

Cumberland Council

By email only

Date: 26 November 2025

Dear Sir/Madam,

Application Reference: 4/25/2342/0F1

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

Proposal: Variation of condition 2 (plans) for variation in design of planning application 4/24/2149/0F1 proposed dining & changing room extension

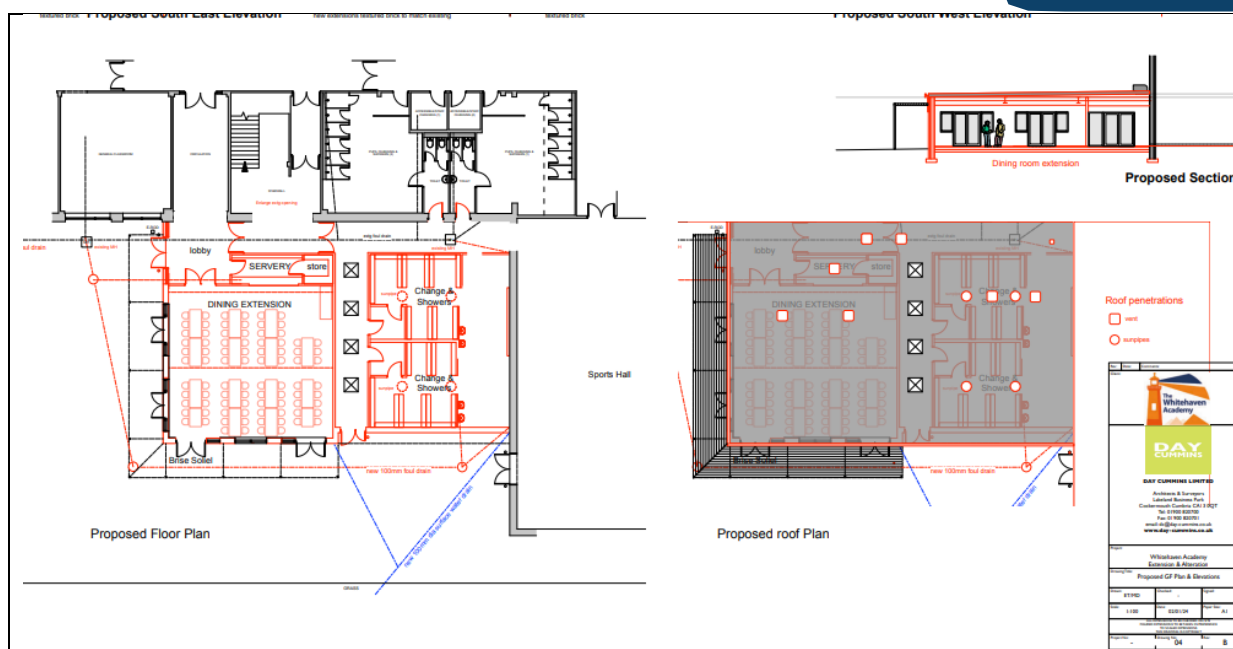
Whitehaven Academy

Sport England Reference: PA/25/NW/WAF/70574

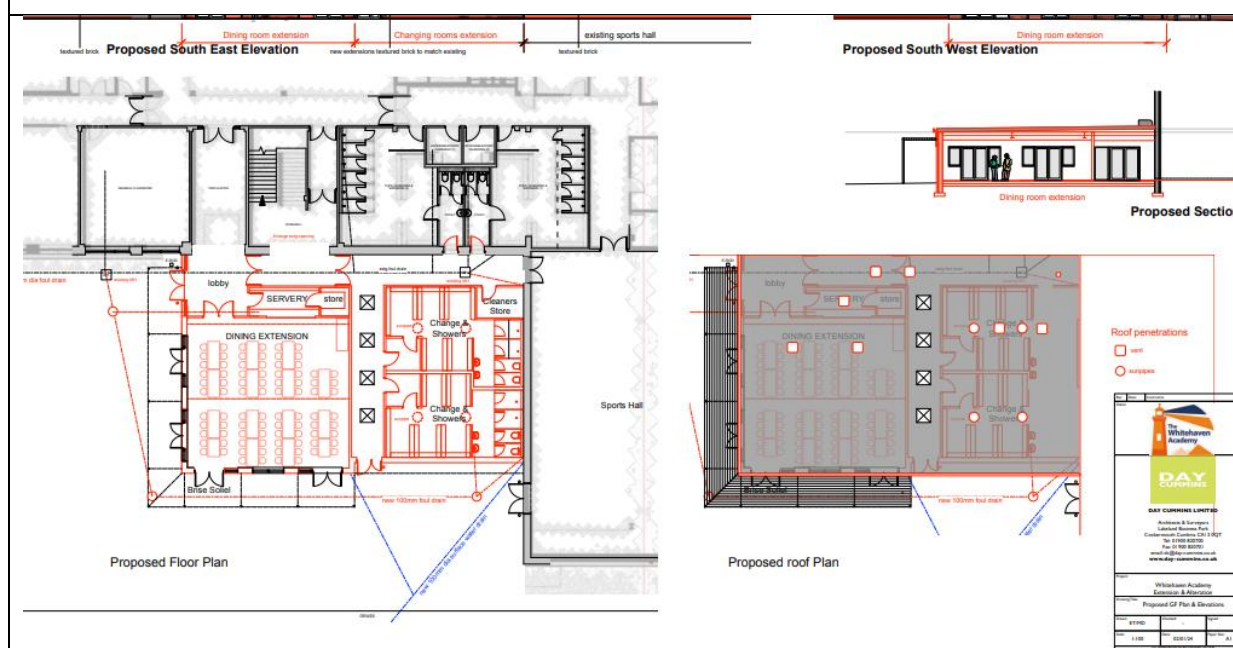
Thank you for consulting Sport England on the additional and updated information.

Sport England has provided comments on the previous documents in our representation of the 11 November 2025 (copy appended to this letter), where Sport England raised no objection to the proposal as it was considered to meet exception E2 and E3 of Sport England's Playing Fields Policy.

Sport England notes that the additional and updated information includes amendments to the layout of the changing block element of the proposal. The location of the dining extension and changing block have not altered since Sport England previously commented:



Above: Previous layout plan



Above: Current layout plan

The views of the National Governing Bodies for Sport

As part of the assessment of this current 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. They also provided comments in Sport England's previous representation

of the 11 November 2025.

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

- *The new amendments are compliant with FF guidance and align with the existing site plan.*
- *FF notes that an accessible WC does not appear on the submitted plans, and the school should ensure provision is made so that users have appropriate access where required.*

The comments of the England Cricket Board (ECB) have been summarised as:

- *No impact on cricket, therefore no change to comments and no objection*

The comments of Netball England (NE) have been summarised as:

- *No change in response*

Sport England's assessment of the planning condition

Sport England considers proposals for facilities that support a playing field 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.'

As can be seen from the comments of the Governing Bodies for Sport above, none of them have raised any comments about the proposal impacting on their sport or sport facilities.

Sport England notes that the proposal will be on an existing area of hard play and will be located within the corner formed by the existing buildings. Part of the proposal includes a dining room (which is not a sport facility), but this will not result in the loss of any playing field nor formal sport facility. This element of the proposal meets E3 of Sport England's Playing Fields Policy.

The FF have commented that the new amendments are compliant with FF guidance. Sport England welcomes the fact that the applicant has addressed the design matters previously raised.

However, the FF have also commented that an accessible WC does not appear on the submitted plans, and the school should ensure provision is made so that users have appropriate access where required.

As was set out in Sport England's previous representation, Sport England uses the planning system as an opportunity to enhance the design of sport facilities. Sport England would not wish to see the applicant go to the expense of erecting facilities, which due to their current design, may create problems for the club or result in additional costs to make further alterations after it is constructed. The current design may also impact upon the ability to seek grant funding, if it does not accord with design guidance (these comments are made without prejudice to any decision that a grant funding body may make).

