



# INDOOR SWIMMING POOL FOR BOURNE END JUNIOR SPORTS CLUB, NEW ROAD, BOURNE END, SL8 5BW

### **PLANNING STATEMENT**





Circulation:

M Storr BEJS

Academy Neil Bailey Sports

DPA



The Old Brewery Tap, 3 Shirburn Street, Watlington, Oxfordshire, OX49 58U

Tel: 01491 613 066 Email: mail@dparchitects.co.uk

#### **CONTENTS**

SECTION 1	INTRODUCTION
SECTION 2	DESIGN DEVELOPMENT AND ENGAGEMENT
SECTION 3	DESIGN PROPOSALS
SECTION 4	SUPPORTING TECHNICAL AND ENVIRONMENTAL INFORMATION
SECTION 5	APPLICATIONS HISTORY
SECTION 6	NPPF; PROFILE OF THE PROPOSALS WITH THE RESPECT TO PRINCIPLE GUIDANCE
SECTION 7	LOCATION, STRENGTHENING BOURNE END/WOOBURN GREEN WYCOMBE DISTRICT LOCAL PLAN (adopted Aug 2019)
SECTION 8	DESIGN AND PLACE MARKING
SECTION 9	COMMUNITY FACILITIES – LOSS OF EXISTING TENNIS COURT PARALLEL APPLICATION FOR MUGA; RELATIONSHIP WITH SCHOOL
SECTION 10	ENGINEERING: FRA,SuD's, WATER QUALITY AND SERVICES WDLP 2019 POLICIES DM38 AND DM39
SECTION 11	GREEN SPACE; GREEN INFRASTRUCTURE; LANDSCAPING
SECTION 12	ACCESS, PARKING AND TRAVEL
SECTION 13	PSYCHOLOGY AND SUSTAINABLE DEVELOPMENT

#### LIST OF FIGURES

1.	SITE LOCATION AND SETTING
2.	SELECTED AERIAL SITE VIEWS
3.	LOCATION OF NEARBY SWIMMING FACILITIES
4.	AERIAL VIEW OF SITE IDENTIFYING PROPOSALS AND SITE OF PROPOSED NEW MUGA
5.	BEJS/NEIL BAILEY IMAGES OF CURRENT SPORTS ACTIVITIES



Figure 1 – Site Location and Setting.

#### PART 1 PROPOSAL EXPLANATION

#### SECTION 1 INTRODUCTION

#### 1.1 Terms of Engagement

I am David Parker, until 2020 a full RIBA member, and ARB registered Architect working part time. Until 2016 I was the Principal Director of DP Architects with a 40 year career in; Local Government, directly in the construction industry, but since 1988 with my own Practice. Although specialising in housing, the Practice has extensive experience of non-residential development, including leisure, and typically I have managed planning policy issues except on major developments.

DP Architects were engaged by BEJSC in 2020 for the following purposes:

- To support the architects; Storr Architecture.
- To review the pre application results, draft proposals, and help ensure a joined up proposal.
- To prepare a supporting Planning Statement.
- To prepare a supporting Design and Access Statement.

#### 1.2 Introduction, scope, summary of proposal

- Bourne End Junior Sports Club has a history stretching back two generations, and has had a physical presence on the site since the original sports club building was constructed in the early 1980s.
- I am very struck by the level, spread and depth of commitment to the club, which is a charitable institution, by a large number of contributors over 50 years. There have been approximately 30,000 members over the 50 years the club has been in official existence. Over 100,000 hours of sport are undertaken by members each year over a wide range of disciplines including; badminton, football, climbing, netball, hockey, canoeing, judo, table tennis, gymnastics and swimming (the latter without direct control or access to a facility). Every year in excess of 20,000 volunteer hours of support are recorded.
- The proposal is to add to the existing sports club a new swimming pool building with support facilities consisting of a 6 lane 30 metre SPATA standard swimming pool, a 10 metre training pool, 4 sets of changing rooms and showers and support facilities with a mezzanine providing staff facilities, a kitchen snack bar and seating areas, together with a viewing gallery with accommodation for about 100 spectators, and all to full disabled standards and high environmental standards.



Figure 2 – Selected Aerial Site Views.

