

London Borough of Croydon

Draft Community Infrastructure Levy Review Examination

Thank you for inviting Sport England to submit a hearing statement. We note that the content of our original representations will be considered. We wish to provide an additional comment in response to the following question;

Matters, Issues and Questions

Matter 2 - Community Infrastructure Levy Viability Review

1. How robust are the assumptions used in the Viability Review (March 2024) for residential development relating to:

- sales values*
- affordable housing tenure and values*
- build costs*
- profit margins*
- abnormal costs*
- finance costs*
- marketing costs*
- other assumptions, e.g., Biodiversity Net Gain*

Do such assumptions continue to remain valid?

SE Response;

As already set out in Sport England's supporting statement, there is no information in the viability review that explains how community sports facility buildings or commercial sports facilities were viability tested by the Council to justify charging CIL on sports facilities.

Please note that in relation to (other assumptions) biodiversity net gain the Government undertook a consultation in May 2025 and subsequently issued in a statement December 2025 that there will be some reform of the Biodiversity Net Gain requirements. The Government's May 2025 consultation document acknowledges that '*there is emerging evidence that some smaller developments and specific types of development are finding the operation of BNG is not as effective as it could be.*' The consultation document further acknowledges that '*We have heard, particularly from grassroots sporting groups, that the introduction*

of BNG has created additional cost burdens for these projects, making them unviable in some cases.'

The Government has not yet made any changes to the BNG regime so it remains the case that some community sport projects may remain unviable due to the impact of BNG. This further highlights the importance of the Council providing further evidence before requiring sport developments to pay CIL as it is already difficult to deliver these projects. Sport developments benefit resident's health and wellbeing and those advanced by the community sport sector can often only be delivered if they receive funding from external bodies such and public investment such as CIL monies. These types of development should not be subject to a CIL charge. CIL was introduced to collect money to fund community infrastructure projects like new sports facilities, so it seems unnecessary to then seek to reclaim the money by placing a CIL charge on these projects?

Link to the May 2025 DEFRA BNG consultation; <https://consult.defra.gov.uk/defra-biodiversity-net-gain/improving-the-implementation-of-biodiversity-net-g/>

Link to the statement on intended revisions to the NPPF;
<https://defraenvironment.blog.gov.uk/2025/12/17/planning-reforms-delivering-homes-supporting-farmers-and-protecting-nature/>