

Horsham District Council

FAO Matthew Porter

By email only

25th March 2026

Application Reference: DC/26/0366

Site: Land North West of Southwater.

Proposal: Outline planning application, with all matters reserved (except for primary access to the highway) for a phased development comprising: the demolition of existing buildings and the construction of residential dwellings (including affordable housing) (Use Classes C2 and C3); a mixed-use neighbourhood centre (Use Classes E and F); education facilities (Use Class F1(a)); business and employment floorspace (Use Classes B2, B8 and E(g)); redevelopment of existing agricultural buildings including construction of a building for community use (Use Classes E and F2); improvements to public rights of way; sports pitches; gypsy and traveller pitches/plots; public open space; landscaping, and associated infrastructure

Sport England Reference: PA/26/SE/HO/73304

Sport England's Position

Sport England **does not object** to the application as the impact from the increased demand of the development could be accommodated on-site or through CIL expenditure. This view is on the basis that certain conditions and S.106 Agreement planning obligations are imposed.

Thank you for consulting Sport England on the above application.

Sport England – Non-Statutory Role and Policy

The Government, within their Planning Practice Guidance (Open Space, Sports and Recreation Facilities Section) advises Local Planning Authorities to consult Sport England on a wide range of applications. Please see: <https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space>. This application falls within the scope of the above guidance as it relates to a development of more than 300 dwellings and the creation of new playing fields.

Sport England assess this type of application in light of the National Planning Policy Framework (NPPF) and against its own planning principles which broadly are:

- *Overarching* – To give significant weight to the benefits of sport and physical activity, including ensuring developments enable people to lead active lifestyles;
- *Protect* – To protect the right opportunities in the right places;
- *Enhance* – To enhance opportunities through better use of existing provision; and
- *Provide* – To provide new opportunities to meet the needs of current and future generations.

Further information on the objectives and Sport England's wider planning guidance can be found at <https://www.sportengland.org/guidance-and-support/facilities-and-planning/planning-sport>

The Proposal and Assessment against Sport England's Objectives and the NPPF

The proposal is in outline for a mixed use residential led development of approximately 1000 dwellings and 80 Extra-Care/Care Home units as well as supporting commercial, community and green infrastructure. This additional population will generate additional demand for sports facilities which if not adequately met will place additional pressure on existing sports facilities, thereby creating or exacerbating any deficiencies in facility provision in the local area. In accordance with the NPPF, Sport England seeks to ensure that the development meets any new community sports facility needs arising because of the development. In this context, Sport England provides the following comments on the community sports provision aspects of the planning application.

In view of the Local Planning Policy and Government Policy in paragraph 103 of the NPPF, it is considered that a robust local basis exists for justifying the provision of community sports facility provision to be made by this development proposal.

The application's approach to community sports provision is an area of playing field to the south of the site which is shown to accommodate two Football Pitches and a Cricket Pitch on the indicative Masterplan drawing. It is not fully clear if this would be supported by ancillary facilities, for example a changing pavilion. The Planning Statement also notes that playing pitches at the proposed secondary school could be used by the community and access can be secured through a Community Use Agreement (CUA).

Sport England also understands that Horsham District Council is a Community Infrastructure Levy (CIL) charging authority and that the proposal would be required to provide a CIL contribution. It is acknowledged that there is no requirement to identify where CIL funds would be directed as part of the determination of any

application however Sport England would encourage the Council to consider the sporting needs arising from the development and those identified by Sport National Governing Bodies and direct those funds to deliver new and improved facilities for sport based on the priorities identified. Sport England does note that, unfortunately, the Councils Playing Pitch and Built Sport Facility Strategies are out of date therefore should not currently be relied upon to provide a robust justification of community sport facility need.

Playing Field

The Planning Statement indicates that the Open Space provision exceeds Development Plan requirements that refer to the recommendations of the Council's Playing Pitch Strategy Open Space, Sport & Recreation Review 2021. Unfortunately, the submitted documents do not break down the requirement for playing field/pitches to demonstrate that it aligns with Development Plan requirements. In this respect, the Playing Pitch Strategy Open Space, Sport & Recreation Review 2021 indicates that for assessing playing pitch needs Sport England's Playing Pitch Calculator (PPC) should be used however the PPC should only be used based on up to date data from the Playing Pitch Strategy, which, as highlighted above, is out of date. It is, therefore, not clear if the proposed playing field/pitch provision would be sufficient to support the additional demand from the development and align with Local Policy.

Furthermore, it is not clear what has informed the indicative playing pitches shown, i.e. does to respond to a local need, as this does not appear to be detailed in the submission. Sport England appreciates that the proposed detail relating to the playing field/pitch layout and supporting ancillary provision is likely to be addressed at detailed reserved matters stage however at this stage it is important that the area of playing field land is confirmed and that the playing pitches needed to support the development can be accommodated on the proposed playing field.

