

Horsham District Council

FAO: Jason Hawkes

By email only

3 February 2026

Application Reference: DC/26/0012

Site: Mowbray, Sports Hub Sub-Phase, Wimland Road, Faygate

Proposal: Approval of Reserved Matters pursuant to condition 5 of OPP ref: DC/16/1677 for the sports hub including pavilion and covered spectator stands etc

Sport England Reference: PA/26/SE/HO/72844

Thank you for consulting Sport England on the above application. We have received the following comments from the Football Foundation that should be taken into account by the applicant and the Local Planning Authority in amending and determining the application.

“Relevant to affiliated football, the proposal provides two grass pitches, plus a stadia 3G pitch and associated ancillary facilities. The documentation references the intention for the stadia facility to meet step 4 requirements.

The grass pitches meet recommended dimensions for open age 11v11 football, including the 3m run-offs. A landscape specification has been prepared, aligned to relevant standards, and therefore we are supportive of these proposals.

The 3G pitch within the stadia facility is also to appropriate dimensions, and the technical information submitted confirms compliance with FIFA Quality accreditation. We would recommend that the testing to FIFA Quality standard, and placing the pitch on the FA pitch register, are a condition of approval.

We note however that there doesn't appear to be any technical detail showing infill retention measures for the pitch. Measures should be taken to manage and minimise the loss of infill from the playing surface. BSI Standards, working with the European Committee for Standardisation (CEN), have developed a Technical Report describing the procedures that should be used to control infill migration.

Design measures and procedures to control infill migration include:

- Fitting containment barriers on a pitch's perimeter fencing.

- Installing decontamination grates and boot cleaning brushes at all player and vehicle entrance gates.
- Ensuring all stormwater drains around a pitch have suitable microfilters to capture any infill being carried by surface run-off, etc.
- Keeping a dedicated maintenance brush within the boundaries of the pitch, so it cannot carry infill into the surrounding environment.
- Thoroughly removing any infill from maintenance tractors, etc. before they leave the pitch.

FIFA, World Rugby and the International Hockey Federation (FIH) have all included the recommendations of CEN into their certification programmes for artificial grass pitches. Contractors building fields that require certification should therefore include the measures within their designs.

For the remaining ancillary facilities, our observations are primarily aligned to compliance with Step 4 stadium accreditation requirements – given the application proposed facilities to meet this standard – as well as general design recommendations/best practice. We would advise as follows:

- The WCs adjacent to the changing rooms are not located within the changing rooms themselves, but in a shared lobby area. This does not fulfil the necessary requirements. We recommend relocating the entrance door to the WCs to the area where the sink is indicated, allowing access from the changing rooms.
- Unless there's a rationale for the lobby area along the northern edge of the pavilion, we recommend its removal. Access could be directly from the external of the building, providing independent access for opposing teams.
- Whilst not a stadium accreditation requirement, the facilities are also intended to serve the other community pitches. Showers should be provided in cubicles (four per changing area), not as open shower areas.
- Are the separate male and female WCs necessary? Could the disabled WC and baby change be moved to the location of the male WCs, and a single corridor of gender-neutral cubicles be provided?
- There's a requirement for spectators to access the building for WCs, but there may be merit in having some accessible from the external of the building closer to pitch-side. This is applicable to the two natural grass pitches, as it is acknowledged there is an additional WC facility provided adjacent to the stands for the stadia pitch.
- At Steps 1 to 5, there must be no Public Right of Way (see 'advisory' for definition) through an enclosed ground. The facility must prevent the ability for individuals from viewing the game comfortably from outside the ground (i.e. not have an unimpeded, significant view of the field of play, see both goal posts etc...). It is not clear whether this has been achieved via the proposal, therefore further clarity would be welcome.
- There must be a safe, unimpeded passage for players and match officials between the dressing rooms and the pitch. The design of the secure

walkway will inevitably differ from ground to ground and it will rarely guarantee the safe passage of players and match officials unless supplemented by stewards. A Club should implement procedures appropriate to the particular structure and be ready to respond to on-field situations which might affect spectator behaviour. The use of protection designed products such as permanent structures or retractable tunnels to separate players and spectators is recommended and should be secured in place when in use. Given the changing facilities are within a pavilion external to the enclosure of the 3G pitch, we would welcome further detail as to how this will be managed.

- Similarly, where segregation is deployed, refreshment facilities will be required in each segregated area of the ground. Where multiple large stands in a stadium exist, then refreshment facilities should be available so that all spectators have access to at least one facility. Detail as to how this requirement will be met is needed, as the pavilion facilities are outside the enclosure of the pitch.
- For grade 4, 2 spectator entrances that must be controlled by fully operational turnstiles of the revolving type and must be suitably housed and lit, however these do not appear to be indicated on the plans.
- There doesn't appear to be confirmation of the required directors' seats, as required by stadium accreditation. Nor press seating; all press seating must be provided with lighting and writing facilities for use by the press and other media. The press seating must have a clear view of the field of play. All press seating will ideally have an appropriate power socket for the charging of phones, laptops etc. per press seat. (2 are required at Step 4).

We recommend the applicant reviews the above guidance and implements design revisions to support compliance with stadium accreditation requirements to meet step 4, as stated as intended within the application.

A Community Use Agreement (CUA) has been provided in support of the application. Owing to the development of facilities to meet identified community needs, we would wish to ensure a suitable affordable pricing policy is incorporated to maximise community outcomes and usage. The present policy states "A policy of competitive pricing shall apply to maximise Community Use and in accordance within the spirit of this Agreement" however it is common to state that pricing will be aligned to comparable local provision (i.e. 3G pitches) to provide a suitable benchmark. We would welcome further detail on how the affordable pricing policy will be implemented, potentially with indicative pricing or suitable local facility comparisons included for reference."

If I receive any comments from the ECB I will forward them to you.

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

Yours sincerely,

Jo Edwards

Planning Manager

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cc Football Foundation, Sussex FA