

Cumberland Council

FAO: Christie Burns

By email only

Date: 18 November 2025

Dear Sir/Madam,

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

Application Reference: 4/25/2344/0F1

Site: Millom School, Salthouse Road, LA18 5AB

Proposal: Proposed new access road from Salthouse Road to the facility

Sport England Reference: PA/25/NW/CU/72109

Thank you for consulting Sport England on the additional information in response to Sport England's representation of the 18 November 2025.

The additional information includes an email dated 25 November 2025 from Stuart Ainsley and an amended layout plan.

The views of the National Governing Bodies for Sport

Sport England sought the views of England Athletics on the additional information, but at the time of writing, no comments have been received.

Assessment against Sport England's Playing Fields Policy and NPPF

In Sport England's representation of the 18 November 2025, we stated that:

Sport England would be pleased to review the objection with a view to considering potentially withdrawing it if the applicant can provide the following:

- 1. Site plans at an appropriate scale that addresses England Athletics comments. They should clearly show how the development proposal*

would not have an adverse impact on the active track and its safety run off area, including its sports lighting.

2. *Reassurance and clarification as to the proposed measures to ensure the continued use of the playing field during construction works.*
3. *Given the proposed encroachment onto the playing field, clarification is sought as to whether the applicant is willing to enter into a community use agreement to secure the benefits to community sport, if one is not in place already.*

Sport England has reassessed the planning application having regard to our previous comments on the most recent consultation documents. Taking the above issues into account, Sport England makes the following comments:

Issue 1: Site plans at an appropriate scale that addresses England Athletics comments.

The applicant has now provided a detailed plan of the proposal and shows the athletic facilities on the plan. The plan includes fencing and shows that the road and fence will be clear of the athletics facilities.

Sport England did consult England Athletics (EA) on the suitability of this plan, but we did not receive a response from them. Ideally, Sport England would have liked confirmation from EA that the plan was acceptable, as they act of Sport England's technical advisors in respect of their sport facilities.

In the absence of any technical comments from EA, Sport England has reviewed the submitted plan and consider that it has addressed the matters previously raised by EA.

Issue 2: Reassurance and clarification as to the proposed measures to ensure the continued use of the playing field during construction works

Sport England notes that the additional information states:

"There will be no conflict with the track. During construction there will be minimal disruption, Contractors Thomas Armstrong are currently on site building the new community leisure facility behind the school, they access the site from this location on a temporary road, this works would make that temporary access permanent. The contractor and myself regularly engage with the school and running club to ensure all parties interests are protected, with disruption kept to a minimum."

Issue 3: Community Use

The applicant has provided comment that the school already has community use.

Sport England's position

The proposal will run along the southern boundary of the playing field. The Football Foundation have provided comments to Sport England that the road allows for better access to the site, which is likely to have a positive effect on overall usage.

The proposal would have a small encroachment onto the playing field. However, having considered the nature of the playing field, and its ability to accommodate pitches, it is not considered that the development would reduce the sporting capability of the site. As previously stated, the road allows for better access to the site, which is likely to have a positive effect on overall usage.

Consequently, Sport England are of the view that the proposal broadly meets exception E3 of our playing fields policy, in that:

'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.'*

Given the above, Sport England raises **withdraws its objection** to the application because it is considered to broadly accord Exception E3 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