#### 1.3 Summary of Need: Justification for the proposal

- The ethos of BEJSC is "**sport for all**" and at present they are not able to achieve this due to lack of pool facilities. Sadly, around 60 children drown in lakes and rivers in the UK every year and in 2021 alone 4 young people have drowned in the stretch of river between Marlow and Cookham. The majority of these deaths are likely to have been preventable through providing training of the dangers posed and the life skills they would need if they found themselves in trouble.
- The facilities that are available in the area are not conveniently served by public transport from Bourne End making accessibility for quite a large cross section of the local community difficult at best.
- The nearest publicly available swimming facilities are at; Maidenhead, Windsor, Handy Cross and Henley Leisure Centre. There are private pools with some public access at David Lloyd Beaconsfield, and Alfriston School, Beaconsfield. Outside swimming is available at; Marlow Open Water Swim, Wycombe Rye Lido and Court Garden Leisure Complex but these provide very limited opportunities compared to the list of activities given below. (See Figure 4).
- The majority of members canvassed would use a swimming facility if it was provided onsite. The statement of community involvement provides compelling evidence of local need.
- Having "a state of the art" swimming and community facility with top class environmental properties widely available for local community use will promote healthy living and mental health (even more important in post COVID times); provide local business opportunities, and local employment.
- The secondary school is one of the only ones in the country without direct access to a pool for its students.

#### 1.4 Intended uses and users

- To provide club members with opportunities for different types of swimming all provided under one roof in a heavily supervised and environmentally friendly facility.
- To provide onsite swimming for school pupils.
- To provide swimming opportunities for local residents including socially driven single sex swimming sessions.
- To teach from beginners through to elite, competition swimmers (the club has a proven record of doing this in various sports disciplines).
- To hold swimming galas as a club.
- To provide practice sessions for the canoeing section in a safe environment.

#### **Users**

- The principal user would be BEJSC.
- There is already an embryonic programme of uses with allocated slots for school pupils on a year by year basis.
- Other slots would be made available to other community users, concentrating on local residents.
- It is intended to provide swimming opportunities for particular needs, concentrating on the young, but also for disabled and other special needs.

In order to secure the missing sponsorship finance to enable the project to be realised, this widespread use will have to be underwritten; consequently a suitably worded post-completion planning condition could be safely applied if necessary.

#### 1.5 Neil Bailey Swimming

The project is being sponsored by Neil Bailey Swimming, who have been teaching children to swim for over 8 years and successfully taught over 10,000 swimmers. Mostly associated with the club, Bourne End Swimming Club has been delivering lessons to the local community at Court Gardens swimming pool in Marlow. They have contacted 6 local schools in the area offering to help them save, build or upgrade pools and gained explicit contracts from all 6 (all with different outcomes), but the experience has born fruit with more recent outcomes.

The closure of Hollywell Mead Pool was reversed and is now the Wycombe Rye Lido; they have been involved in the High March school pool, helped Cedar Park school help raise money for their pool project and are now offering lessons in the small pool in Amersham Road in High Wycombe; and at Cherry Tree Farm swimming pool in Great Kingshill, and have aspirations to assist in other projects. There are also private pools at David Lloyd and Alfriston School in Beaconsfield.

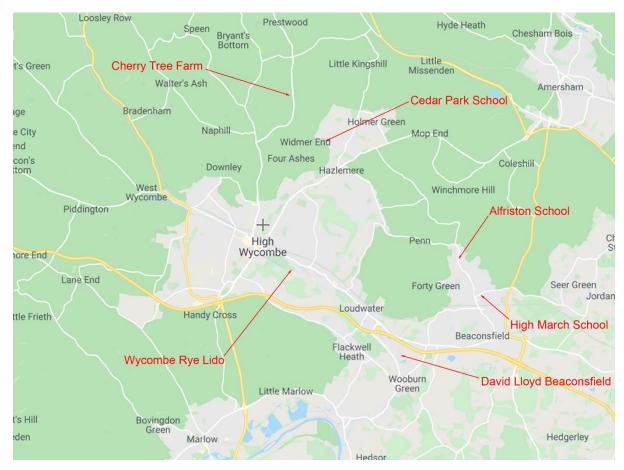


Figure 3 – Location of nearby swimming facilities.

