

SAVE VICTORIA BATHS
Objections To The Planning Applications
10/00629/NFUL3 and 10/00630/LNCAC

This document is a detailed examination of the plans to demolish and redevelop the Victoria Leisure Centre as described by planning applications 10/00629/NFUL3 and 10/00630/LNCAC. In preparing this response the campaign has consulted with its supporters who come predominantly from within the communities of St Anns and Sneinton. This document draws on their views to present its analysis, using wherever possible existing policy documents for context.

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THE CLAIMED BENEFITS AND HOW THE PLANS FAIL TO DELIVER THEM

1. REGENERATION

The application claims that this scheme is essential for regeneration of the area. In fact the present proposal would be detrimental for future regeneration as it is unsuited to the site, ignores good urban design practice, gives the area a dated image through poor architectural design and promotes anti-social behaviour.

1.1 The proposed use is not suitable for the selected site

The 'Zone 2' site is essentially a very poor location for a 'modern box' style leisure centre development.

Zone 2 is unsuitable because of its size and its urban location. It is a very tight site for a building of this size, it fronts on to two public spaces (Sneinton Market and Bedford Row), is flanked by the listed Ragged School building and historic Clock Tower, and slopes downhill. Successful regeneration of this site would call for a building that can have two active fronts, be appropriately scaled to complement the historic setting, and step down the hill to create ground level activity to stimulate Sneinton Market. These are basic regeneration requirements, and yet a standard modern leisure centre such as this can provide none of them:

Zone 2 requirements for successful urban design	The proposal: Modern box style leisure centre	Appropriate use for this site?
Two active frontages	One active frontage, three backs	No
Scaled to complement historic setting	Large single volumes set the scale	No
Step down slope to create street level activity	Floor flat regardless of terrain	No

The application does not give consideration to placing a new build centre on another part of the available site: rather it simply states that 'the brief was to locate the new leisure centre on the footprint identified by Option C' (4.15). No analysis is presented that looks at placing the new centre elsewhere on the site, which would have been essential to justify this application. Other options do exist, for example placing the new centre on 'Zone 1'- a larger part of the site with fewer constraints, freeing up Zone 2 for a more suitable reuse.

1.2 The proposal contravenes local, city wide and national regeneration and development guidance, setting a bad precedent for future developments by private sector

Non-statutory guidance on successful strategies for development and urban design is produced at national and local level, This Council-owned site represents an opportunity to set the tone for future development in the area, yet it contravenes

recently produced guidance in several ways. It will clearly be difficult to get private developers to conform to the guidance in the future if these proposals go ahead.

The SNEINTON MARKET NEIGHBOURHOOD DEVELOPMENT PLAN (NDP, 'Gehl report' June 2008) stressed the importance of taking a long view rather than rushing ahead in the conventional development style: 'Consider the long-term prospects of the area by working to a 'one-generation-plan' aimed at incremental - but steady - improvement' (p.6). By pushing an inappropriate function on to this site and rushing it through, the Council are taking exactly the opposite approach.

Other guidance from the NDP is also ignored:

Sneinton Market Neighbourhood Development Plan guidance	This proposal	Proposal follows guidance?
Use edges of site for different functions when large single entrance spaces are required (see bus depot plans, p.41)	Zone 2 is only just wide enough to squeeze the leisure centre in, so there is no opportunity to create active edges	No
"VLC is rebuilt as a diverse urban block with 4 quality edges" p.44	The design has essentially blank walls to Bedford Row and to a new alleyway to the North edge.	No
"VLC complex activates all 4 edges of the block" p.44	The proposal in fact makes the situation worse by removing the windows that currently overlook Bedford Row	No
"No closed facades- active and soft edges". Four different ownerships and four different entrances envisaged along Sneinton Market square p.27-28	Only two entrances (Leisure Centre and Cafe) to square	No
Back of pavement: No Set Backs means no free standing singular "object" buildings p.22	Set-backs on the East and West between the VLC and the Ragged School and a new alleyway to the North mean the VLC effectively becomes freestanding.	No

The NOTTINGHAM CITY CENTRE URBAN DESIGN GUIDE ('UDG', May 2009) sets out 'rules' for the design of future developments in the city. The plan puts the Leisure Centre site into the city's 'Zone of Repair', as an historic conservation area, and defines levels of street activity expected from new developments.

