

Havant Borough Council

**FAO: Lesley Wells**

By email

17<sup>th</sup> July 2025

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

**Application Reference:** APP/25/00403

**Site:** HSDC HAVANT, NEW ROAD PO9 1QL

**Proposal:** Addition of a second story to existing changing facilities with additional balcony and external stairs to create a new sports facility (clubhouse and changing rooms) (Use Class F2). Alterations to doors and windows and installation of disability access ramp.

**Sport England Reference:** PA/25/SE/HV/71110

Thank you for consulting Sport England on the above application.

**Summary**

Statutory consultee role

Sport England raises **no objection** to this application as it is considered to meet exception 2 of our Playing Fields Policy and to accord with Paragraph 104 of the National Planning Policy Framework (NPPF). However, we consider that the design and layout should be improved to provide for better accessibility and safeguarding.

**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](https://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.

### **The Proposal and its Impact on the playing field**

The proposed development consists of the addition of a second story to existing changing facilities with additional balcony and external stairs to create a new sports facility (clubhouse and changing rooms) (Use Class F2).

Sport England considers that there is no impact on the playing field/pitches at the site as a result of the proposed development.

Sport England has consulted with the national governing bodies for sport and we have received the following comments. England Hockey comments that Havant Hockey Club is the only hockey club within the borough and urgently requires significant upgrades to its existing facilities at Havant & South Down College. Both the 2018 Playing Pitch Strategy and the 2024 review clearly identify two key priorities for the club:

- *“Havant Hockey Club will require a new clubhouse and adequate car parking to support the two new AGPs needed to meet both current and future demand for hockey.” (p.24, 2024)*

England Hockey supports the proposed development at South Downs College, which aims to create a safe and welcoming environment for both the club and the wider community. However, EH wishes to see the applicant address certain technical aspects of the current design to ensure the facilities are fully accessible and inclusive for all current and future users. EH advises a review of Sport England's latest guidance on accessible and inclusive design: <https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/accessible-inclusive>.

The following should be incorporated:

- **Changing Areas:** each changing room should include at least one toilet/WC cubicle. This helps minimize movement outside the changing area and reduces potential welfare concerns, particularly for young people leaving the changing room.

- **Seating in Changing Rooms:** while the minimum space allocation per person is 500 mm, England Hockey recommends increasing this to 600 mm, in line with cricket standards. This allows for the larger squad sizes and the volume of personal equipment typically brought to matches or training.

- **Showers:**

England Hockey is not supportive of communal showers. England Hockey recommends incorporating floor-to-ceiling partition systems wherever possible to improve privacy and safety. Additionally, EH advise including at least one-fold-up shower seat in shower area to accommodate various needs, such as pregnancy, injury-related instability, or balance issues. This seat should be foldable to maximize space when not in use.

In principle, England Hockey supports the proposed development, but they would wish to see some slight improvements to the design and layout of the facility as highlighted above.

### **Assessment against Sport England's Playing Fields Policy and NPPF**

Sport England considers that the E2 exception in our playing fields policy applies in this case. This states:

*E2 - 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.*

Sport England is satisfied that the proposal is capable of meeting the above exception given that there is considered to be no impact on the playing field or pitches at the site. However, England Hockey as the governing body for hockey raise some relevant points in relation to the design and layout of the facility. We consider that the design and layout can be improved to ensure safeguarding and welfare of all potential users as well as to make it more accessible, and we would ask that the applicant responds positively to these comments and seeks to amend the plans accordingly.

### **Sport England's Position**

Given the above, Sport England raises **no objection** to the application because it is considered to accord with exception 2 of our Playing Fields Policy and paragraph 104 of the NPPF.

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,

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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](http://www.sportengland.org/playingfieldspolicy)