#### SECTION 2 DESIGN DEVELOPMENT AND ENGAGEMENT 2.1 Preliminary Proposals

The pre-application drawings showed a more ambitious project which comprised; an 8 lane main pool, 4 lane training pool, with male and female changing and plant room completing the ground floor pool area; staff facilities, office and viewing gallery in a mezzanine. The front of building consisted of a new 6<sup>th</sup> form classroom block at 2 storeys, consisting of about a dozen separate classrooms of varying sizes on each level with a central lobby atrium, where the main entrance to the pool building is now proposed. This combined proposal was prepared in conjunction with the Academy, but is no longer part of the school plans, certainly for this site.

#### 2.2 Community Consultation Process

The club have managed community engagement and the process is set out in considerable detail by Matthew Todd, Chairman of BEJSC, in issue 02 of the Statement of Community Involvement.

Dec'21

The club started from a position of community strength, being an integral part of the sports provision within Bourne End, and with close links with the school, with whom they share a campus.

#### Consultation included:

- Production of a dedicated project website widely circulated and advertised.
- Facebook page
- Providing printed material upon request direct from the office@bejsc.co.uk
- Notices and advertisements in local magazines and businesses
- Press briefings and articles
- A leaflet drop around the site, including local residential streets potentially affected by parking up to Roman Way and Highfield Road
- A planning exhibition and evening with all the stakeholders invited held at the club on the 20<sup>th</sup> and 22<sup>nd</sup> October.

The fact that so few local residents and stakeholders thought it necessary to attend the planning evenings, the culmination of an unusually intense public engagement, is testimony to the fact that local residents consider they are well informed and are supportive of the proposals.

The statement provides a link to a summary of the feedback forms submitted of which 70 supported the proposals and only 5 opposed them, mainly on concerns of traffic safety and parking. Typical of the positive comments are:

Children need to be taught to swim. We live by a river! Would definitely support a swimming pool accessible to the local community.

This is a great opportunity to increase water safety skills in a riverside village where there has been recent tragedy in the water.

Proof of the Club's proactive approach is that they employed consultants to carry out a week long parking survey of the whole surrounding area on average, there is something like 80% spare capacity on weekdays.

#### 2.3 Pre-Application

- A formal pre-application was submitted on 05.03.20 leading to a meeting on 09.07.20 the outcomes for which were confirmed in a formal letter dated 29.09.20, accompanied by a pre-validation list and a planning matrix of the same date generated by the Case Officer, Sarah Armstrong.
- The responding letter indicated support in principle for the project, but listed 12 bullet points which would need to be addressed in order for unqualified officer support.
- These are all addressed in these proposals, with details in this statement or the DAS, but can be summarised broadly as identifying key issues.
  - 1. Impact of the proposal upon the designated green space.
  - 2. Evidence that the loss of the existing external tennis courts can be justified.
  - 3. That redevelopment would be constrained to the area currently occupied by the tennis court (and adjoining existing hard surfaced areas).
  - 4. The layout and design of the buildings meet acceptable design standards, and are sufficiently legible in terms of access and relationship with adjoining development.
  - 5. The proposals are justifiable in terms of parking provision.
  - 6. The proposals adequately meet the policies on biodiversity and ecology.
  - 7. The Public Realm will sufficiently protect the existing sylvan frontage.



Figure 4 – Aerial View of site identifying proposals and site of proposed new MUGA.



Figure 5 – BEJS/Neil Bailey images of current sports activities.

#### **SECTION 3 DESIGN PROPOSALS**

#### 3.1 Summary of changes from Pre-App to Detailed Proposals

- 1. The new classroom block has been omitted enabling the building to be reduced in size from approximately 75 x 45m to 54 x 45m.
- 2. This has addressed the legibility issue, with the pool now presenting a front entrance and approach to the Public Realm.
- 3. The Academy and Sports England support the loss of the 4 tennis courts and the proposals demonstrate a net gain in community facilities justifying their loss. Nevertheless, in a separate but parallel application the school are applying for a 3 tennis court MUGA on open land within the schools control, known as the chicken field and identified in figure 5.
- 4. Substantial work on surveying current and predicted travel to the facility demonstrates not only an adequate parking provision for the proposed use, but implicitly a reduction in car use accessing other local swimming pools, and that the proposal is certain to generate a reduction in car dependency associated with its use.
- 5. The frontage sylvan appearance including the bank of trees and hedges to the front will be conserved.
- 6. Implementation of the proposed ecological and landscaping proposals, which can be secured by pre-commencement condition, will ensure compliance with ecological and biodiversity policies.
- 7. The application is supported by a raft of consultants reports which cumulatively demonstrate compliance with policy requirements, or sufficient information to control them adequately by condition.