Nottingham City Centre Urban Design Guide guidance	This proposal	Proposal follows guidance?
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Nottingham City Centre Urban Design Guide guidance	This proposal	Proposal follows guidance?
In the Zone of Repair, "redevelopment, when it takes place will respect and repair the historic character of the area" (p.15)	Demolish a major part of the existing historic building, leave another part derelict. The new design is totally out of character and scale with the surroundings	No
"Building lines cannot be changed in the Zone of Repair" 1.2 (p.18)	New set backs are created, and a new alleyway introduced.	No
There should be a continuous street frontage (1.7, p.19)	New set back to Ragged school, new alleyway, new (North) facade created to clock tower,	No
Sneinton Market edge should have 75% Active frontage. Active Frontage is defined as "ground floor shop windows or transparent frontages so that the activity within the building is visible from the street."	Only two entrances (Leisure Centre and Cafe) to Sneinton Market. Rest of activity is deliberately screened from Gedling Street and Bedford Row due to privacy concerns.	No
Eyes onto the street: New buildings should not present blank facades to the street . All elevations fronting onto streets and public spaces should include windows on the ground and upper floors.	Deliberate screening of the interior from Gedling Street and Bedford Row means both streets are left without natural surveillance for most or all of the length of the building.	No

The DETR/CABE "URBAN DESIGN IN THE PLANNING SYSTEM: TOWARDS BETTER PRACTICE" (2000) gives nationally recognised guidance on good urban design. In addition to many points covered above in the UDG and NDP:

DETR/CABE Urban design in the planning system guidance	This proposal	Proposal follows guidance?
- Avoiding blank walls at ground level. "On a sloping site, buildings that sit on the real ground and step up the hill are more likely to contribute to local character and avoid blank walls at ground level than large monolithic slabs that ignore the topography". (p.21)	By ignoring the local topography, the building presents a monolithic slab podium to the street.	No

DETR/CABE Urban design in the planning system guidance	This proposal	Proposal follows guidance?
"Space left over after development, without a function, is a wasted resource and will detract from a place's sense of identity. It is likely to be abused and vandalised, diminishing safety and security". (P.25)	The proposal leaves the present Turkish Baths site undeveloped and derelict, cut off from the main building and with no proposed use.	No

1.3 The design response would project a poor image of the area and is inappropriate for its context.

The high profile site is intended to act as a regeneration catalyst- yet the designs show a building that is reminiscent of the existing 1970s squash courts it replaces.

Nottingham has suffered in the past from a number of inappropriate developments that have been out of scale with their surroundings. The Victoria Centre clock tower is one example of what can happen if fragments of existing building are left as token gestures to the past, surrounded by buildings that are out of scale and use alien materials. In defence of such designs from the 1960s and 70s, they were very much of their time, demonstrating ambition and excitement about the future.

The current proposal for the VLC has all the faults of the 1960s and 70s, without any of the excitement or ambition. In fact its main source of architectural inspiration would seem to be a period that is now regarded with derision. This is definitely not the image that Nottingham or the market area needs to project if it is to encourage further development.

In heritage design terms, this is a highly sensitive site, bounded on all sides by listed buildings and in a Conservation Area. Much is made in the planning application about the small gestures towards the context, such as lowering the building or setting it back from its neighbours. Most of these gestures create complexity without achieving the stated aims (to make the building look like an extension to the clock tower, and to make it subservient to the existing buildings). In fact, few of the stated design aims are achieved:

Stated design aim	The design	Aim achieved?
4.1.1 Enhance the setting of the Clock Tower by making it more prominent in the townscape.	Demolish original single storey wings and butt new two storey building up against clock tower. Effect of scale gradually increasing up to the tower is lost.	No

Stated design aim	The design	Aim achieved?
4.1.3 Enhance the setting of the Nottinghamshire Wildlife Trust (former Ragged School)	New set back created adjacent- a fenced in service yard which does not enhance setting. Scale of pool hall when viewed against rustic design of Ragged School is completely alien. Materials are claimed to be in keeping with the warmth of existing building, but glass, white concrete and bronze curtain walling are also completely alien (they have presumably been chosen because the architect is familiar with them from previous projects such as the Reef development in Nottingham)	No
4.1.3 The massing of the building... has been carefully considered following the analysis of context...	In fact the massing of the building is set by the functional arrangement of the spaces on the site, as the planning application acknowledges: "... there is only really one suitable option for the arrangement of the pools on this part of the site". The spaces are laid out so that it "... works well from an operational perspective".	No
4.1.7 The new part of the building is subservient to the old.	Small gestures are made with the new building so that is slightly lower and further back than the clock tower, but the new building is visually very dominant of the old. The architect does not seem to understand the effect that scale has on design- the openings of the new facade are much larger than the old, culminating with the massively scaled facade of the main pool hall, whose columns stretch the full height from its massive white monolithic podium to the roof. Visually, the new building completely dominates the old.	No

