

Arun District Council

FAO: Simon Davis

By email only

17 January 2025

**Town & Country Planning (Development Management Procedure) (England)
Order 2015**

Application Reference: A/222/24/PL

Site: Sports Pavilion Decoy Drive Angmering BN16 4DN

Proposal: Demolition of existing pavilion; erection of new Sports and Community Hub comprising of new 3G football pitch, improved turf pitches for football, multi-use games area, locally equipped play area, hub building, storage facility, car parking, EV charging points, access road, landscaping, associated works and infrastructure

Sport England Reference:

Thank you for consulting Sport England on the above application.

Summary

Sport England **objects** to this application as it is not considered to meet any of the exceptions to our Playing Fields Policy or to accord with paragraph 104 of the National Planning Policy Framework (NPPF).

We would reconsider this position should amended/additional details be provided to address the following point(s):

Full details of the proposed relocation of the existing cricket NTP to be displaced by the proposed development to at least equivalent or better quality and quantity and its provision and availability for use before the existing NTP is lost.

Sport England – statutory consultee role and policy

We understand that you have consulted us as a statutory consultee in line with the above Order. Therefore, we have considered the application in light of the National Planning Policy Framework (NPPF), in particular paragraph 99, and Sport England's Playing Fields Policy, which is presented within our 'Playing Fields Policy and Guidance Document': www.sportengland.org/playingfieldspolicy

Sport England's policy is to oppose the granting of planning permission for any development which would lead to the loss of, or prejudice the use of:

- all or any part of a playing field, or
- land which has been used as a playing field land remains undeveloped, or
- land allocated for use as a playing field

unless, in the judgement of Sport England the development as a whole meets with one or more of five specific exceptions. The exceptions are provided in the Annex to this response.

The proposal and impact on playing field

The proposal is as set out in the description of development and in more detail in the accompanying playing field statement. It comprises principally the installation of a full size 3G Artificial Grass Pitch (3G AGP) on the existing sports ground together with two mini football mini pitches, a play area, a MUGA and an outdoor gym with new sports and community hub building, car parking, landscaping etc.

The proposal includes the displacement of the existing cricket NTP that is proposed to be replaced on a parcel of land to the immediate north of the existing sports ground that has planning permission for use as playing fields under planning permission ref: A/122/19/OUT. While Sport England accepts that due to this existing permission, no permission may be required for the additional grass pitches to be marked out on this land comprising one full size senior football pitch and four mini football pitches, we do not accept that planning permission is not required for the proposed replacement cricket NTP. Furthermore, to accord with our playing field policy and Paragraph 104 of the NPPF 2024, full details of the proposed replacement facility and a mechanism to secure its availability in advance of the loss of the existing is required as discussed in further detail below.

Assessment against Sport England's Playing Fields Policy and NPPF

Proposals of this type are assessed against exception 5 of our Playing Field Policy that says, *'The proposed development is for an indoor or outdoor facility for sport, the provision of which would be of sufficient benefit to the development of sport as to outweigh the detriment caused by the loss, or prejudice to the use, of the area of playing field'*.

Sport England's guidance, that can be viewed at the link above, advises that in assessing the benefit to sport the following matters will be considered,

That as a guide, may include whether the facility:

- meets an identified local or strategic need, e.g. as set out in a local authority and/or a sports national governing body strategy (rather than duplicating existing provision)
- fully secures sport-related benefits for the local community
- helps to meet identified sports development priorities

- Complies with relevant Sport England and national governing bodies of sport (NGBs) design guidance.

In addition, the guidance says that exception 5 is unlikely to be met if other users would be displaced without equivalent replacement provision. Sport England would expect that equivalent provision to be demonstrated against the criteria set out in the guidance for exception 4 and delivered for use before the existing facility is lost.

Sport England and the relevant NGBs, the Football Foundation and the ECB have been supportive of the scheme to date, subject to the satisfactory delivery of the replacement of the cricket NTP to at least equivalent quality and quantity on the new playing field to the north. However, there is no detailed assessment of the ability of that field to satisfactorily accommodate a replacement NTP (or natural turf football pitches) as yet and that information is required now and a mechanism for its delivery secured in connection with this application.

The ECB has commented,

The ECB would expect to see details of the new NTP both in terms of its specification and the boundaries available at this stage. At the time of writing, there are eight suppliers of NTPs that have ECB-approval, and the replacement should be installed by one of these eight. In terms of available boundaries, with a full size football pitch next to it, full boundary compliance should in theory be possible but, we require confirmation that this is the case via a complete, to-scale layout showing dimensions available for the northern parcel.

Installation of the new NTP should take place prior to the old being removed so there is no loss of playing season on-site.

Therefore, the ECB objects to the proposal as currently shared, subject to the concerns above being addressed.

The Football Foundation remains fully supportive of the proposed 3G AGP the outcomes of which will directly link to the FA 2024-28 Strategy for Women and Girls Football where one of the four priorities is to “Deliver equal opportunities for women and girls to play”.

The Arun District Council Playing pitch strategy 2019 states there is evidence of demand for one 3G pitch at Palmer Road Recreation Ground. One artificial grass pitch built to the FA’s specification would cater for the training requirements of local football clubs, while also providing sufficient capacity for wider use during the day from the local community and schools. The Arun District Council Local Football Facility Plan 2018 (LFFP) identified a future shortfall of four Artificial Turf Pitches (3G) for football. The LFFP priority project list identified the site for a 3G football pitch.

