

Cumberland Council

By email only

Date: 30 October 2025

Dear Sir/Madam,

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

Application Reference: 4/25/2338/0F1

Site: THE WHITEHAVEN ACADEMY, CLEATOR MOOR ROAD CA28 8TY

**Proposal: INSTALLATION OF 2 NO PACEMAKER282 MK8 PORTACABINS TO BE USED
AS CHANGING ROOMS.**

Sport England Reference: PA/25/NW/CU/71966

Thank you for consulting Sport England on the above application.

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

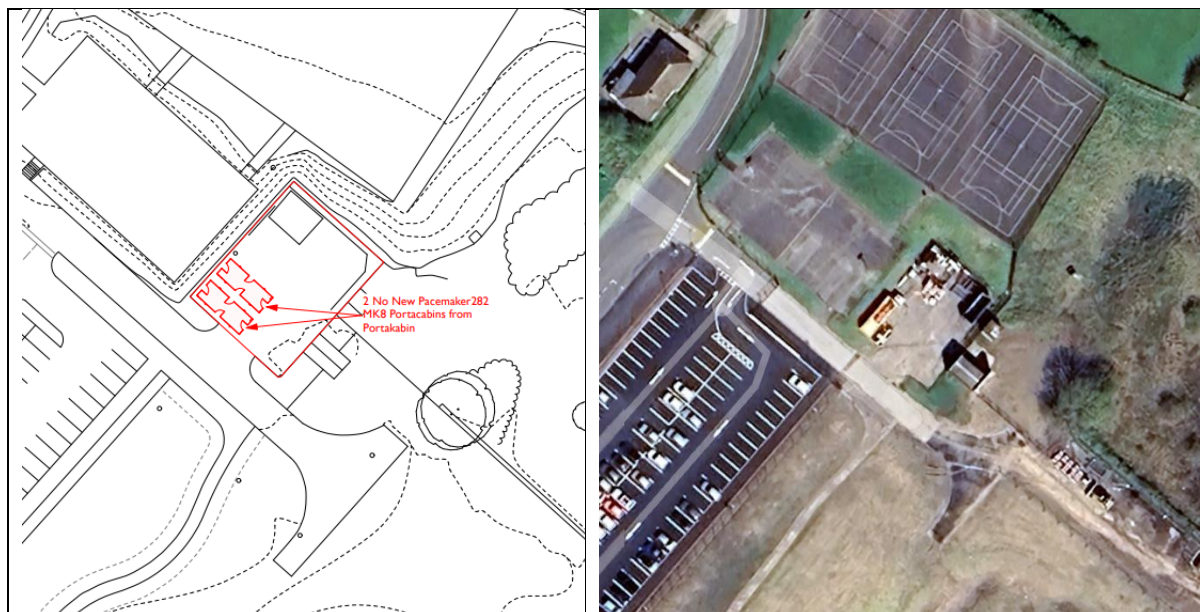
Sport England's policy is to oppose the granting of planning permission for any development which would lead to the loss of, or prejudice the use of:

- 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 for the installation of two no pacemaker282 mk8 portacabins to be used as changing rooms.



The Views of the National Governing Bodies for Sport

As part of the assessment of this consultation, Sport England has sought the views of the following National Governing Bodies for Sport. These Governing Bodies act as Sport England's technical advisors in respect of their sport and their sport facilities.

The comments of Football Foundation (FF), who provide comments to Sport England on behalf of the Football Association, have been summarised as:

- *This is a site which we Cumberland FA uses quite a lot in partnership with the West Cumbria Youth League. It has 3G pitch usage on Mondays, Wednesdays, Saturdays and Sundays each week during the season, so extensive community use in place.*
- *The Academy already has compliant changing spaces within the school which are available for the community users to access, however they are a fair walking distance from the 3G pitch which is why the Academy is looking at other options closer to the pitch. Cumberland FA understands that this proposal is more to support PE lessons, as the school has had an increased*

intake this year and they would act as an overspill area when the existing changing rooms internally are at capacity at lesson times.

- *FF and CFA understand these cabins are a short-term fix for the school and don't expect community users to access them as they are acknowledged by the applicant not to be compliant or meet expectations for community sport, with no toilet provision which is a minimum requirement.*
- *FF role in providing comments to Sport England is primarily to give a view based on meeting demand and needs for community sport.*
- *FF is content that compliant facilities exist for community users elsewhere onsite, therefore takes a passive position on this proposal.*
- *There is however no detail of interior fittings within the cabins, so FF advises the applicant ensures no welfare/safeguarding risks or concerns with respect to school use and guidance.*

The comments of the Rugby Football League (RFL) have been summarised as:

- *No objection to the proposals, the changing rooms should add value to the existing rugby league playing stock encouraging more participation.*
- *Can't give technical advice on suitability as detail has not been provided, other than the square metrage of each changing room. The location as identified on 6166 002 Location Plan does not appear to impede any of the existing RL playing pitch provision either at the Academy or at Hensingham Rugby League Club.*

Assessment against Sport England's Playing Fields Policy and NPPF

Sport England considers proposals of this nature against Policy Exception E2 of Sport England's playing Fields Policy which states:

'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.'

The plans show that the proposal will be located on a hard standing and will not impact on the grass pitches nor the multi use games area.

There is only limited detail of the proposal and Sport England is unable to find any layout plans of the proposed changing rooms, so we cannot provide any

comments on the suitability of the design. The FF have commented that they advise the applicant ensures no welfare/safeguarding risks or concerns with respect to school use and guidance.

Sport England would be grateful if a copy of this letter can be forwarded to the applicant so that they can consider the advisory comments made by the FF. Sport England also has guidance on changing rooms and the applicant might like to refer to this: <https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance>

Sport England notes that the portacabins are to be used as changing rooms, prior to the construction of the new extension to the school, and Sport England is aware of a separate planning application (4/25/2342/0F1) for a proposed dining and changing room extension.

Sport England's position

Given the above, Sport England raises **no objection** to the application because it is considered to accord Exception E2 of our Playing Fields Policy and paragraph 104 of the NPPF.

The absence of an objection to this application, in the context of the Town and Country Planning Act, cannot be taken as formal support or consent from Sport England or any National Governing Body of Sport to any related funding application, or as may be required by virtue of any pre-existing funding agreement.

Yours sincerely,

R. Fordham

Richard Fordham BA(Hons), DipTP, MTP, MRTPI, AIPROW
Planning Manager

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