Press statement

**Statement in response to WinACC’s concerns about the carbon footprint and transport implications of the proposed Sport & Leisure Centre.**

Our response:

Cllr Lisa Griffiths, Chair of Leisure Centre Cabinet said:

“We are deeply disappointed in WinACC’s response to the planning application. WinACC has been a key participant in our Sustainability and Green Issues panel for this project and were represented by their Executive Director and a Sustainability Expert. They have had many opportunities to raise these issues but failed to do so.

The Council are fully committed to reducing its carbon footprint and the design and supporting information submitted with the Sport and Leisure Park planning application wholly reflects this.

The new Sport & Leisure Centre is a completely different facility to the existing facility at River Park and so can not be directly compared in terms of its impact on the environment. However, energy usage per square metre per annum will be significantly better (by around 27% based upon our current energy performance modelling work compared to current usage at the existing centre) .

In addition by using a passive design and building in energy efficiency measures our strategy aims to achieve a 16.8% reduction in CO2 emissions beyond the Building Regulations, an EPC(A) rating and a BREEAM rating target of ‘Very Good to ‘Excellent’.

We strongly dispute that the proposals are not within the National Planning Policy Framework and are confident that the package of measures to be delivered will provide an excellent choice of sustainable transport options. We have committed to providing cyclist and pedestrian enhancements, new crossing facilities and new street lighting and these measures will be supported by a travel plan.

The Traffic Impact Assessment and the supporting work including the Air Quality Assessment and Pedestrian/Cycle Street Audits have all been completed in accordance with Government guidance and have been undertaken in consultation with Hampshire County Council as the Highway and Transport Authority.

This is an ongoing process; we are still listening and developing the proposals and assessments where we can We are working alongside the County Council on the Winchester Movement and Access Study and opportunities that this may generate include potential future improvements to the park and ride bus services.

The planning determination process will consider all comments received together with the supporting statements on transport and sustainability.

**Notes**

**We have addressed each item in detail below point by point.**

WinACC’s statement’s are in red.

1. There has been a failure to have regard to a key WCC policy document (Twelve Actions for a Lower Carbon Council) concerning the carbon footprint of the development of the Winchester Sport and Leisure Centre.

**Our response**

* The design and supporting information submitted with the Sport & Leisure Park planning application reflects the Council’s desire to reduce its carbon footprint. The new Sport & Leisure Centre has been designed to be energy efficient and is assessed against the BREEAM Standard.
* The building incorporates solar panels on the roof, a Combined Heat and Power system and has an EPC A rating which means it has been designed to be very energy efficient.
* The approach to the energy strategy for the proposed development has been to achieve reduction in CO2 emissions via passive design and energy efficiency measures in the first instance prior to the consideration of low and / or zero carbon technologies (LZC).
* It is anticipated that the proposed development will achieve up to a 5.4% reduction in CO2 emissions beyond the Building Regulations Part L 2013 ‘baseline’ via passive design and energy efficiency measures.
* Through the use of on-site gas-fired Combined Heat and Power (CHP) to supply heat to the swimming pools, it is anticipated that a further 9.1% reduction in regulated CO2 emissions can be achieved beyond the Building Regulations Part L 2013 ‘baseline’.
* Additionally, through the implementation of an on-site PV array, it is anticipated that a further reduction in CO2 emissions of 2.3% will be achieved beyond the Building Regulations Part L 2013 ‘baseline’.
* Overall, it is anticipated that up to a 16.8% reduction in CO2 emissions beyond the Building Regulations Part L 2013 ‘baseline’ will be achieved.
* The Council is seeking to achieve a **BREEAM rating of ‘Excellent’ with a minimum target rating of ‘Very Good**’, and will also implement a number of sustainability measures, which are summarised below:

**Water**

* + Implement water efficient fixtures and fittings such as dual flush WCs
  + Implement water monitoring and leak detection

**Flooding risk** – site is located in a mixture of flood zone one and two

**Waste**

* Communal bin storage to cater recyclable and non-recyclable waste in line with BREEAM requirements.
* Contractor to minimise waste sent to landfill and implement an Site Waste

**Management Plan** (SWMP) for the construction phase

**Materials**

* All timber to be legally harvested and traded timber
* Products to be specified with responsible sourcing certification where feasible.
* Where feasible, use products with Environmental Product Declarations (EPDs) will be specified
* Materials to include recycled content where feasible

