

[REDACTED]

From: Planning Policy and Urban Design
Sent: 29 April 2021 15:27
To: [REDACTED]
Subject: FW: CIL Draft Charging Schedule

From: [REDACTED]
Sent: 18 March 2019 17:03
To: Planning Policy and Urban Design <planning.design@havant.gov.uk>
Subject: CIL Draft Charging Schedule

Dear Sir/Madam

Persimmon Homes welcomes the opportunity to comment on the Havant Borough Draft Charging schedule.

The company are concerned that the Viability Assessment underpinning the Draft Charging Schedule has not properly assessed the implication of the revisions to the Reg 123 list which will result in Education Contributions being secured as part of s106 contributions.

According to the Hampshire County Council Guidance: Developer's contributions towards Children's Services (November 2018), the s106 contributions per new dwelling will range between £10,338.66 and £13,642.56 depending on the approach adopted by Hampshire County Council to meeting the arising need. This figure is likely to increase to take account of Early Years' Provision. This is in comparison to the Viability Assessment's assumption of £3,000 per dwelling. Evidently this is approximately 346% difference as a minimum which should be adequately assessed for potential impacts on development.

Kind Regards,

[REDACTED]
Strategic Planner

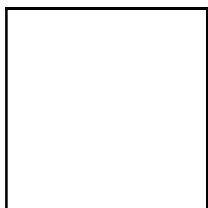
Persimmon Homes South Coast

Park View House | 100 Wickham Road | Fareham | PO16 7HT

[REDACTED]

www.persimmonhomes.com

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[REDACTED]

From: Planning Policy and Urban Design
Sent: 29 April 2021 15:27
To: [REDACTED]
Subject: FW: CIL Draft Charging Schedule Consultation

[REDACTED]

Sent: 18 March 2019 15:42
To: Planning Policy and Urban Design <planning.design@havant.gov.uk>
Subject: CIL Draft Charging Schedule Consultation

Dear Planning Policy Team,

Thank you for consulting Sport England on the above document. 'Sporting and recreation facilities' are included within the definition of Community Infrastructure Levy (CIL) infrastructure in the 2008 Planning Act (section 216) which means money raised can be used to fund new or enhanced sports facilities. Sport England is pleased to note that Sports development will be exempt from paying CIL. In order to provide an informed response Sport England has considered the following documents which will be referenced in the response:

- CIL Draft Charging Schedule Consultation document – including the Draft Charging Schedule at Appendix A and the revised Regulation 123 List at Appendix B.
- Infrastructure Delivery Plan – Update (January 2019)
- Draft CIL Regulation 123 List (2019) Explanation of Changes (pdf 213 kb)

The Draft Regulation 123 List sets out what CIL money will be spent on and by omission what will still be pooled from S106 Agreements. Based on the items of infrastructure identified on the Reg 123 list, CIL will not be used to fund provision, improvement, replacement, operation or maintenance of sport and recreation infrastructure including playing pitches, indoor and outdoor sports provision. It is therefore considered that S106 agreements will be used to fund on-site or nearby provision of green infrastructure, leisure, sport and open space infrastructure where required directly as a result of large scale development sites. Sport England would welcome clarification on the mechanism for ensuring that new development contributes to meeting its sport and recreation needs.

Havant BC's 2018 Indoor Built Facilities Strategy identifies a range of priorities to meet existing and future needs up to 2036. This includes:

- additional swimming pool space – equivalent to a 4-lane 25m pool;
- additional health and fitness provision;
- better use of existing sports hall capacity;
- opening up other sports hall facilities which are currently inaccessible to the community;
- replacement of some ageing pool and sports hall facilities.

Sport England welcomes the fact that the Infrastructure Delivery Plan (update 2019) refers to the findings of the recently adopted Indoor Built Facilities Strategy. Sport England would expect the Infrastructure Delivery Plan to be updated on the basis of the most recent evidence gathered and presented in the built facilities strategy.