As a result, the applicant should demonstrate in a plan(s) to scale that the proposed playing fields can accommodate the indicative playing pitches shown on the indicative drawings. The detail of what actual playing pitches and supporting facilities to be constructed can then be considered at the detailed design stage and informed further by Sport National Governing Body feedback on local needs and/or the recommendations of a robust and up to date Playing Pitch Strategy if Council have one at that time. Please note that if the playing field is intended to also accommodate areas of planting/biodiversity these would also need to be taken into consideration on any detailed plans as this may reduce the useable playing field area and/or restrict its usage for sport and physical activity.

Please note that that the PPC should be used as a starting point for informing how additional facility provision should be met in major new developments. It should not be interpreted that all the demand generated should be met on site as this may not be appropriate for meeting the needs of a particular facility type. For example, Rugby Union is a club centric sport and the impact of the additional demand might be best addressed by focusing investment on an existing rugby club site(s) where there are current capacity constraints. This would also help with club sustainability and avoiding club fragmentation if facilities are spread across multiple sites.

As noted previously, Sport England is aware that the Local Planning Authority (LPA) is likely to collect CIL in relation to the proposal therefore any shortcomings in community sport facility provision could be addressed through CIL expenditure which would be determined by the LPA at a later date. If the Council, however, intend to address any off-site community sport facility needs via a S106 Agreement or wish to address all sporting needs generated from the proposed development onsite then please contact Sport England for further advice.

Sport England would also request confirmation that a pavilion/supporting ancillary provision are proposed to support the playing field and these would contain appropriate facilities to support the use of the playing fields, e.g. align with the relevant Sport Governing Body Guidance. Sport England appreciates that details are likely reserved for a later date but an understanding that the supporting ancillary provision would be a sufficient size and design to support the sports played on the playing field should be secured at this stage. This parallels with the above point about ensuring there is sufficient space to accommodate the intended/required playing pitches.

Indoor/Built Sport Provision

Sport England advises considering demand generated by sports facilities not played on playing fields. The proposal appears to focus on playing field/pitches but has not accounted for how the additional demand generated for facilities such as Swimming Pools, Sports Halls, Tennis Courts, Padel Courts, Netball Courts, Bowls Greens, etc. will be met in a strategic manner. Although a Multi-Use Games Area (MUGA) is proposed which, depending on its size, design, layout, lighting and intended use, could accommodate some sporting demand.

Sport England's Sports Facility Calculator (SFC) <https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport/sports-facility-calculator> can help to provide an indication of the likely demand that will be generated by a development for the principal indoor sports facility types, Bowls Greens and Tennis Courts. Like the PPC, the outputs should be used as starting point for informing how

the additional demand generated by the development should be met. Please see the Appendix for the SFC outputs for an additional population of 2,400 in Horsham (population calculated by multiplying the number of new dwellings by the average household occupancy of 2.4).

Sport England would like to highlight that consideration needs to also be given to how provision can meet the needs of sports facilities not covered by the SFC outputs such as Padel, Netball, etc.

As noted above, Sport England acknowledges any shortcomings in community sport facility provision could be addressed through CIL expenditure but if the Council intend to address any off-site community sport facility needs via a S106 Agreement or onsite, please contact Sport England for further advice.

School Sports Facilities

Primary and secondary schools are proposed. The documentation highlights that the proposed secondary school could be accessed by the community outside school hours. The playing field/pitches are highlighted for community access but there are also opportunities for the Sports Hall (if provided) to be used. If the Council consider scope exists for school facilities to be available for community use outside of school hours then consideration should be given to how the facilities would be designed, constructed and maintained beyond the standard specification for meeting educational needs (based on meeting DfE guidance), for example the size of the Sports Hall, external lighting for MUGAs/Sports Courts and the scale and design of ancillary facilities. How this would be funded and secured through a planning permission should also be considered.

Formal Community Use Agreements should also be secured so access to the facilities can be ensured over a long-term period. It should be noted that school facilities alone are unlikely to be sufficient to meet all community needs due to school's needs/use which affect time facilities are available and the impact of wear and tear from school use.