#### 3.2 Full List of Drawings

#### **Drawings**

DPA	Site Location and Context Plan	21 BEJS SL01	
MWSC Itd	Survey	0821-16-01	
Storr Arch	Extg Site Plan	501	
Storr Arch	Proposed site plan	502-A	
Storr Arch	Proposed Ground Floor plan	100	
Storr Arch	Proposed Mezzanine Floor plan	101	
Storr Arch	Proposed Elevations	300	
Storr Arch	Proposed Generic Section	301	
Storr Arch	South East Elevation Artists Impression		
Storr Arch	South West Elevation Artists Impression		

#### SECTION 4 SUPPORTING TECHNICAL AND ENVIRONMENTAL INFORMATION

	Subject	Agent	Document	Issue/ Date
1	Community Engagement	BEJSC office@bejsc.co.uk	Statement of Community Involvement	(02) Dec'21
2	Access and Parking	Lime Transport	Transport Statement	(01) Dec'21
		helen@limetransport.c om	Draft Travel Plan	(01) Dec'21
		Inc. Phoenix Traffic surveys	Local Parking Survey	
3	Trees	Norton & Associates Ltd mail@norton- associates.co.uk	Arboricultural Report	(01) Feb'21
4	Geo Technical	Impact Geotechnical Ltd via Norton & Associates	Ground Investigation Logs/Locations BGS Geo Report	(01) Jul'21
5	SuD's/FRA	Lanes Professional Services	Flood Risk Assessment	(Rev 0) May'21
6	Ecology	Norton & Associates Ltd mail@norton- associates.co.uk	Preliminary Ecological Assessment Net Gain Calculation	(01)Dec'20
				(01) Aug'21
7	Green Roof Green space /Infrastructure Landscaping	Bauder WB Manufacturer's information DISCUSS	Wildflower blanket system	Nov'21
				ТВА
			Greenspace & Landscape	
			Strategy Proposals	
8	Energy	Therm Energy	Energy Statement	(01) Sep'21

#### SECTION 5 APPLICATIONS HISTORY

1980 (record not

BEJSC immediate site and playing fields behind

Installation of solar PV system to roof 11/07949/FUL 13/07010/CONCC Retention of classroom Implemented 98/07416/CONCC Running track, all weather pitch etc 95/05638/FUL 2 Storey extension to sports club Implemented

(to north gable; storage, multi-sports/clubrooms,

Implemented

Implemented

and additional parking)

93/06841/OUT Outline application for above Implemented Implemented 89/06701/VCDN Extension to hours of use Implemented 95/06140/CONCC Construction of new tennis courts (reduced from 4 to 3) for Wye Valley School CC/43/95 Implemented Construction of 4th tennis court Implemented CC/56/95

BCC granted permission for the erection of the

existing sports club building. online)

There is no other directly relevant history recorded online.

#### **SECTION 6** NPPF; PROFILE OF THE PROPOSALS WITH THE RESPECT TO PRINCIPLE GUIDANCE

6.1 There is a presumption in favour of a sustainable development (para10). The proposals fit well with the overarching objectives - to support strong vibrant healthy communities; to protect natural built and historic environment including making effective use of land; and the provision of sports facilities helps promote strong responsive and competitive economy (para 8).

> The proposal promotes healthy and safe communities (chapter 8) by promoting social interaction (para 92) safe and accessible; and enabling supporting healthy lifestyles e.g. .... through the provision of sports facilities (para 92).

> Decisions should plan positively for the use of shared spaces and community facilities (para 93), and take into account improving health, social and cultural wellbeing for all sections of the community.

#### **NEIGHBOURHOOD PLAN**

6.2 The 5<sup>th</sup> draft version of the Neighbourhood Plan has been sent to Buckinghamshire County Council for review following inclusion of the Holland Park proposals. It has just commenced a further period of Public Consultation to be completed early 2022 after which it will go to Public Referendum for formal adoption; until then it has limited weight.