**Ecology and Biodiversity**

* Landscaping to improve upon existing green infrastructure and includes theplanting of new shrubs / trees.
* Planting will encourage new wildlife
  + An ecologist has been appointed and has undertaken a site survey and is advising the design team on measures to improve ecological value

**Transport**

* + - Secure cycle parking to be provided for visitors
    - The site also benefits from good access to public transport and access to a range of amenities

**Health and Wellbeing** – Consultation has been undertaken with local Crime Prevention Design Advisor (CPDA)

**Pollution**

* + Emissions of NOx and particulate matter will be minimised
  + Contractor to implement best practice pollution prevention policies
  + Internal finishes to be specified with low Volatile Organic Compound (VOC) or formaldehyde levels where feasible.
  + External lighting to specified and control to minimise light pollution

**Community** – The Contractor will be required to achieve a best practice score in the Considerate Constructors Scheme (CCS)

2. There are such serious inadequacies within the Transport Assessment that the application fails to meet the requirements of paragraph 32 of the National Planning Policy Framework (NPPF) on promoting sustainable transport.

**Our response**

* The National Planning Policy Framework states that decisions should take account of whether opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, whether safe and suitable access can be achieved for all people and improvements can be undertaken that cost-effectively limit the significant impacts of the development.
* The new Leisure Centre planning application details clearly demonstrate that this has been achieved. On and offsite improvements to improve access by all modes of transport are being provided and which reflect the input we have received through extensive engagement with users and local residents.
* The site is in fact in a very accessible location not just for the residents of the City but also to the wider District and surrounding areas and will help to reduce traffic movements and air pollution in the City Centre.
* The improved cycle and pedestrian route between Domum Road and Barfield Close will be provided by widening the route between the industrial units and widening the ramps linking the route between the industrial units to Domum Road.
* Lighting will also be upgraded to improve route legibility and security.
* Within the leisure centre site, cyclists are able to access the covered cycle parking area directly via the shared footways/cycleways north and south for the access road. The proposals include measures to provide safe and convenient crossing facilities on Bar End Road, the provision of safe and convenient pedestrian and cycle routes within the site and off-site improvements to pedestrian and cycle routes.
* Bus access will be improved by providing a new bus stop on Barfield Close, together with safe crossing facilities on Bar End Road  Detailed work has been undertaken to audit and identify where improvements to routes used to access the new centre are required and that are justifiable in planning terms.
* This audit has included consideration of issues raised by the Winchester Walking Group. Details of the proposed improvements (Walking, Cycling  Assessment and Review) are provided in the work that accompanies the S278 submission which sets out details of off-site highway works provide as part of the proposed new Leisure Centre.
* The Council also remains committed to consider capacity and enhancements to the Park & Ride service as part of the wider Winchester Transport Strategy and will do this during the next stages of the design.

3. The inadequacies within the Transport Assessment could lead to the development having significant environmental effects in terms of air pollution and climate change which have not been addressed and as such the development should be subject to an Environmental Impact Assessment