I trust you find the above helpful. If you have any questions or require further assistance, please do not hesitate to contact me.

Kind regards,

[REDACTED]
Planning Manager

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]



[REDACTED]

[REDACTED]

National Sports Centre, near Marlow, Buckinghamshire, SL7 1RR

[REDACTED]

We have updated our Privacy Statement to reflect the recent changes to data protection law but rest assured, we will continue looking after your personal data just as carefully as we always have. Our Privacy Statement is published on our [website](#), and our Data Protection Officer can be contacted by emailing [Erin Stephens](#)

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Planning Policy,
Havant Borough Council,
Public Service Plaza,
Civic Centre Road,
Havant,
PO9 2AX

Date: 18 March 2019

Our ref: 04051/64/NT/CCK/17241525v1

Your ref:

Dear Sir/Madam

Havant Borough Council CIL Draft Charging Schedule Consultation: Representation made on behalf of Bourne Leisure

On behalf of our client, Bourne Leisure Limited ("Bourne Leisure"), we set out representations on Havant Borough Council's CIL Draft Charging Schedule (DCS).

By way of background to these representations, Bourne Leisure operates more than 50 holiday sites in Great Britain in the form of holiday parks, family entertainment resorts and hotels, and is a significant contributor to the national tourism economy, as well as local visitor economies. Within Havant, Bourne Leisure operates Sinah Warren Hotel and Lakeside Coastal Village.

Viability Assessment

Dixon Searle Partnership has prepared a Viability Assessment for the evidence base for the Local Plan. This has been carried out in two stages and published in separate study reports, November 2017 (Draft v6) and January 2019 (Final v7).

In respect of hotel development, we endorse the Viability Assessment which concludes that hotel uses show an insufficient viability to support CIL charging and we therefore agree with the associated "nil charge" rate.

It is noted that the Assessment has not tested any other types of tourist accommodation.

Draft Charging Schedule

The consultation Draft Charging Schedule provided in Appendix A subdivides development types into the following categories:

- 1 residential (one dwelling or more) *excluding extra care housing,
- 2 retail (retail warehousing and food stores),
- 3 all other retail, and
- 4 all other uses.

There is no specific definition of “residential” within the Draft Charging Schedule. The category only excludes extra care housing. This could introduce ambiguity when it comes to applying the CIL charge in the future.

Bourne Leisure considers that the Council should make it clear that the proposed “residential” CIL rate does not apply to purpose-built rental or static caravan holiday units within holiday parks or holiday resorts. This type of holiday accommodation is wholly distinct from residential development and is not comparable to other types of seasonal holiday lets that could also be used as dwellings. It is narrowly restricted to holiday use and can only be occupied while holiday parks and resorts are open. The units typically are used for short term lets of typically three, four or seven days at a time, by any family or group. As commercial premises, this type of holiday accommodation would be subject to payments of business rates, rather than council tax. Accordingly, it would not fall under the definition of a “dwelling” contained in the Local Government Finance Act 1992, cross-referenced by the CIL Regulations (2010, as amended).

For clarity, Bourne Leisure therefore proposes that the Council could take one of two routes to resolve this important issue:

- 1 Include a specific definition of “residential” within the Draft Charging Schedule which sets out what uses are excluded from the residential category. This definition should clearly specify that “purpose-built holiday rental or static caravan units within holiday parks or resorts” are excluded from this CIL category; or
- 2 Include “Purpose-built holiday rental or static caravan holiday accommodation within holiday parks or resorts” as a separate development category within Appendix A confirming that this would incur a zero rate CIL charge.

We trust that these representations are clear and will assist the formal independent examination. Please do not hesitate to contact either my colleague Ian York or me should you require clarification on any of the points made. We would also be grateful if you would continue to keep us informed of progress on all emerging planning policy and guidance for Havant Borough Council.

Yours faithfully,



Associate Director

Copy
Bourne Leisure