> However draft policy WBE/PD3 requires good quality design, and other policies refer back to Wycombe policies emphasising the protection of the greenbelt; policy WBE/PD6 refers to BCC latest parking guidance for zone C; policy WBE/PD11 requires adequate ingress and egress with sufficient parking, drop off zones and an explanation of expected peak vehicle movements; policy WBE/E1 reinforces the need to minimise carbon emissions and promoting bio-diversity.

> Policy WBE/A3 seeks the safeguarding of green spaces (A4/A5 also apply).

There are no specific draft policies relating to swimming pool provision, or BEJSC in particular.

# SECTION 7 LOCATION, STRENGTHENING BOURNE END/WOOBURN GREEN WYCOMBE DISTRICT LOCAL PLAN (adopted Aug 2019)

- 7.1 CP2 and CP3 direct development into existing urban centres where there is a high degree of interconnectivity; Bourne End is Tier 2 (C) settlement where in the provision of community and sport facilities is encouraged.
- Furthermore, Bourne End has been identified as an area for housing growth (CP4;5.4).
- 7.3 CP7 supports (2f) further infrastructure growth in Bourne End and (g) seeks more sustainable travel to reduce car dependants and (h) improved walking and cycling provision.
- 7.4 Section 3 seeks the provision of new and improved community facilities to promote healthy living, sports, and expansion of secondary schools (particularly in Bourne End).
- 7.5 CP12 supports the integration of renewable technologies, and the location of facilities where they are provided and minimise the need to travel (by car).

The location of this proposal therefore, is positively supported by Policy, and provide a much needed swimming facility much needed locally with proven demand.

Alternative locations for this facility were considered in detail (see DAS section 4).

7.6 CORE STRATEGY (2008) has limited direct relevance but these proposals comply generally with Sections 3.0; 4.0 and 5.4.

#### **SECTION 8 DESIGN AND PLACE MARKING**

8.1 CP7, CP9

The proposal needs to achieve a high quality of design which will contribute positively to place making, and improving the character of the area and the way it functions. It will make the best use of land which it is established is previously developed.

8.2 DM35, DM37: the proposal provides a comprehensive approach to site layout with a robust and legible structure of public realm with the direct approach to an attractive entrance with a route that will be reinforced by suitable signage, the legitimate criticism of the pre-application proposals are fully addressed.

Necessarily large to meet the swimming Brief, the scale of the development fits the context of the school campus in terms of its scale, height and massing, and demonstrates an attractive high quality design by use of simple form and appropriate materials.

- 8.3 All internal spaces have been sized to meet the minimum space requirements apposite for their use as advised by Neil Bailey Swimming and Sports England.
- 8.4 The Development and Site Allocation Plan 2013, reiterates the presumption in favour of sustainable development (DM1) and promotes the use of walking, cycling and the use of travel plans (DM2) which the considerable work undertaken by BEJSC and Lime Transport demonstrates how travel by car reliance and parking loading will be substantially reduced.
- The proposals meet every criteria set out in DM35; 3(a)2(i) inclusive.
- DM36 and DM37 have limited relevance other than a requirement to achieve a high quality in the detail of the design (1a).

# SECTION 9 COMMUNITY FACILITIES – LOSS OF EXISTING TENNIS COURT PARALLEL APPLICATION FOR MUGA; RELATIONSHIP WITH SCHOOL

- 9.1 Policy DM29 (2) states: land or buildings currently or last occupied for community use must be retained unless the applicant has clearly demonstrated through an exhaustive needs assessment that the land and/or buildings proposed to be lost are surplus to any community needs.
- 9.2 At pre-application, the Case Officer emphasised this issue needs to be addressed in the application. At the time, the courts used by the tennis club had ceased and the courts were in poor repair. Some limited refurbishment since has enabled limited re-use by the school, however.
- 9.3 It is recognised their loss needs to be justified under the terms of the Policy, and we submit this is the case for the following reasons.

BEJSC has just consulted Sports England and they have replied. A full transcript of the consultative e-mail is available on request but sets out in full the overall proposal and the parallel but separate 3 court MUGA facility application.

9.4 Sports England's full reply in September is included as Appendix 1 but its conclusion is stated

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 (tennis courts).

