

Horsham District Council

FAO: Matthew Porter

By email

17th April 2026

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

Application Reference: DC/26/0322

Site: STEYNING GRAMMAR SCHOOL, UPPER SCHOOL SHOOTING FIELD BN44 3RX

Proposal: Part-demolition of existing teaching buildings, MUGAs and all-weather pitch. Construction of replacement 2-storey and 3-storey teaching buildings, flood-lit all-weather pitch and hard surfaced sports courts, with associated access, parking, landscaping and infrastructure.

Sport England Reference: PA/26/SE/HO/73425

Thank you for consulting Sport England on the above application.

Summary

Statutory consultee role

Sport England raises **an objection** to this application as we do not consider it meets any of the exceptions to our Playing Fields Policy, nor does it 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. A summary of the exceptions is provided in the annex to this response.

Pre-application advice

The agent has previously engaged with Sport England at the pre-application stage on the proposal. In summary, Sport England considered a proposal that involves the loss of any hockey capacity at the school would be unacceptable unless full compensatory mitigation is identified and fully secured in advance of any loss of existing facilities in accordance with our policy. It further added that there was no evidence to suggest that additional sports hall space as proposed would outweigh the harm caused by the loss.

The Proposal and its Impact on the playing field

The existing playing field comprises two separate areas of playing field. The northernmost playing field accommodates athletics including a 400m running track; an artificial cricket wicket; mini-soccer and junior football pitches and rugby pitches. The southernmost playing field comprises a fine turf cricket pitch; rugby and football pitches; an artificial hockey pitch; as well as the 2no. 3-court hardsurface MUGAs.

From a sporting perspective, the proposal will result in the loss of the sand-based artificial hockey pitch; and playing field area on the southernmost section; the replacement of the 2no. MUGAs; provision of a new 3G rubber crumb Artificial Grass Pitch (AGP) with sports lighting and additional sports hall provision (2no. four-court sports halls).

Sport England considers that the application does not address the primary issue raised at pre-application stage, that is the proposed loss of the sand-based artificial hockey pitch without compensation. There is also encroachment onto the southernmost playing area from the proposed new parking and new school buildings which will reduce the capacity of the playing field to accommodate the existing playing pitches. As shown below, a full size rugby pitch has been laid out in this area.



Under the proposal, it will not be possible to provide a rugby pitch in this area. The proposed summer sport plans are also unclear as to whether a suitably sized boundary (which complies with ECB guidelines) can be provided for cricket. But it would appear that based on the drawing provided, it may not be possible.

We have consulted the national governing bodies for sport on the proposal, and we have received the following comments.

England Hockey maintains its strong objection to the proposed development at Steyning Grammar School, consistent with their position during the pre-application stage. The proposal includes the demolition of the existing school facilities, resulting in the loss of the sand-dressed Artificial Grass Pitch (AGP). This pitch is of critical importance for hockey as it serves as the established 'home' venue for two long-standing community hockey clubs: South Wick Hockey Club and South Down Hockey Club.

The Horsham Playing Pitch Strategy (PPS) clearly identifies the existing AGP as:

- A key hockey site within the district.
- The home pitch for two England Hockey member clubs; and
- The only full-sized, hockey-compliant sand-dressed AGP in the southern part of Horsham District.

The PPS explicitly states that such facilities should be protected, reflecting both current demand and the strategic need to retain accessible, community-use hockey provision. The loss of this pitch would therefore directly conflict with the strategic evidence base.

South Wick HC and South Down HC are both established clubs with strong community roots and have been identified through Hockey's South East Futures as priority clubs for junior development and participation growth.

The removal of their home pitch without appropriate replacement would:

- displace both clubs from their established base.
- severely impact their ability to train and host matches.
- place at risk the sustainability of both clubs.

England Hockey wishes to make it unequivocally clear that the provision of a 3G rubber crumb artificial pitch does not constitute appropriate mitigation for the loss of a sand-dressed hockey AGP. 3G surfaces are sport-specific, primarily designed for football and rugby, and are not suitable for competitive hockey. As such, they do not meet the technical or performance requirements for hockey and cannot replace the function of a hockey-compliant AGP.

