



BOAYRD LOGHAN-SNAUE BARRANTEE YNNDAGH Y JIASS
SOUTHERN LOCAL AUTHORITIES SWIMMING POOL BOARD
ARBORY ROAD, CASTLETOWN, ISLE OF MAN IM9 1HA

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Secretary to the Planning Committee
Planning and Building Control
Department of Environment, Food and Agriculture
Murray House
Mount Havelock
Douglas IM1 2SF

19 November 2019



Dear Secretary

Planning Application 19/01137/A

Southern Community Sports Centre (SCSF), King William's College, Castletown

We would like to register our concerns and objections to the above application. We will be raising several objections under two main categories entitled 'local amenity' and 'wider economic impact'.

Local Amenity

1. The south of the island needs a new pool. The other regions have new pools and the Southern Swimming Pool (SSP) is nearing the end of its life. The new pool should be a community pool like the current SSP. A new pool was included in the plans for the new CRHS but has now been delayed due to the uncertainty caused by the SCSF proposal.
2. The SCSF pool has many factors which would make it an inferior community pool including:
 - a. The water temperature required for training is too cold for children's lessons.
 - b. There is no separate learner pool for children.
 - c. The width is very narrow (8m). The existing Southern pool is a similar width (7.5m) for half the length (25m) and is already problematic. A narrow, 4 lane pool is inferior for training. The Island Training Squad had to cancel training in the south because the SSP could not accommodate enough swimmers at the same time compared to the other regional pools due to the narrow width.
 - d. There will also be a lot of waves due to the narrowness.
 - e. Normally a 50m pool would have 8 or 10 lanes (not 4 lanes) and be at least 17m wide (not 8m). Such a water volume would not be possible with the current SCSF structure. Therefore, it would be much better to design a 25m x 13m pool with 6 lanes.
 - f. There is no viewing gallery. It is vital that parents can view their children swimming in lessons and competitions so that the pool gives a real community feeling.

- g. The promoters were vague about the depth. If the pool is too shallow, then it will be unsuitable for training (turns) and if it is too deep it will be unsuitable for younger children. That is why 2 smaller and separate pools are preferable.
3. The SCSF is a distraction from the need for Government to agree a site and start date for a new community SSP. Given that this is a training pool and not a community pool, the SCSF proposal should be considered as a separate project and should assume that the SSP will be rebuilt i.e. it is unacceptable that the SSP keeps being delayed because of a potential (unsuitable) pool at KWC.
 4. We feel that there is a potential conflict of interest for the MHK who is promoting the 50m pool. He also has a role in Treasury, as Treasury need to give the go ahead for the SSP.
 5. A new SSP would be a much superior facility for all swimming as it can be designed with the community in mind, rather than a specialised training pool. It could be superior due to the following reasons:
 - a. 25m x 13m wide is much better than 50m x 8m
 - b. A separate learner pool of 17m x 8m, shallow and higher temperature (29/30 degrees rather than 27/28 degrees in the main pool).
 - c. A viewing platform for 150 spectators and 6 spaces for wheelchairs. (No viewing platform or spaces for wheelchairs in the SCSF proposal)
 - d. The pool would be at the heart of the community in the CRHS grounds as opposed to being on the edge of town.

Wider Economic Impact

1. The pool and gym will be out of Castletown centre rather than in it as now. It is unlikely that there are enough customers to support 2 gyms and 2 pools. The SCSF will result in empty property in Castletown Square and a reduction in footfall in the centre. This will have a knock-on detrimental effect on other businesses there and lead to a likely reduction in rates.
2. SCSF will be built on land leased from KWC. It is better to build a new pool on land already in public ownership i.e. on CRHS site at no cost and with certainty over the future.
3. The IOM Swimming Association is run by 1 paid coach and volunteers. A lack of the latter results in cancelled training sessions when different locations are being used simultaneously. A further training facility would therefore result in more cancellations at public pools.
4. The provision of a 50m training pool in the Isle of Man is unlikely to bring athletes to the island due to lack of international coaches and shorter travel times within the UK to competitions. For the same reasons, a 50m pool is will do little to encourage Manx athletes to remain.
5. There is a lack of financial information to assess the viability of SCSF proposal and therefore the impact on the wider economy. The following points need clarification-
 - a. If a charity is leasing the land from KWC, there will be no rates on the site? The current SSP pays rates.
 - b. The charity is raising £6 million from investors to fund the structures. These investors will want a return. By definition, people do not invest in charities; they

donate and do not expect any return. The use of a charity is therefore questionable.

- c. The promoters stated that the SCSF would be based on a David Lloyd model i.e. where gym revenue subsidises a small pool. Using such a model, to breakeven the number of gym members would have to be 600 to 800 (according to D. Parnell). Where would such customer numbers come from? Assuming at monthly membership fee of £50, this would only generate £360,000 to £480,000. This would be insufficient to cover costs.

Overall

We **object** to this planning application due to the material considerations outlined above and believe that planning permission should be refused. It has been and will continue to be a distraction from providing a proper community pool at CRHS as well as having a detrimental effect on businesses in the centre of Castletown.

If planning is approved, we would recommend 5 conditions:

- The charity should deposit sufficient funds with the Government to cover the removal of the SCSF should it fail to be viable. The Government and hence the taxpayer should neither bail it out or be left with a vacant eyesore.
- A strict time limit should be stipulated so that the uncertainty over the new SSP at CRHS is brought to an end e.g. 6 months from planning approval to commencement of building work and 12 months to completion.
- The type of shops to be housed at SCSF should be specified
- A guarantee on the cost, amount and timing of public access plus the provision of affordable swimming for specialist groups like Mums & Tots.
- The full business case should be published to enable a detailed assessment of the impact of the SCSF on local amenities and the wider economy.

Yours faithfully

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Chairman

Southern Local Authorities Swimming Pool Board