- 9.5 The school academy has been fully consulted and is supportive of this proposal, and it is agreed that they will make a separate planning application for a 3 tennis court MUGA on land behind the school identified as "the chicken field" and highlighted on Figure 4.
- 9.6 The academy have provided a letter of support for this application, specifically referring to the loss of the tennis courts, and that the addition sports benefit of the pool's provision outweighs ON ITS OWN, the loss of the 4 existing tennis courts, so it is submitted that the acceptability of this

proposal does not depend absolutely on the provision of the MUGA, which is outside the control of BEJSC to deliver.

## SECTION 10 ENGINEERING: FRA, SuD's, WATER QUALITY AND SERVICES WDLP 2019 POLICIES DM38 AND DM39

Norton Associates have overseen a geotechnical investigation by Impact Geotechnical Limited, leading to a flood risk assessment and drainage services proposal report prepared by Lanes Professional Services.

#### 10.2 Water Quality

The site is situated on aqua-lewses nodular chalk formation. The FRA demonstrates that ground water and surface water is adequately protected, taking into account the lowered ground levels to provide the swimming pool.

- 10.3 FRA and SuDS. Lane Professional Services have prepared a SuDS Strategy Report and drawing based on the geotechnical investigation (their full report includes the bore hole results analysis) and these demonstrate that:
  - The site is located in Flood Plain 1 and is not considered vulnerable with regard to pluvial flooding.
  - The sustainable drainage proposals demonstrate a detailed design will
    ensure that there will be no increased risk of fluvial or pluvial flooding
    from the proposals, and that the SuDS design will ensure that there will
    be no increased risk of flood water penetrating beyond the proposal site
    development site boundary.
  - The proposals allow for the impact of climate change and current flood risk guidance, and that the imposition of a suitable pre commencement condition will allow a fully developed design to be agreed before the development is implemented.

#### 10.4 Foul Drainage

The site is adequately served by an existing foul sewerage infrastructure which can accommodate the increased development, and the Lanes' report outlines where the connections are to be made and confirms there is adequate capacity.

# SECTION 11 GREEN SPACE; GREEN INFRASTRUCTURE; LANDSCAPING Policies CP2, CP8, DM42 WDLP(ORG 2019) DM11, DM12, DM16

#### **Adopted Delivery and Site Allocations Plan July 2013**

11.1 Possible alternative locations: this site was selected as the only practical location, after an extensive review of alternative sites, as set out in full in Chapter 4 of the accompanying DAS

#### 11.2 Green Belt

The pre application has established that no further information is required with respect to impact on Green Belt.

# 11.3 Green Spaces, Green Infrastructure: DM11, 12, and 16 cover green networks and infrastructure; green spaces, and open space and new development

6.61 sets out the importance of maintaining green networks and infrastructure and Figure 11 identifies the sports field and south-eastern boundary as existing green infrastructure abutting the River Wye green corridor opportunity area.

DM12 states: where, in exceptional circumstances, it can be demonstrated that development with inner green spaces a substantial element of green space must be retained and the overall character and quality of the space is maintained, or if this is not possible, alternative provisions of equivalent quality should be made within a reasonable distance.

The pre application established that, although the development will have an impact upon the retained green space, the whole of the development will be constrained in previously developed land; in effect the tennis courts will become the pool hall building, and there will be no extension of hard paved areas into the green open space.

#### 11.5 Sports Field Use:

In effect, up to the south-eastern boundary which is well tree'd and planted, and is part of the green infrastructure, the whole of the land is already manicured and in sports use. There is no implied or explicit change to the use or character of this land inherent in these proposals, and the green infrastructure along the Wye valley is not affected.

### The proposals therefore comply with the requirements set out in the pre application response.

#### 11.7 Biodiversity and Landscaping

The submitted plans demonstrate that additional planting is to be introduced to the site, and while a fully detailed landscaping proposal is not part of the application, this could be controlled by a condition.

Norton and Associates have prepared a preliminary ecological assessment including a net gain calculation.

The proposal to use a wild flower blanket system on the curving roof of the pool hall will in effect, substantially increase the biodiversity compared to the existing hard paved tennis courts.

#### SECTION 12 ACCESS, PARKING AND TRAVEL

Lime Transportation Statement (December 2021) sets out a full analysis of the access, traffic safety, vehicle circulation within the site, swept path analysis for service vehicles and coaches, and parking. Read in conjunction with the application drawings, this demonstrates that there will be a surplus of parking spaces provided against anticipated demand.