Any loss of the existing AGP must be mitigated through the provision of a 'like for like' replacement, i.e. a full-sized, hockey-compliant sand-dressed AGP.

This replacement must be available prior to the loss of the existing facility; be located within a geographically appropriate catchment to serve the affected clubs; provide secure community use, including long-term access for South Wick HC and South Down HC.

The proposed development would result in the unjustified loss of a strategically important, hockey-compliant AGP, directly affecting two established community clubs and undermining both local and national sporting objectives.

In its current form, the proposal England Hockey therefore maintains its objection and requests that the application is either:

1. amended to retain the existing AGP; or
2. revised to include secured, policy-compliant 'like for like' re-provision.

Without such mitigation, the development is not supported by England Hockey.

The Football Foundation (FF) on behalf of the FA comments that their position remains unchanged. The FF is happy to support this application. However, there

are currently no details regarding the specifications and dimensions of the proposed 3G pitch and sports lighting. There is also inconsistency with reference to the artificial surface type. The FF asks for sight of the full design specifications for the pitch. The FF recommends that a Community Use Agreement be included and ask the consultant to consider and review community access to the pitch, as well as access to changing rooms and toilet facilities. The FF is happy to provide technical support and guidance once the relevant details are shared.

The FF adds that there is no up to date PPS and, therefore, demand for 11v11 3G AGPs has been calculated using the FA Training Ratio Model 1:38 as the starting point with further steering group interrogation. On the basis of 342 teams in Horsham (2024/25 affiliation data), there is a requirement for nine 11v11 3G FTPs. There are currently four 11v11 3G FTPs as well as one small-sided 3G FTP and the 11v11 pitch at Horsham RFC (which accounts for 0.25 of an 11v11 in this plan). Based on the total supply (4.5 11v11 3G FTPs), the FF considers that there is a current shortfall of 4.5 11v11 3G FTPs in Horsham based on their modelling.

Sport England has received no comments from the ECB (cricket) or any other national governing body for sport.

Assessment against Sport England's Playing Fields Policy and NPPF

Sport England considers that the application should be assessed against the E5 exception to our playing fields policy and paragraph 104 of the NPPF:

E5 - 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 does not support the loss of the hockey artificial grass pitch which is used and needed by 2no. community hockey clubs. The playing pitch strategy for Horsham is out of date now but that does not distract from the fact that the pitch is used for community sport. A sand-based pitch offers a multi-sport surface and we would argue offers greater flexibility for different sports, whereas a 3G rubber crumb surface is limited to football and rugby. We do not consider that the new 3G rubber crumb AGP represents suitable replacement provision given the impact that the artificial surface will have on community sport at the site, effectively displacing community hockey from the site. Sport England considers that the proposal should alternatively focus on investing in the existing pitch to bring it up to a better standard and quality.

Furthermore, the encroachment onto the southernmost playing field is from the extension of school buildings and associated car parking and is therefore non-sport development. This element of the development does not meet with the exceptions in our playing fields policy which allows for development on the playing field in specific circumstances.

Overall, the proposal is not considered capable of meeting the E5 exception in our playing fields policy, nor do we consider it accords with paragraph 104 of the NPPF. The benefits of the new sports facilities do not outweigh the harm caused by the loss of the playing field, which will reduce the sporting capacity of the site to accommodate playing pitches, including the loss of the artificial hockey pitch. This artificial pitch is used by 2no. community hockey clubs which will be displaced and is likely to affect the sustainability of these clubs. Furthermore, this loss is not supported by the evidence base (Playing Pitch Strategy) for the area, albeit that the evidence base should be updated.

Sport England's Position

Given the above, Sport England raises **an objection** to the application because it is not considered to accord with exception 5 of our Playing Fields Policy and paragraph 104 of the NPPF.

Should the local planning authority be minded to approve this application, then given Sport England's objection 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 this application is to be presented to a Planning Committee, we would like to be notified in advance of the publication of any committee agenda(s), report(s) and committee date(s). Please notify Sport England of the outcome of the planning application.

Please note that this response relates to Sport England's planning function only. It is not associated with our funding role or any grant application/award that may relate to the site.

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

Yours sincerely,

Owen Neal (MRTPI)
Planning Manager

[REDACTED]

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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