In the Arun District Council area there has been a significant increase in the number of women's and girls' football teams, increasing from 11 in 2028 to 34 in 2024. It is expected that this area of the game will continue to grow following the success of the England Lionesses that played in the UEFA Women's Euro 2022 in both Brighton & Hove and Southampton, that are main cities either side of Arun District Council. The introduction of an additional 3G will assist in this continuous growth of the women's and girls' game. The pitch is a 100m x 64m pitch. The AGP will cater for all formats of football. The 3G AGP design follows The FA Guide to Football Turf Pitch Design Principles and Layouts. Any 3G pitch to be used for FA affiliated football in England must be on the FA 3G pitch register. Teams hosting matches on a pitch that is not on the register are at risk of the league or competition imposing sanctions. This pitch will need to be on the FA Pitch register.

The Playing Pitch Strategy (PPS) identified that 15 grass pitches are overplayed, meaning that larger pitches have smaller pitches marked out across them, to meet the demand of various age groups. The PPS concludes that when considering future demand there is a shortage of 29 grass pitches of all age group sizes.

The inclusion of:

2 x 7v7 Mini Soccer Grass Pitch: 55 x 37m

1 x 5v5 Mini Soccer Grass Pitch: 37 x 27m

And

1 x Football pitch: 106 x 70m

4 x Mini Soccer Grass Pitches 37 x 27m

that fall outside of the planning application, are welcome additions to address the shortfall of grass pitches in the district.

The Playing Pitch Strategy identifies the venue as a Hub Site and recommends that the changing rooms, that are "poor quality" are considered for "improvement". This application fulfils this recommendation. The pavilion floor plans meet FA guidance and therefore supportive.

Sport England's position

Sport England supports the provision of the 3G AGP and other improvements proposed on the application site as proposed in principle but that is subject to the satisfactory reprovision of the cricket NTP on the northern field before the existing one is removed.

Given the above, Sport England raises a **statutory objection** to the application because it is not considered to accord with any of the exceptions to our Playing Fields Policy or paragraph 99 of the NPPF.

Determining the application

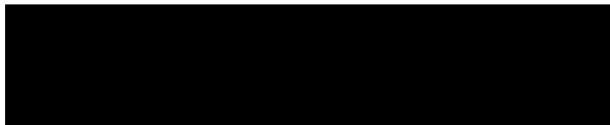
Should the local planning authority be minded to approve this application contrary to Sport England's statutory objection, then the Town and Country Planning (Consultation) (England) Direction 2021 requires the application to be referred to the Secretary of State, via the National Planning Casework Unit.

If you would like any further information or advice, please the undersigned.

Yours sincerely,

Jo Edwards
Planning Manager

She/her



Annex

The Five Exceptions to Sport England's Playing Fields Policy

Exception 1

A robust and up-to-date assessment has demonstrated, to the satisfaction of Sport England, that there is an excess of playing field provision in the catchment, which will remain the case should the development be permitted, and the site has no special significance to the interests of sport.

Exception 2

The proposed development is for ancillary facilities supporting the principal use of the site as a playing field, and does not affect the quantity or quality of playing pitches or otherwise adversely affect their use.

Exception 3

The proposed development affects only land incapable of forming part of a playing pitch and does not:

- reduce the size of any playing pitch;
 - result in the inability to use any playing pitch (including the maintenance of adequate safety margins and run-off areas);
 - reduce the sporting capacity of the playing field to accommodate playing pitches or the capability to rotate or reposition playing pitches to maintain their quality;
 - result in the loss of other sporting provision or ancillary facilities on the site;
- or
- prejudice the use of any remaining areas of playing field on the site.

Exception 4

The area of playing field to be lost as a result of the proposed development will be replaced, prior to the commencement of development, by a new area of playing field:

- of equivalent or better quality, and
- of equivalent or greater quantity, and
- in a suitable location, and
- subject to equivalent or better accessibility and management arrangements.

Exception 5

The proposed development is for an indoor or outdoor facility for sport, the provision of which would be of sufficient benefit to the development of sport as to outweigh the detriment caused by the loss, or prejudice to the use, of the area of playing field.

The full 'Playing Fields Policy and Guidance Document' is available to view at:

www.sportengland.org/playingfieldspolicy

From: Nicola Oktay on behalf of Planning.Responses
Sent: 21 January 2025 10:20
To: Planning Scanning
Subject: FW: A/222/24/PL ASRA SPORTS GROUND, CLUB HOUSE DECOY DRIVE, ANGMERING BN16 4DN (SE ref: PA/24/SE/AR/69509)
Attachments: 69509 Angmering Sports Hub.pdf

Sport England response

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www.arun.gov.uk

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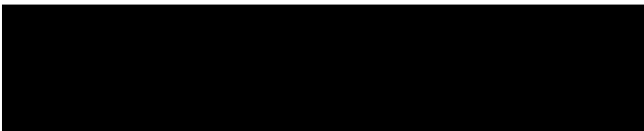
From: [Redacted] **On Behalf Of** Jo Edwards
Sent: 17 January 2025 19:53
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Subject: A/222/24/PL ASRA SPORTS GROUND, CLUB HOUSE DECOY DRIVE, ANGMERING BN16 4DN (SE ref: PA/24/SE/AR/69509)

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Please find attached our response to the above application consultation.

Yours sincerely,

Jo Edwards
Planning Manager



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