#### 12.2 Methods of Access:

BEJSC extensively consulted the local community (Statement of Community Involvement) and this has established that half the anticipated users will be travelling less then 1 kilometre to site. Journey mode split (Table 2.1) demonstrates only a third of users will arrive by car with the majority walking and significant numbers using public transport or being dropped off by car. This site specific data establishes a sustainability quotient superior to that predicted by TRICS, and emphasises the very local community use, including use by the school.

- The additional 29 car spaces proposed is more than adequate for normal use.
- On gala days or special occasions, the school will make available additional parking facilities in their court identified on the existing site plan as "playground" and in the Transport Statement and on the site location plan, which also demonstrates that coaches on these occasions can be accommodated and turned on site as required.
- Given the school environment, it is important that the internal vehicle circulation is clearly legible, and safe. The proposals will be clearly demarcated on site with surface markings and signage with sign speed limits of 10 mph. The Transport Statement includes Swept Path Analysis for appropriate vehicles demonstrating compliance.

#### 12.6 Travel Plan

This gives full details of accessibility by public transport (2.4), and audits site travel characteristics (3.2). A full strategy is set out together with proposed implementation programme and recommends the identification of a senior manager to take a leading role in the implementation of the plan. Reasonable compliance with this can be delivered by the imposition of a suitably worded post completion planning condition.

## SECTION 13 ECOLOGY AND SUSTAINABLE DEVELOPMENT DM13, DM14, WDPLP (adopted org 2019)

- The existing site consists of hard surfaced tennis courts, and has a negligible ecological profile. It is acknowledged that some enhancement nevertheless needs to be demonstrated, and now is set out in Norton and Associates Preliminary Ecological Assessment which can be read in conjunction with the accompanying application plans.
- The energy loading of the heated swimming pool is significant. The application is accompanied by an energy statement prepared by Therm Energy, and the proposals include renewables. The existing commitment to on site renewable energy sourcing is demonstrated by the provision of an extensive solar PV, and this will be used to feed into the energy loading of the new pool building, included will be an extended array utilising the unused south facing roof area identified on the aerial images.

Furthermore, it is proposed that the highest practical standards of thermal insulation and energy recirculation will be included in the detailed provision once permission is granted and work can start on detailed design and delivery – this could be controlled by suitably worded pre commencement condition if necessary.

#### SECTION 14 Weighing and Balancing of Issue

This is signposted in the planning matrix provided by the Case Officer (item 20), and must be done by the Application Case Officer.

We submit these proposals adequately address the 7 identified issues set out in Section 2.3 above. A summary of the balancing justification is set out at the end of the DAS.

David Parker

DAVID PARKER (ARB) CONSULTANT For DP Architects

#### APPENDIX 1

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.

Dear Matthew.

Thank you for consulting Sport England on the pre-application proposal for a new swimming pool.

#### Sport England –Statutory Role and Policy

The site is considered to constitute playing field, or land last used as playing field, therefore Sport England advises that this proposal would require statutory consultation, under the terms of the Town and Country Planning (Development Management Procedure) (England) Order 2015, at the formal planning application stage.

Sport England considers proposals affecting playing fields in light of the National Planning Policy Framework (NPPF) (in particular Para. 97) and against its own playing fields policy, which states:

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

- all or any part of a playing field, or
- land which has been used as a playing field and 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.'

#### Sport England Policy Exceptions

- 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.
- 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.
- E3 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.

- 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.
- E5 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.

Sport England's Playing Fields Policy and Guidance document can be viewed via the below link:

https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing\_fields\_policy

#### **Assessment against Sport England Policy**

The proposed swimming pool will result in the loss of the 4no. hard surface courts marked out for tennis. It appears that the courts are fenced but not floodlit. Reference is made to the courts not being in use. Can confirmation be provided that there is no wider community use of these courts? Sport England will consult the LTA at application stage to understand their views re: the proposed loss of provision. So it would be good to cover this off at an early stage.

Sport England would expect that the regard is had to our and the relevant governing body's (Swim England) technical design guidance on swimming pools. More information can be found here: <a href="https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/swimming-pools">https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/swimming-pools</a>.

Sport England notes that significant work has been undertaken on developing the programme of use for the proposed pool.

Sport England is likely to support the proposal under our E5 exception policy:

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.

If you require any further information please do not hesitate to contact the undersigned.

Yours sincerely,

#### **Owen Neal**

Planning Manager