Stated design aim	The design	Aim achieved?
4.1.8 The gap between the new building and the (Ragged School) will be turned in to a breathing space for plants and wildlife in the predominantly hard buildings and landscape of the area.	The drawings show a highly overshadowed service yard with defensive metal gates. It is a left-over area which will not be an effective habitat.	No

1.4 The design increases rather than reduces the likelihood of anti-social behaviour.

The area surrounding Victoria Leisure Centre suffers disproportionately from anti-social behaviour, in particular street drinking and drug use. Local people are very keen that the new investment in the Sneinton Market area and the rebuilding of the Leisure Centre should be an opportunity to use good design to minimise the effects of this ASB and certainly do nothing to make such a deep rooted problem worse.

Aspects of the new design do not appear to have been thought through properly with this in mind.

The concertina constitutes a 'crime feature' as defined by SECURED BY DESIGN: DESIGN PRINCIPLES (2004), the guidance given by the police on design which promotes security. It creates a security and privacy risk by providing areas which can be climbed on, requiring monitoring and action by centre staff: 'in the event that people do climb up on to this they will be very visible from within the centre whereupon they will be moved along by the centre's staff' (4.8.2). If the staff have to come running out each time someone climbs up, we will have fantastic version of the doorbell game on our hands- it sounds like a great dare. Clearly, it will be possible to jump up and take a look in the pool, negating any privacy demands specialist swimming sessions.

This façade prevents natural surveillance as defined by SBD. The area immediately outside (currently the pavement running down along the squash courts) is not secured by passive observation from within. This means that current anti social behaviour patterns (drinking and drug dealing) can & will continue. If anything it makes matters worse because at least at the moment it is possible to see out from the table tennis room.

The new design creates two new 'fear generators' as defined by SBD. The first is where two of the 'backs' of the new building are exposed, to Bedford Row and to the North where a new alleyway is created. The design proposal also acknowledges that what little glazing there is may have to be obscured when the adjacent site is developed, due to privacy issues. This area is already a hotspot for dealing and drug taking as evidenced in Victoria Park Tenants and Residents meetings. A new alleyway difficult to see into would make matters much worse.

The second is the left-over part of the site in this proposal (what is currently the Turkish Baths). This will be very difficult to develop in the future and the current proposal also makes it very difficult to deal effectively with the corner opposite the listed Baths Inn. Potentially contaminated from the existing pool plant and containing

the abandoned Turkish Baths, the basement and partially filled pool tanks, this site is likely to stand derelict for many years. It is most likely to become a haven for drinkers and drug users and will take constant and expensive security measures to prevent it becoming so.

Finally, the Secured By Design principles call for "clearly defined environments" where what is public and what is private is clear. This is not the case for Bedford row, the space next to the wildlife trust, the alleyway to the north of the clock tower not the abandoned site.

2. ACCESSIBILITY OF THE CENTRE TO THE COMMUNITY

The application claims that the new development is essential in order to improve disabled access to the centre. This is not only false, but accessibility is actually reduced to large sections of the community.

2.1 Mixed sex changing.

The plans clearly show a changing village, in place of the current separate male and female changing rooms. Within the changing village, there are booths where people can actually undress etc but they will still emerge in their costumes into a mixed sex environment. This is not acceptable to cultural groups for whom this level of physical intimacy is taboo and offensive; and it will mean when, for instance, groups of Muslim women wish to use the centre they will have to have exclusive use of it which will mean no one else can use the centre at that time. A similar problem will exist when groups of school children use the centre, in that some schools will question whether or not it appropriate for their children to share a mixed sex changing environment and may end up having to single sex swimming sessions. This complicated state of affairs is likely to mean schools swim /ess at the centre.

Crucially, in its document DESIGN GUIDANCE NOTE: SWIMMING POOLS (2008), Sport England recommends that "early consultation takes place with stakeholder groups with a view to understanding the full requirements of all user groups." and that "Specific requirements should be determined by appropriate consultation prior to preparation of the brief."