**Our response**

* The **Transport Impact Assessment** work undertaken follows and is in accordance with detailed guidance and has been carried out in consultation with Hampshire County Council as Transport and Highways Authority. A full air quality assessment was submitted as part of the planning application submission.
* The proposed development is **expected to lead to a small reduction in traffic** **in the centre of the city**.  It should also be noted that the assessments that have been carried out represent a 'worst case' in terms of vehicle impact.
* No allowance has been made for the expected shift towards sustainable modes resulting from the implementation of the Travel Plan for the new Leisure Centre and the coordination of the Travel Plan with the University of Winchester's own measures to minimise car use and maximise the use of sustainable modes.
* Similarly, no allowance has been made for the very significant opportunities for people using the adjacent park and ride sites to use the Leisure Centre before or after work and thus eliminate the need for a separate journey.  This approach has been undertaken to ensure that a robust design is prepared for the new access highway arrangements and to ensure that the new Leisure Centre does not cause traffic and congestion issues.
* The area within the new Sport & Leisure Park has been designed to facilitate pedestrian and cycle circulation and access and significant improvements are being made to off-site pedestrian and cycle facilities to facilitate the crossing of Bar End Road and to improve pedestrian and cycle linkages with key routes to the city centre and other residential areas.
* Highcliffe, parts of Winnall and St Cross and the majority of the city centre lie within 1 mile or a 20 minute walk of the new Leisure Centre.  The whole of Winchester town lies within reasonable cycling distance.
* Improvements are proposed to facilitate pedestrian movement using the main routes to and from the city centre and the link between the site and National Cycle Network 23 will be improved to make it more easily negotiated by cyclists.  A new link between the Garrison Ground and the King George V Playing Fields is proposed to both improve pedestrian circulation around the site and to allow convenient cycle access from the South Downs Way when a new pedestrian and cycle connection is provided as part of the wider Leisure Park proposals.
* The proposed development benefits from frequent park and ride bus services and bus access will be improved further through the introduction of a new bus stop on Barfield Close.  The No 4 bus service also stops within easy walking distance of the site.  A Travel Plan will be implemented to further enhance the site's sustainability.
* Detailed assessments of the impact of the proposed development show that it leads to small reductions in traffic in the city centre.
* This finding is consistent with the fact that a significant proportion of visitors will be able to access the new facility without the need to travel through the city centre road network, something that all current car-borne visitors are obliged to do.
* The proposals will lead to some increases in traffic on Bar End Road in the vicinity of the site but the proposed access roundabout is able to accommodate the expected level of additional traffic with minimal queues and delays.
* The additional traffic south of the proposed development is shown to have a minor impact on the operation of junctions.  The site benefits from the frequent park and ride bus services and access to these services will be made easier through the provision of a new bus stop on Barfield Close.
* Bus services are available for the majority of the day including the weekday and Saturday peak periods of leisure centre usage.  The presence of the leisure centre close to the No 4 bus service route will assist in supporting the commercial viability of the route and increase the chances of services being increased at all times including evenings and Sundays.
* Detailed consideration has been given to the effects of moving the leisure centre from its current location to Bar End Road.  Allowance has been made for the change in overall accessibility resulting from the change in location.
* Assessments of traffic impact are based on robust assumptions that do not allow any discounting resulting from the proposed enhancements to pedestrian and cycle access, the availability of frequent park and ride buses, the opportunities for users of the adjacent park and ride sites to use the facility before or after work or for the impact of the Travel Plan.
* Notwithstanding the robust approach that has been adopted in relation to vehicle trip generation, it is still found that the proposals will lead to a small decrease in the level of traffic in the city centre.
* The site benefits from frequent park and ride bus services that will be available from a new, convenient bus stop on Barfield Close.  It is currently possible to transfer between Stagecoach buses in Winchester by purchasing a Day-rider ticket (cost £4.40 if bought on bus or £4.30 if bought using mobile app).  This allows unlimited bus travel within Winchester for a day and can be used on park and ride buses.  It is possible to travel on a park and ride bus from the city centre to Barfield Park and Ride by buying a ticket on the bus (£1.55 Single, £2.60 return).
* Anyone using any park and ride site is entitled to unlimited use of all park and ride buses in Winchester so someone using the South Winchester site, for example, could use park and ride buses to access the leisure centre at Bar End at no additional cost. The site has been designed to facilitate pedestrian access and pedestrian circulation.
* The site will be accessed by pedestrians/ cyclists from Milland Road past the athletic track or from Bar End Road using the new crossing facilities north and south of the proposed access roundabout.
* A full consultation on on-street parking is being undertaken over the late Summer and will help to inform detail in relation to the Milland Road access route.
* The southern crossing facility comprises a zebra crossing to give priority to pedestrians.
* The main pedestrian route to and from the city centre and the pedestrian routes to and from the adjacent park and ride sites will benefit from some improvements to facilitate access on foot.
* The Council is also continuing to work with HCC on the wider Winchester Access and Movement Strategy to ensure that the Sport and Leisure Centre proposals reflect this and to seek opportunities to achieve wider benefits to improve accessibility and achieve environmental enhancements more generally.
* **Health and Wellbeing** – Consultation has been undertaken with local Crime Prevention Design Advisor (CPDA)
* **Pollution** – Emissions of NOx and particulate matter will be minimised
  + - Contractor to implement best practice pollution prevention policies
* Internal finishes to be specified with low Volatile Organic Compound (VOC) or formaldehyde levels where feasible.
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* Community – The Contractor will be required to achieve a best practice score in the Considerate Constructors Scheme (CCS)