Community Space

The community space proposed offers potential to provide space for some sports and physical activity, for example for Yoga, Dance, Martial Arts etc. if the community space is suitably designed. Sport England would suggest that the community space is designed to accommodate indoor sport and to ensure that provision is made in a planning obligation for a suitable specification to be delivered e.g. to address the size of any hall/space, changing/toilet, storage, flooring requirements

etc. Sport England's Village and Community Halls design guidance may be helpful in this regard (<https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/sports-halls>)

Trim Trail

The proposed inclusion of a trim trail is welcomed. This presents an opportunity to include an Active Track in the Green Infrastructure proposals as this would offer informal Athletics opportunities within the development. To ensure that an Active Track was delivered to a suitable specification provision would need to be made for it in a planning obligation. Sport England would, therefore, suggest that if the Council/applicant seek to deliver such provision that there is a commitment to deliver it at this stage. Sport England recommends that applicant liaises with England Athletics for an appropriate specification.

Phasing

The application only includes an indicative phasing strategy plan at this stage with the sports facilities/playing field being delivered in phase 2, although the proposed secondary school would be delivered in phase 1b. As the Council do not have up to date and robust assessments of sport facility provision for the area it is unclear if local sports facilities are already operating at capacity and whether they likely to be able to accommodate the additional demand generated from the early phases of the development. Furthermore, residents of the earlier phases of the development are likely to join sports clubs and use leisure facilities outside of the development if there are no on-site facilities provided in the early phases. In practice, once residents start using such facilities it is likely to be difficult to change habits once facilities are provided on-site at a later stage of the development. As well as placing pressure on existing facilities and potentially forcing residents to travel outside of the area to access facilities, this would also not contribute towards sustainability or developing a sense of community.

Planning Obligations and Conditions

A range of matters will need to be addressed at the reserved matter stage to help ensure that the detailed planning, design and layout of the sports facilities provided is acceptable and fit for purpose. Securing these matters through an outline planning permission is required to ensure that the matters raised above are satisfactorily addressed including consideration of whether the actual facilities proposed are responsive to local community needs at the time, whether the design and layout is fit for purpose and whether appropriate and sustainable facility management is in place. It is requested that the following conditions are imposed

and planning obligations are addressed if the LPA are minded to approve the application:

- 01) *No development shall commence until details of the design and layout of the playing field, Multi-Use Games Area and ancillary facilities have been submitted to and approved in writing by the Local Planning Authority [after consultation with Sport England]. The playing field, Multi-Use Games Area and ancillary facilities shall not be constructed other than in accordance with the approved details.*

Reason: To ensure the development is fit for purpose and sustainable and to accord with Development Plan Policy.

Informative: The applicant is advised that the design and layout of the playing field/pitches should comply with the relevant industry Technical Design Guidance, including guidance published by Sport England, National Governing Bodies for Sport.

- 02) *No development shall take place unless and until:*

- a. A detailed assessment of ground conditions of the land proposed for the new playing field land as shown on the illustrative masterplan shall be undertaken (including drainage and topography) to identify constraints which could affect playing field quality; and*
- b. Based on the results of this assessment to be carried out pursuant to (a) above of this condition, a detailed scheme to ensure that the playing fields will be provided to an acceptable quality (including appropriate drainage where necessary) shall be submitted to and approved in writing by the Local Planning Authority after consultation with Sport England.*

The works shall be carried out in accordance with the approved scheme within a timescale to be first approved in writing by the Local Planning Authority after consultation with Sport England.

Reason: To ensure that site surveys are undertaken for new playing fields and that any ground condition constraints can be and are mitigated to ensure provision of an adequate quality playing field and to accord with LP Policy

Informative: The applicant is advised that the scheme should comply with the relevant industry Technical Guidance, including guidance published by

Sport England, National Governing Bodies for Sport. Attention is drawn to Sport Englands' 'Natural Turf for Sport' guidance.

- 3) *Prior to the bringing into use of the playing field and ancillary facilities a Management and Maintenance Scheme for the facilities including management responsibilities, a maintenance schedule and a mechanism for review shall be submitted to and approved in writing by the Local Planning Authority after consultation with Sport England. The measures set out in the approved scheme shall be complied with in full, with effect from commencement of use of the relevant sports facility.*

Reason: To ensure that new facilities is capable of being managed and maintained to deliver facilities that are fit for purpose, sustainable and to ensure sufficient benefit of the development to sport and to accord with Local Plan Policy.

- 04) *Use of the secondary school hereby permitted shall not commence until a Community Use Agreement prepared in consultation with Sport England has been submitted to and approved in writing by the Local Planning Authority, and a copy of the completed approved agreement has been provided to the Local Planning Authority. The agreement shall apply to indoor and outdoor sport facilities, including playing field/pitches and ancillary facilities, and include details of pricing policy, hours of use, access by non-educational establishment users, management responsibilities and a mechanism for review. The development shall not be used otherwise than in strict compliance with the approved agreement.*

Reason: To secure well managed safe community access to the sports facility/facilities, to ensure sufficient benefit to the development of sport and to accord with Development Plan Policy .