Mixed village style changing rooms were specifically rejected at the stakeholder consultation in November 2008, when community representatives clearly stated that mixed changing would be inappropriate for wide sections of the culturally diverse communities of Sneinton and St Anns that this facility serves.

2.2 Lack of privacy.

Because the design of the plans puts the swimming pools in a place overlooking the Market, the big problem will be that people using the public market place will be able to see in. Despite the complicated and costly provisions the designs have put in place to try to ensure privacy, they do not work. If the complex facade does work for privacy, then views out will be blocked. Conversely, if it does work for views (as it seems to), then occupants will have their privacy compromised by feeling exposed. The D&A statement points out that from the medium distance (25m, or one pool length) swimmers walking round the pool will be on display (diagram, p.24). The D&A statement points out that people actually swimming will be hidden, but then anyone who has ever felt self conscious will realise that it is when you are out of the water that you feel exposed and require privacy. It is therefore inevitable that people using the pool will feel visible in a way that will make a good number of them feel

uncomfortable. Again, this is especially true of women's swimming groups who currently use the centre for ladies-only sessions specifically to avoid public gaze and to feel comfortable and confident when swimming. The loss of this privacy will have a significant impact on this user group and there is also a likelihood that it will dissuade those who have weight problems and who feel self-conscious about their bodies from using the centre. St Anns and Sneinton have some of the highest rates of obesity in the city, with all of its associated health risks. The centre needs to play a vital role in addressing this. The lack of privacy prevents the centre from doing so.

The current centre has two pools which are visually removed from each other, enabling the centre to cater for a variety of different user groups who may wish to use the centre simultaneously for example, a ladies only session in one pool, whilst a water aerobics class uses the other. The new design puts both pools in the same pool hall, and therefore precludes such flexible programming meaning that fewer people will be able to use the new centre.

Sport England make the following observations in their design guidance about combining two pool tanks in one hall:

- It will not necessarily reduce the numbers of lifeguards required.
- It limits the possibility to close off one pool and leaving it un-supervised.
- It compromises the privacy that some user groups require e.g. people with disabilities, cultural or faith groups or single sex sessions.
- Many users will be quite relaxed to swim in a public area, but equally there may be personal, religious or cultural reasons that make people/groups uncomfortable about being visible in their swimming costumes.
- To programme the use of the whole swimming pool(s) for dedicated sessions at certain times may be cost prohibitive.

Again it states the need for consultation and none of the sort recommended has taken place in the development of this plan: "Specific requirements should be determined by appropriate consultation prior to preparation of the brief. To engage with the whole community consideration should be given to providing a greater degree of privacy for some users groups."

2.3 Loss of social heritage will alienate the local community and damage local regeneration.

The current Victoria Leisure Centre has been in almost constant use since 1850. It has served the local community as a washhouse, a place where many generations learned to swim, a laundry and a place of entertainment where national boxing and wrestling matches took place. It generates a great deal of local affection; most people in St Anns and Sneinton have a story to tell about the role of the building in their lives. Please see Appendix One for letters which were submitted to the Save Victoria Baths campaign about the reminiscences of current residents who will tell how their parents met there; how 3 generations of the same family learned to swim there; how they roller-skated on the covered pool in the winter months of the '50s; about how the balcony of the Gala Pool was packed to the rafters to see Connie Jeans, Olympic athlete, racing there in the '20s; the Nottingham Mermaids display team; and the stories of many, many children who would accompany their mothers to do the laundry there and bathe.

It continues to serve an important function of social cohesion in a community which faces a number of problems and threats: This is not just a Leisure Centre but a key potential hub for building a stronger safer community in the future. By ignoring the

strong and clearly expressed local will to see the centre refurbished rather than demolished and rebuilt, the current proposal will reduce local civic engagement by suggesting that 'having your say' has no effect. This in turn will threaten efforts to develop successful local regeneration.

Prior to the announcement of closure there were nine local badminton clubs that meet there regularly, some of which had been playing there for 30 years. The public swimming sessions retain a healthy base of local users; and the Turkish Baths have loyal group of users who attach great importance to their regular sessions. After seeing the new designs on Friday, local resident Annika Yule said: "It's so sad. They are really depriving the community of a unique space where there are full days for women only." Sandra Farrell from Aspley said "It's multi-cultural, we're all here together. It's the thing that keeps us sane for the rest of the week". St Anns resident, Maria Rooney said "It's really good value for money and you don't have to pay a monthly membership fee like private health clubs. I don't know what we're going to do."