Sport England would be grateful if a copy of our comments can be forwarded to the applicant so that they can consider amending the design and clarifying the issues the comments raised by the FF above.

Should the applicant require any further technical advice from the Governing Body, the contact is elizabeth.od@footballfoundation.org.uk

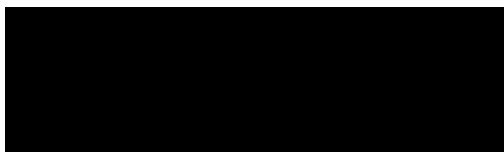
Notwithstanding the above, as the proposal does not negatively impact on the pitches and is an ancillary facility to support the use of the playing field, having assessed the application, Sport England is satisfied that the proposed development meets Exception E2 of our playing fields policy.

Sport England's position

Given the above, Sport England raises **no objection** to the amended plans because it is considered to accord Exception E2 and 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,



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

Appendix:

Sport England's representation of 11 November 2025.

Cumberland Council

By email only

Date: 11 November 2025

Dear Sir/Madam,

Application Reference: 4/25/2342/0F1

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

Proposal: Variation of condition 2 (plans) for variation in design of planning application 4/24/2149/0F1 proposed dining & changing room extension Whitehaven Academy

Sport England Reference: PA/25/NW/WAF/70574

Thank you for consulting Sport England on the above planning proposal.

The proposal is for a dining room and changing room extension and this is being sought by varying a planning condition on the planning application 4/24/2149/0F1.

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

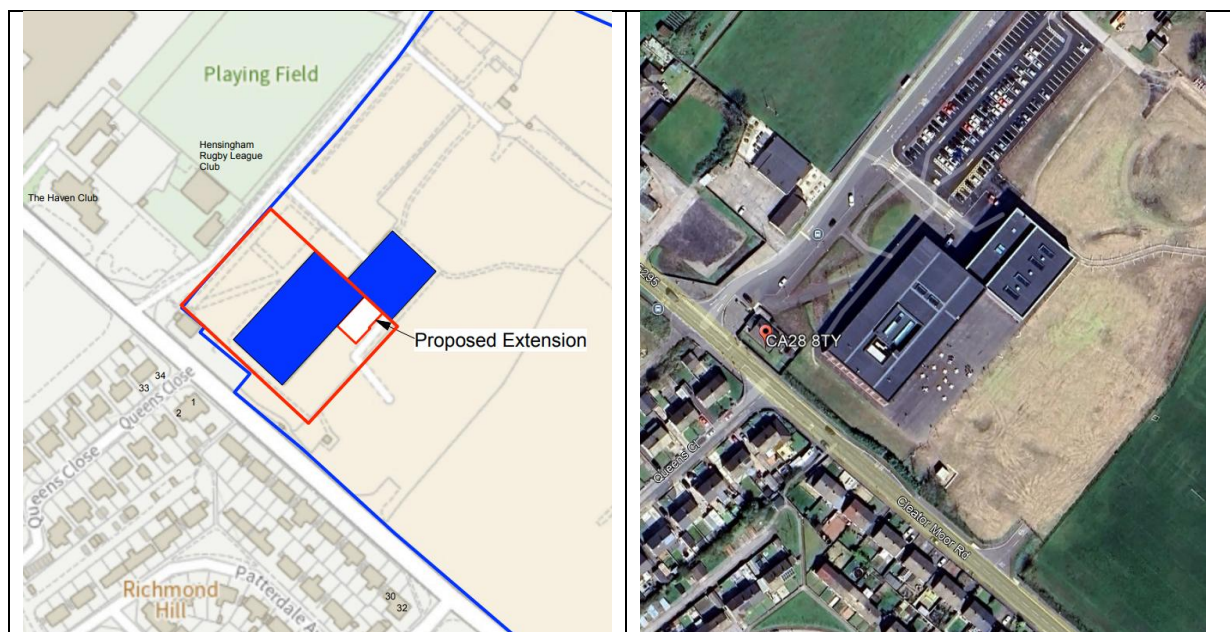
Sport England's policy is to oppose the granting of planning permission for any development which would lead to the loss of, or prejudice the use of:

