

Kirklees Metropolitan Council

FAO: Elenya Jackson

By email

13th October 2026

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

Application Reference: 2026/62/92268/E

Site: Staincliffe Playing fields and cricket ground

Proposed Development: Use of land for siting of welfare cabin and erection of welfare cabin

Sport England Reference: PA/26/Y/KK/75219

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 HC7, and Sport England's Playing Fields Policy, which is presented within our 'Playing Fields Policy and Guidance Document': www.sportengland.org/playingfieldspolicy (summary of exceptions annexed to this letter)

The proposal and impact on playing field

This proposal relates to a small portion of land on the eastern side of an existing playing field that includes an existing rugby league pitch used by Batley ARLFC.

The proposed building is described as a welfare cabin and is described to be intended to include provision for toilets, washing, first aid facilities. The plans are insufficiently detailed to show how these facilities would be provided.

Assessment against the NPPF and Sport England's Playing Fields Policy

Sport England have consulted with the Rugby Football League (RFL) who have advised as follows:

- *The proposal appears to provide benefit to the usability of the site, providing changing space and toilets for users of the pitch at a site that doesn't currently have this. We are supportive of this principle as it removes barriers associated with participation and can facilitate more frequent participation in sport.*
- *The siting appears to be considerate to the use of the overall site, maximising an area which is currently unused and doesn't encroach on playing field currently used for matches or training. We would want to ensure there is no disruption to residents given the proximity to the site boundary.*
- *It is difficult to comment entirely on the suitability of the proposed provision as only limited detail is provided. It is anticipated the purpose of the window is for natural light but we would want to ensure this doesn't provide any direct sight into the changing room from outside. If more detail is provided we can comment on whether we would consider it acceptable, but this proposal wouldn't meet competition standards, however this is clearly designed to provide a service at a playing field rather than meet RFL competition requirements. Consideration may need to be given as to how access between male & female of the toilets/changing will be managed.*
- *Batley ARLFC has over 300 members with around 1/3rd of these being women and girls. Research shows that having adequate ancillary provision on site is a key contributing factor (or barrier) for girls when they are looking to play sport. Lack of suitable provision can contribute to non-continuation of participation.*
- *The club are active at a number of sites in the area, and this pitch at Staincliffe is crucial as they continue to grow and expand their activities and programmes in line with demand and growth. There are additional pitches around the cricket field which the club also has an agreement to use, so in theory these ancillary facilities could service the whole site rather than just the one pitch. Providing they are adequate to do so.*

Sport England notes the advice provided and has taken this into account in providing this response. The siting of the proposed building is considered to be acceptable as this will have an acceptable relationship to the existing pitch and would not compromise the capacity of the playing field to provide pitches.

We are unable to provide any detailed comments on the internal design and layout of the building as the submitted plan is insufficiently detailed to show the

proposed layout of any changing areas, showers, toilets etc. We concur with the comments made regarding privacy and safeguarding for users which could be impacted by the treatment of the window, and also when doors are opened due to the lack of privacy screens etc. We would encourage the Council to seek a more detailed floor plan and a further supporting statement to explain how the proposed internal layout of the building would serve users needs, and also to demonstrate how this would accord with relevant design guidance. Sport England's accessible design guidance can be found here: [Accessible and inclusive sports facilities | Sport England](#)

Having assessed the application, Sport England is satisfied that the proposed development meets exception 2 of our Playing Fields Policy and Guidance document, in that:

'The proposed development is for ancillary facilities supporting the principal use of the site as a playing field, and does not affect the quality of playing pitches or otherwise adversely affect their use'.

The proposed development is therefore considered to accord with paragraph HC7 of the NPPF.

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 HC7 of the NPPF.

If you would like any further information or advice, please the undersigned.

Yours sincerely,

Stuart Morgans

Principal Planning Manager, North Team

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