Informative: Guidance on preparing Community Use Agreements is available from Sport England. <http://www.sportengland.org/planningapplications/>

- 05) *The natural turf playing pitches/playing field and ancillary facilities shall be used for Outdoor Sport and for no other purpose (including without limitation any other purpose in Class D2 Use Classes Order 2005, or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification).*

Reason: To protect the grass pitches and artificial grass pitches from loss and/or damage, to maintain the quality of and secure the safe use of sports pitch/es and to accord with LP Policy

Sport England would also recommend that a minimum specification is secured through a planning obligation for the sports facilities on the playing field site, including ancillary provision, and (if applicable) the schools and community space facilities. This would need to cover the minimum number and type of pitches, courts etc that the sites would be designed to accommodate, the minimum accommodation requirements for the ancillary facilities, the minimum parking requirements and the design guidance that the facilities would need to be designed in accordance with. Sport England would be happy to advise on any draft s.106 Agreement in this respect.

Conclusion

Although the extent of community sports facilities required to meet the needs of the proposed development is not overly clear at this stage due to the Council not having a robust evidence base, the proposal would provide some onsite playing field/pitch provision. Sport England also recognises that the LPA would be collecting CIL therefore, in theory, the non-playing field/pitch impact and any offsite playing field provision would be addressed through CIL expenditure. The proposal is, therefore, considered to align with its Planning Policy on the basis that the aforementioned conditions and obligations requirements are imposed if the LPA are minded to approve the application. Sport England, consequently, **do not object** to the proposal in this context.

If the LPA wish to amend the wording of the recommended conditions (or obligation requirements), or use another mechanism in lieu of them, please discuss the details with Sport England. We do not object to amendments, provided they achieve the same outcome and we are involved in any amendments.

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 agendas, report(s) and committee date(s). We would be grateful if you would advise us of the outcome of the application by sending us a copy of the decision notice.

Active Design

Sport England, supported by Active Travel England and Office for Health Improvement and Disparities, has produced 'Active Design' (please see <https://www.sportengland.org/guidance-and-support/facilities-and->

[planning/design-and-cost-guidance/active-design](#)) which is a guide to planning new developments that create the right environment to help people get more active. The guidance sets out ten key principles for ensuring new developments incorporate opportunities for people to take part in sport and physical activity. The Active Design principles are aimed at contributing towards the Government's desire for the planning system to promote healthy communities through good urban design, which is consistent with the NPPF. Sport England commends the use of the guidance in the masterplanning process for new developments.

The proposed development offers significant opportunities for incorporating the Active Design principles and Sport England welcomes that the illustrative Masterplan does appear to potentially incorporate many of the principles. Sport England suggest that a planning condition be imposed, if the LPA are minded to approve the application, requiring details to be submitted and approved which demonstrate how promoting physical activity has been considered in the design and layout of the development. This would help ensure that designing to encourage physical activity is given appropriate consideration in practice when reserved matters applications are prepared. The Active Design guidance includes a checklist that can be applied to developments and it is recommended that the checklist is used to inform the provision of such details and included in a document such as a Design & Access Statement. A suggested planning condition is as follows:

"For each parcel/phase of development for which Outline permission is granted, no development in relation to that parcel/phase shall commence until details have been submitted and approved in writing by the Local Planning Authority to demonstrate how Active Design principles have been met.

Reason: To promote healthy lifestyles through physical activity and to accord with Development Plan policy.

Informative: Consideration should be given to using the Active Design checklist in Sport England's Active Design Guidance to assess reserved matters planning applications"

We would also request that Active Design is considered through the maintenance and management proposals for the green infrastructure and that active travel options are promoted in residents' welcome packs to encourage walking and cycling. Sport England would be happy to discuss with the applicant in due course about how Active Design can be considered in the detailed proposals.

I hope that these comments can be given full consideration when a decision is made. I would be happy to discuss the response with the Local Planning Authority

and/or the applicant as the determination of the application progresses. Please contact me if you have any queries.

If you would like any further information or advice please contact me.

Yours Sincerely,

Mark Furnish

Planning Manager

Sport England

Appendix – Sports Facility Calculator Results for New Population of 2,400 in Horsham District.

Swimming Pools	
Demand adjusted by	0%
Square meters	25.92
Lanes	0.49
Pools	0.12
vpwpp	158
Cost	£598,988

Indoor Bowls Centres	
Demand adjusted by	0%
Rinks	0.05
Centres	0.01
vpwpp	8
Cost	£23,927

Sports Halls	
Demand adjusted by	0%
Courts	0.57
Halls	0.14
vpwpp	166
Cost	£454,530

Outdoor Tennis Courts	
Demand adjusted by	0%
Courts	0.3
vpwpp	47
Cost	£37,004

*vpwpp – visits per week in the peak period.