The Government report, WORLD CLASS PLACES-THE GOVERNMENT'S STRATEGY FOR IMPROVING QUALITY OF PLACE (2009) recognises the importance of the built environment in creating places where people want to live work and communities thrive. The report accepts that it plays a key role in influencing crime levels, health, education, social inclusion, community cohesion and well-being.

The historic environment was identified as one of the four factors which influence quality of place and is very important in developing a sense of place, identity and making somewhere a better place to live. This thinking has been taken further by English Heritage in the development of their concept of 'social capital', the bonds that connect groups and individuals. The English Heritage report, "HERITAGE COUNTS" (2009) asserts that a stronger sense of place and social capital has a proven link to beneficial social outcomes such as increased well-being and even stronger and welcoming communities. It has a significant impact on wider social agendas. This is backed by robust evidence.

Both reports signal the importance of retaining as much of the original Victoria Leisure Centre as possible in order not to lose the sense of place that has built up, like layers of bark in a tree, over many decades. This priority becomes more urgent when one considers the social problems that confront the communities which the centre serves and the emphasis placed on the role of the development in kick starting regeneration.

The new development takes no account of this shift in thinking and thoughtlessly discards the social heritage. Like felling a tree, the act of demolition will be swift yet the years it destroys will never be reclaimed, and it is highly likely that the new centre will not last long enough to build up a similar place in the community's sense of itself and its history.

3. SUSTAINABILITY

There are two significant environmental design flaws.

3.1 Poor energy design

The new design is at odds with the Council's own policy to "deliver high levels of sustainability in advance of national standards in order to mitigate against and adapt to climate change" as outlined in its policy for overall spatial vision for the city (GREATER NOTTINGHAM ALIGNED CORE STRATEGIES 2010)

Opportunity for solar water heating has not been taken. The roof profile of the new design does not lend itself to solar collectors due to the angle of the south-facing elevations/roof structures'. The existing Gala Pool and the Learner Pool however, each have a south-west facing roof, ideal for solar water heating and as such present a major advantage over the proposed new building in terms of carbon management.

The plans claim that the "project maximizes (the) use of natural daylight & incorporates roof lights in addition to glazing to the south-facing facade of the pool hall'. However, close examination shows that the facade of the pool hall faces east, not south- increasing the risk of low level light creating 'glare' (when light on the surface of the water prevents the lifeguards from being able to see the bottom).

Elsewhere in the application there is the admission that 'The actual light levels in the pool hall are always supplemented by artificial lights to the levels required'. It is worth noting that the current Gala Pool only needs additional lighting in extremely gloomy weather - and at night of course - and does not suffer from glare. According to the testimony of practising lifeguards at the current centre this glare is caused by light hitting the water at a low angle, which it of course will when the morning sun shines through the east-facing facade of the proposed new main pool hall.

The new plans mention other sustainable systems proposed for the new site, two of which (air-source heat pumps and grey water recycling) could easily be fitted into the current building; and third of which - District Mains Heating - is already in use in the current building.

They also mention the potential installation of a Biomass Boiler Plant: 'Due to the anticipated heat demand on the development from the heat exchangers & air handling units, a biomass boiler plant would be able (to) provide a significant amount of heat energy to meet the base loadings of the whole development. This in turn will significantly reduce the size of the district heating plant'. This laudable aim is undermined by the qualification that 'the area available for plant is limited due to the physical boundary of the site and financial constraints'.

It is important to note that there is no shortage of space in the current VLC.

3.2 The design squanders vast amounts of embedded carbon.

The demolition of the existing building squanders the considerable embodied energy within it and the impact of this upon the Council's carbon footprint is widened by the waste created from demolition. This is at odds with the Council's own carbon management plan, in particular Section 4.32 of 4.3 Design & Asset Management which aims to pursue refurbishment projects in order to explore low carbon solutions.

In its document, SUSTAINABLE DEVELOPMENT STRATEGY (2006) English Heritage calls for "using existing buildings efficiently" as a "global priority". They acknowledge that replacing a building demands a considerable investment of energy: the energy embodied in the old building will be lost, and further energy will be used in its demolition. To this must be added the cost of materials (including transport) and construction of the replacement building.

The government's Performance and Innovation Unit report, RESOURCE PRODUCTIVITY (2001), has noted that 'energy is consumed in the production of construction materials such as bricks, cement and metals and in their distribution. Over 90 per cent of non-energy minerals extracted in Great Britain are used to supply the construction industry with materials, yet each year some 70 million tonnes of

construction and demolition materials and soil end up as waste' (PIU 2000) This accounts for 24 per cent of the total waste generated by the UK.'

