommodation will not form part of the housing mix. There are no proposals for student accommodation anywhere in the Local Plan.

It is slightly surprising therefore that student accommodation attracts such as high charge compared to other uses, when it appears to form no part of the overall development strategy for the district and therefore will place only limited pressure on community infrastructure where it occurs.

Authorities around the country are zero rating some forms of development, and in the case of Warwick District, offices, industrial and warehousing, and other forms of retail are subject to a nil charge. Superstores, supermarkets and retail parks which, in other parts of the country are being subjected to some of the highest CIL charges, are rated in Warwick at £75 psm which is lower than student accommodation.

Notwithstanding the University's exemption, it is concerned that sufficient student accommodation is provided in those areas where students wish to live and that any impacts of development and the use of that development are mitigated; however, it is surprised by the level of CIL charge and the apparent lack of any linkage with the infrastructure required to support development of student accommodation.

The District Council is separately consulting on a draft HMO and Student Accommodation policy and we will be making representations on that in due course.

We ask that these representations be taken into account and would be happy to meet and discuss with Council officers how and when the University's exemption would apply.

Yours sincerely

Mike Best
Executive Director

cc Bob Wilson, University of Warwick