- 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 a dining and changing room extension:



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

- *Whitehaven Academy has three grass pitches on site. However, the proposed extension is planned for the large tarmac playing area, with a substantial soft play area situated between the grass pitches and the proposed extension. Therefore, there would be no impact on the football provision on site.*
- *The changing rooms overall appear compliant with general guidance, with no welfare concerns regarding line of sight. However, FF raises questions around the potential for additional toilet provision as no new is proposed and only four existing are shown to service four changing rooms, and requests greater clarity on the placement of showers and the gap shown to the north of the diagram, as the room is titled changing and showers but no showerheads are shown, therefore compliance cannot be determined if showers are planned.*

- *If amendments are made, FF would expect any design changes regarding the showers to align with the existing site plan as they are compliant, i.e. cubicles. For any other improvements or changes, FF recommends referring to our changing room guidance available on the website.
<https://footballfoundation.org.uk/changing-pavilion-design-key-considerations>*
- *Overall, as this is an extension of an existing operating facility—and given the school's continued growth and success over the years—the added changing facilities will support football usage on site. The current proposal is largely acceptable, with some minor clarification requirements.*

The comments of the England Cricket Board (ECB) have been summarised as:

- *No impact on cricket*

The comments of the Lawn Tennis Association (LTA) have been summarised as:

- *The plans provided do not appear to affect the existing tennis provision*
- *In terms of changing room design guidance, we would typically advise organisations follow Sport England's planning guidance - [Clubhouses / Sport England](#)*
- *As an educational site, safeguarding considerations for changing room usage will need to be in place.*
- *We would recommend any safeguarding considerations in place during curriculum usage should also be applied during wider community usage of the facilities.*

The comments of Netball England (NE) have been summarised as:

- *The building does not impact on any netball courts*

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

- *The proposal doesn't appear to be directly built onto playing field used for Rugby League, however the loss of playground could result in more use of the grass pitches leading to deterioration in quality if this hasn't been factored into ongoing maintenance programmes.*

Sport England's assessment of the planning condition

Sport England considers proposals for facilities that support a playing field 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.'

As can be seen from the comments of the Governing Bodies for Sport above, none of them have raised any comments about the proposal impacting on their sport or sport facilities. The FF have commented that the facilities will support football usage on site.

Sport England notes that the proposal will be on an existing area of hard play and will be located within the corner formed by the existing buildings. Part of the proposal includes a dining room (which is not a sport facility), but this will not result in the loss of any playing field nor formal sport facility. This element of the proposal meets E3 of Sport England's Playing Fields Policy.

Some of the Governing Bodies have raised some design issues and matters of clarification in relation to the layout of the changing rooms and matters to consider such as the displaced playground use.

Sport England uses the planning system as an opportunity to enhance the design of sport facilities. Sport England would not wish to see the applicant go to the expense of erecting facilities, which due to their current design, may create problems for the club or result in additional costs to make further alterations after it is constructed. The current design may also impact upon the ability to seek grant funding, if it does not accord with design guidance (these comments are made without prejudice to any decision that a grant funding body may make).

Sport England would be grateful if a copy of our comments can be forwarded to the applicant so that they can consider amending the design in accordance with the comments raised by the Governing Bodies above.

Should the applicant require any further technical advice from the Governing Bodies, the contacts are:

richard.dixon@ecb.co.uk

laurie.haines@lta.org.uk

elizabeth.od@footballfoundation.org.uk

elizabeth.od@footballfoundation.org.uk

tom.little@rfl.co.uk

Notwithstanding the above, as the proposal does not negatively impact on the pitches and is an ancillary facility to support the use of the playing field, having assessed the application, Sport England is satisfied that the proposed development meets Exception E2 of our playing fields policy.

Sport England's position

Given the above, Sport England raises **no objection** to the application because it is considered to accord Exception E2 and 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,



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