

Arun District Council

FAO: Hebe Smith

By email only

4 March 2026

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

Application Reference: FG/6/26/PL

Site: Little Twittens Recreation Ground

Proposal: Installation of new double non turf cricket training strip

Sport England Reference: PA/26/SE/AR/73107

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).

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 104, 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 described in full in the planning application. The strip would be sited in the southeast corner of the recreation ground and have an overall footprint of 30m x 5.48m as annotated on the proposed block plan.

Assessment against Sport England's Playing Fields Policy and NPPF

Sport England assesses this type of development against exception 2 of its playing field policy that is, *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.*

In assessing the proposal, Sport England has consulted with the ECB that has commented,

The proposal as presented is unsuitable, having a significant impact (de facto loss of playing field = 230m²) on the limited existing boundary – from fine turf pitches, as well as the existing, non-compliant (24m) non-turf pitch (NTP). The new surface being approximately just 28m from the NTP, significantly less than the absolute minimum recommended boundary for junior cricket (37m + 2.74m runoff).

There is also inconsistency between the proposed block plan (30x5.48m) and what Slatters/NottsSport have quoted for (7.66m wide).

The ECB advises the club to engage with their supplier and Sussex Cricket Foundation towards a fit-for-purpose installation and location on-site. For example, the NW and SW of the ground would both be potential locations for a non-turf practice facility, sitting comfortably outside of the boundary, and within the limits of good orientation.

Sport England's position

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 104 of the NPPF.

Potential to overcome the statutory objection

Sport England recommends that the ECB's advice is followed to achieve a compliant scheme that accords with ECB guidance and Sport England policy.

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 2024 requires the application to be referred to the Secretary of State, via the Planning Casework Unit.

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

Yours sincerely,

Jo Edwards

Planning Manager

She/her

[Redacted signature block]

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

PL- Consultation- Sports England response

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From: Hebe Smith <Hebe.Smith@arun.gov.uk>

Sent: 04 March 2026 12:51

To: Planning.Responses <Planning.Responses@arun.gov.uk>

Subject: FW: FG/6/26/PL LITTLE TWITTEN RECREATION GROUND, Sea Lane, Ferring BN12 5DY (SE ref: PA/26/SE/AR/73107)

Hello,

Please can this consultation response from Sport England be logged against FG/6/26/PL.

Thanks very much,

Hebe Smith (she/her)

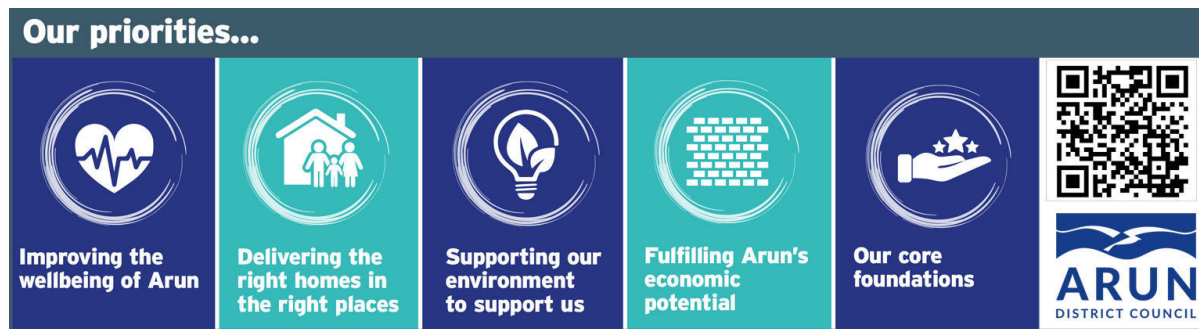
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From: [REDACTED] On Behalf Of Jo Edwards

Sent: 04 March 2026 11:59

To: Hebe Smith <Hebe.Smith@arun.gov.uk>

Subject: FG/6/26/PL LITTLE TWITTEN RECREATION GROUND, Sea Lane, Ferring BN12 5DY (SE ref: PA/26/SE/AR/73107)

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Please find attached our response to the above application consultation.

Yours sincerely,

Jo Edwards

Planning Manager

[REDACTED]

[REDACTED]



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