

Matthew Wilson

From: Roy Warren <Roy.Warren@sportengland.org>
Sent: 03 September 2013 14:16
To: Core Strategy
Subject: RE: Hertsmere Borough Council - CIL Draft Charging Schedule Consultation
Attachments: 20130315 Preliminary Draft Charging Schedule.pdf

Dear Sir/Madam

Thank you for consulting Sport England on the CIL Draft Charging Schedule consultation.

I have reviewed the consultation documents and can confirm that our advice remains the same as that provided in response to the consultation on the preliminary draft charging schedule earlier in 2013. I attach a copy of this response and would be grateful if you could treat it as our response to the current consultation.

Let me know if you have any queries.

Regards

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 Planning Manager

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From: Core Strategy [<mailto:Core.Strategy@hertsmere.gov.uk>]
Sent: 25 July 2013 14:11
Subject: Hertsmere Borough Council - CIL Draft Charging Schedule Consultation

Community Infrastructure Levy Oraft Charging Schedule
Consultation period 26 July 2013 to 6 September 2013 (6 weeks)

Hertsmere Borough Council is in the process of preparing a Community Infrastructure Levy (CIL). CIL is a new charge that local authorities in England can place on new development in their area. The money generated through the levy will contribute to the funding of infrastructure to support growth.

Following consultation on a preliminary draft charging schedule, which took place between the 1st March 2013 and 3rd April 2013, a draft charging schedule has been produced. The Council considers that the draft charging schedule is ready for examination.

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Your ref:

Our ref: Local Plan/ Hertsmere

CIL Consultation
Policy and Transport
Hertsmere Borough Council
Civic Offices
Elstree Way
Borehamwood
Hertfordshire
WD6 1WA

15th March 2013

Dear Sir/Madam,

HERTSMERE CIL PRELIMINARY DRAFT CHARGING SCHEDULE

Thank you for consulting Sport England on the above consultation document. Sport England is the Government agency responsible for delivering the Government's sporting objectives. Sport England is also a statutory consultee on planning applications affecting playing fields.

While Sport England has no comments to make on the preliminary draft charging schedule itself, I would like to take this opportunity to make comments on the Council's associated Infrastructure Assessment and Infrastructure Funding Gap Assessment:

Infrastructure Assessment

Green Infrastructure and Other Community Facilities

Reference to the current infrastructure needs derived from the Council's Open Space Strategy and Playing Pitch Strategy in relation to leisure facilities and outdoor sport is welcomed as these are types of community infrastructure that should be considered in an infrastructure assessment that will support and justify the CIL. The reference in paragraph 7.19 to the two strategies being reviewed and potential changes arising being published as an update is also welcomed as this should hopefully address concerns previously raised by Sport England on the existing evidence base.

Following completion of the reviews, it is considered essential that site specific projects to address needs are identified and prioritised and subsequently costed. This is necessary to show that any contributions collected from CIL/planning obligations will be used in practice towards deliverable projects that have a relationship with the

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development. Without such detail there is a concern that it will not be possible to use CIL contributions towards sports facilities as it will not be possible to demonstrate that the contributions will be used to deliver sports facility infrastructure in practice.

For example, identifying (in paragraph 7.17) that Potters Bar currently has a shortfall of 2 mini-soccer pitches, one cricket pitch and a senior hockey pitch identifies the playing pitch needs in this area of the Borough but does not demonstrate that there are projects that contributions could be used towards for addressing these needs. Instead, Sport England would expect the Infrastructure Assessment see specific projects identified in Potters Bar to address these needs which should be prioritised to ensure that the limited resources that will be available are focused on funding projects that are the most important to the community as well as being deliverable e.g. the projects identified in the Playing Pitch Strategy Action Plan (or any update to this). This would be consistent with the approach taken in the Infrastructure Assessment to Green Infrastructure for instance.

Infrastructure Funding Gap Assessment

Reference in the Council's draft Regulation 123 list to playing fields forming part of the infrastructure requirements that are proposed for CIL funding is welcomed as the evidence base would support this and Consideration should be given to adding leisure/indoor sports facilities if the Council's review of the Open Space Study identifies any needs.

It is noted that there is a substantial funding gap in relation to playing fields. It would be helpful if the assessment provided details of how the total cost of playing field projects has been derived as it is difficult to provide informed comment on these costs and there is a lack of transparency about how the costs have been derived e.g. the total figure of £3,440,000 is substantially different to the total estimated cost of implementing identified projects in the playing pitch strategy (page 162). Without such information there is a potential concern that these costs may be challenged when the CIL is examined. Given the significant funding gap and the likelihood that CIL and other funding sources will not realistically meet this gap, as set out above, consideration should be given to prioritising playing field/outdoor sport projects for the purposes of CIL (and therefore reducing the total cost figure) unless it is considered that the funding gap could realistically be addressed from other funding sources. Sport England would prefer a smaller number of priority projects to be implemented within a reasonable timescale than potential funding from CIL and other sources being spread too thinly across multiple projects which may not be deliverable in practice.

I hope that these comments are helpful to you in progressing the CIL and the infrastructure assessment that supports it. I would be happy to discuss my comments further with the Council and provide additional advice if required.

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Yours sincerely

A handwritten signature in black ink that reads "Roy Warren".

Roy Warren
Planning Manager

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