From: Roy Warren

Sent: 30 June 2022 14:13

To: Section 62A Applications <section62a@planninginspectorate.gov.uk>

Subject: Application Ref: S62A/22/0000002 - Former Friends School, Mount Pleasant Road, Saffron

Walden, CB11 3EB

Dear Sir/Madam

Application Ref: S62A/22/0000002 - Former Friends School, Mount Pleasant Road, Saffron Walden, CB11 3EB (Sport England Ref: PA/22/E/UT/61571)

Thank you for consulting Sport England on the additional information and plans that have been submitted by the applicant in relation to the above Section 62A planning application. I would wish to make the following comments on the 'Sports Facilities Note in Response to Sport England Comments' document that has been submitted which has been prepared as a response to the comments set out in our original formal response to the consultation dated 24th May 2022:

Paragraphs 2-5: Impact on Playing Fields and Sports Hall (Gym)

The applicant acknowledges the loss of the sports hall (referred to as the gym), the incursion onto the playing field and the loss of the ancillary facilities that support the use of the playing field (such as the changing pavilion and parking). However, the applicant reiterates that these impacts must be weighed in the planning balance and considered against the benefits of the proposal. Our position on the impacts of the proposal on the playing field has been set out in our original response. The weight to be attached to these impacts in relation to the benefits of the overall development proposal that have been asserted by the applicant is a matter for the Planning Inspector to consider.

Reference is made to the proposed swimming pool car park and access road only making a slight incursion onto the playing field. While it is acknowledged that the area that would be lost to the car park and access road would not be substantial in terms of size in the context of the size of the whole playing field, as set out in our original response, if implemented as proposed, it would no longer be possible to reinstate the cricket pitch as the outfield area to the north west of the cricket square would be substantially lost and this is the only part of the playing field that would be large enough to accommodate a cricket square and its associated outfield so it would not be possible to reinstate the cricket square elsewhere on the school's playing fields. As set out in our original response while refurbishing and reopening the swimming pool would be welcomed if considered in isolation, it would not offer benefits that in our view would outweigh the detriment of the overall proposal on the playing field. Limited weight should therefore be given to the applicant's reference to our non-statutory positive comments on the swimming pool re-opening proposals as they have been referenced out of context to our position as a statutory consultee on the application which has clearly stated that addressing the concerns raised about the swimming pool proposals would not address Sport England's objection as a statutory consultee.

Paragraphs 10-13: Swimming Pool Viability and Feasibility

Paragraph 10 refers to £558,274 being allocated to refurbish the swimming pool and provide new changing rooms to facilitate bringing the swimming pool back into use. The proposal to make a significant investment to facilitate re-opening the swimming pool is welcomed in principle. However, as the Financial Viability Assessment has not been made publicly available and no supporting conditions survey has been provided it is not possible to make informed comments on the scope of the refurbishment and whether the works would be

appropriate in response to the issues identified in any conditions survey that was prepared to inform the refurbishment costs. Without this information being provided there would be no certainty offered that the funding that has been allocated would be sufficient for delivering the refurbishment in practice. If the applicant could provide the conditions survey and the associated estimated costings for implementing the works, advice could then be provided on whether the proposed refurbishment works would be sufficient and appropriate for refurbishing the pool in practice. If weight is to be given to the reopening of the swimming pool in the planning balance, the Inspector would be advised to ensure that the refurbishment is implemented in accordance with a refurbishment specification (based on the recommendations in a condition survey) in order to ensure that certainty is offered that an appropriate refurbishment can be delivered in practice. In isolation, the applicant's confirmation that a significant sum has been allocated towards the refurbishment is not considered to offer the required certainty that this will ensure that a suitable refurbishment will be implemented in practice that will facilitate the reopening of the swimming pool.

No further information has been provided on the operational feasibility of the swimming pool in response to comments made in our original response. Swim England has advised that they still do not have enough detail to provide informed advice on the sustainability of the facility in the absence of an independent feasibility study including a business plan. The proposal to substantially fund the running costs of the swimming pool through the use of a service charge made on residents of the development would be welcomed in principle if this would cover the running costs and ensure the sustainability of the facility. However, it is unclear whether the schedule of running costs has been based on specialist advice and whether it has accounted for the recent significant increase in the costs of some of the pool services such as energy and chemicals. I have consulted Swim England who has advised that that the estimated running costs are extremely low and they would expect current energy costs alone to amount to the total annual estimated running costs of £57,000. Furthermore, the costs focus on the maintenance of the pool and have omitted some of the significant operational costs that have to be accounted for in practice especially the staffing of the pool which is usually by the far the largest single cost of running a swimming pool that would be available to the public. The budget also excludes administration and marketing costs. If all of these factors are accounted for it is likely to significantly increase the running costs and it may not be sustainable to justify increasing the residents service charge accordingly to cover all of these costs over a long term period. To allow informed advice to be provided to the Inspector on the operational feasibility of the swimming pool as set out in our original response, a feasibility study prepared by a specialist should be prepared which should be accompanied by an options appraisal of the management options for operating a pool and a schedule of estimated running costs prepared by a specialist. This is recommended to help demonstrate that the reopening of the pool would be a deliverable and sustainable benefit in practice.

In conclusion I can confirm that our position on the planning application as a statutory consultee and as a non-statutory consultee remains as set out in original response i.e. an **objection** is made.

If you would like any further information or advice please contact me.

Yours faithfully

Roy Warren

Planning Manager

