

Planning Services  
EHDC  
Penns Place  
PETERSFIELD  
Hants GU31 4EX

15<sup>th</sup> November 2017

Dear Sirs,

**New Sports Centre Reserved Matters Application. Ref: 21068/041**  
**Alton Society Comments**

Much of the public comment surrounding this application has been in relation to the facilities mix in what is proposed, and the perceived inadequacies for the users and stakeholders, and these are not matters in which we feel it is appropriate for us to comment on in detail. However, when taken together, they do reflect a serious deficiency in provision, especially when considering the relevant local planning policies (see below). A major factor has been the lack of any meaningful consultation with sports centre users - or their representatives – despite this being the expressed intention in the officer's report at the time of the outline application in 2015:

*“...objections to the proposal have been received from third parties relating to the precise details of the facilities to be incorporated into the replacement building..... Full details of the facilities provided would be set out within the reserved matters application, following consultation with interested parties”.*

It is equally clear that the facilities proposed are more characteristic of a private health club, to be run as a profitable business enterprise, rather than a council-developed community-led sports centre enjoying the benefit of public subsidy. The impact of this is self-evident, and in our view represents a serious under-provision of competitive sport facilities, when set against the express requirements of local planning policy. This under-provision becomes particularly acute when taking into account the significant population growth expected in Alton and the surrounding area over the medium/long term.

Specifically:

1. Planning Policy:

a. Joint Core Strategy (JCS) Policy CP17 states that:

*“Development that results in the loss of a sport, recreation or play facility will only be permitted where it can be demonstrated that....alternative facilities of equal or better quality and quantity can be provided in an equally accessible location”;*

b. JCS Policy CP18 states that:

*“Improvements will be made to enhance recreation, play, sports and built facilities within communities and throughout the district”;*

c. Alton's Neighbourhood Plan (Policy CH2) very specifically proposes that:

*“a replacement sports centre facility providing an enhanced level of recreational provision to Alton in terms of quality and quantity on or adjacent to the current site will be supported ...”.*

This ANP policy was established in clear recognition of the 25% population growth anticipated for Alton over the 13 years (now widely regarded as a serious underestimate).

Neither the scale nor facilities mix of what is proposed will comply with these policies. Nor does there appear to be any regard in this application for satisfying the needs of Alton and the surrounding area, a serious omission in view of the wide dependency on Alton's sports provision amongst the surrounding villages. (Curiously, the Sustainability Statement states it will "...offer a sustainable sports centre for Alton Town Centre..."!) Also, it is important to note that such public amenity space has to be available for use by many of the surrounding schools. It is well known that local schools are already having to travel to other areas to gain access to the right facilities.

2. Layout. The ground floor layout (A-PL-006) confirms the impression of a commercial health club, rather than a competitive sports facility:
  - a. A steam room and sauna both appear a long way from the swimming pool, which seems totally illogical. Instead, they form an integral part of a huge 'Spa' facility: a hydra pool, 4 treatment rooms, a large 'relax' area, 'holistic studio', and ....a nail bar.
  - b. Against this, the apparent absence of any crèche facility is a serious omission.
  - c. There also seems to be an excessive amount of space dedicated to cafes and lounge areas.

Importantly, the spa was expressed as 'desirable' (not 'essential') in the Design Brief (DAS section 5), but nevertheless occupies a significant portion (nearly 20%) of the ground floor.

3. Energy. There appears to be no serious consideration of renewable or self-sufficiency in energy generation. This seems an appalling omission, and a wasted opportunity to show how the District's public buildings can set the pace in modern energy provision. Not only does it ignore the JCS's Core Principles (CP24), it runs counter to the aspirations of the district's own Energy Strategy, which clearly sets out its vision for the future:

*"EHDC will drive down carbon emissions across the district", and  
"EHDC will position itself in the vanguard of developments in the energy sector".*

Here we have a major development ultimately under the district council's control, and thus representing a unique opportunity to incorporate innovative technology, such as co-generation, bio-mass, ground-source energy, and/or solar roofing, in a way that could exploit the possibilities for real self-sufficiency, and the significant savings in running costs that would ensue, especially with regard to the swimming pool.

There is simply a passing reference to the fact that an "*option to include roof mounted photovoltaics is currently under review...*". At the very least, any decision to approve these or any subsequent plans should have PV roof panels written in as a mandatory condition.



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4. Impact on Cardiac Rehab Centre. The plans represent a serious encroachment on the existing curtilage of the REHAB centre next door. Not only does the proximity of the new building (less than 3 metres away) mean a significant loss of parking space, it would result in a very poor turning area, causing ambulances, mini-buses, etc considerable difficulty. For this reason we consider a reworking of the overall layout essential, especially with regard to the north-eastern corner of the building.
  
5. Car parking. The plans indicate there is no contingency plan to address the shortfall of spaces during building work (ref: Contractor Phasing Plans). These appear to suggest an estimated loss of 50+ spaces. This clearly needs to be addressed before any approval is granted, given the difficulties with parking that already exist.

In summary, these proposals fall well short of meeting the needs of Alton and its catchment area, both now and (critically) over the estimated 40 year life-span of the building. Since the contract with EA/SLM appears to have a 20 year term, we would also question any prospect for enlargement of the facility at the end of this period, given this 40 year lifespan. In any event, whatever the contractual arrangements, the overwhelming priority must be to get the right sports centre for Alton and the needs of its rapidly growing population. These proposals categorically fail to achieve this.

We therefore urge you to reject these plans in their current form.

Yours sincerely,

R W T Eckles  
Chairman – Built Environment Group

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