It is extremely doubtful that the new design for the VLC would be sufficiently more energy-efficient than the current building to make this equation balance over its lifetime. Previous studies have shown that it would be possible to refurbish the VLC to achieve a BREEAM 'Excellent' rating- the same environmental rating as the current proposal.

English Heritage recommends consideration be given to:

- the cultural and social significance of the old building
- the embodied energy of the old building, and its whole-life energy costs
- the costs of any improvements to increase the energy efficiency of the old building
- the whole-life energy costs of the proposed new building (including the energy which would be expended in demolition and rebuilding)
- the sustainability of the new building (in terms of both energy and materials);
- the likely lifespan and durability of the new building
- the adaptability of the new building to future energy improvement.

Using existing buildings wherever possible rather than rebuilding is an excellent way of minimising energy use and greenhouse gas emissions. The new design singularly fails to do this.

THE SCALE OF THE LOSS

4 LOSS OF FACILITIES

The current building houses two pools (one gala at 33.3m and one smaller pool at 20m). The new building offers replacements for both which are smaller and which constitute a 30% reduction in swimming space.

The current building houses a Turkish Bath complex comprising a steam room, a sauna, three generously proportioned hot rooms with recliners to relax on, an ice machine (put in some years ago to replace the plunge pool) with surrounding benches to sit and scrub down on, three cold showers including a 360 degree needle shower, three variable temperature showers, toilets, and a large lounge complete with recliners and comfortable chairs. The proposed new facility would offer, in its place: a small sauna and steam room with three small, separated rooms to relax in, toilets and conventional showers. The current facility is large enough to allow for a truly social experience with a large numbers of people using the facility at any one time, creating a strong, cross-cultural, cross-generational sense of community. This is a unique facility in the East Midlands and one of only a handful of similar baths in the country. The proposed replacement would be far inferior in provision of both space and quality of experience, notwithstanding the potential difficulty of building such a facility within the curtain of the clocktower.'

The current building contains a sports hall which serves as four badminton courts (which are widely appreciated by badminton players for their high ceilings and unobtrusive lighting) and has been used flexibly to accommodate (amongst other things) basketball, kick boxing, cheerleading, capoeira, martial arts, short tennis and until recently a beer festival. The new facility has no sports hall and offers only a small function room, similar in size to the current Bedford Room. Incidentally, when

the centre closes on April 1st the city will have lost 28% of its badminton provision in one week as this closure coincides with the closure of Noel St and its badminton courts.

The current centre also offers a modest gym, a function room and a training room which is used regularly by the local Victoria Park Tenants and Resident's Association. Of these, only the former is being replaced in the new building.

5. LOSS OF ARCHITECTURAL HERITAGE

Under an "Act to encourage the Establishment of Public Baths and Wash-houses", which had been proposed on 2 February 1844 but which was only passed on 26 August 1846, "about 120 acres were allocated to the Corporation in trust for the inhabitants, including the site of the present Victoria Park and cemetery, and the present Victoria Baths which occupy the same site as the first public baths to be built in Nottingham."

Sneinton Market, and indeed the surrounding conservation area are dominated by Victoria Leisure Centre (H Moses Wood 1850 / Marriott Ogle Tarbotton 1877 / Arthur Brown 1896 / T Wallis Gordon 1926 / David Jenkin 1973). It is surrounded by four Grade II listed buildings, all the subject of regeneration in the last ten years: Victoria Park View flats (Bakewell & Bromley 1876), refurbished at the start of an intended Market Area regeneration, Bancroft's building (1869 / 2003), the Ragged School (Edwards 1858-9) and the Bath Inn (c1820 / 1928). Nearby are the Grade II listed houses of the Promenade.

The Gala Pool is situated in a beautiful light- filled space created by a central rooflight running the length of the roof. This creates a feeling of spaciousness and connection with the outside, while retaining the privacy so important for a swimming area. The pool itself is unusually long and consequently good for length swimmers while providing lots of space for families and more casual users. It is true, as the application states, that 'The pool halls are both internal spaces that have no presence on the exterior of the building'. They are, however, part of a public building, accessible to all, and in that way their heritage value is important.

The Sports Hall is the oldest part of the current complex; built in 1876 with wrought iron arches of the same design as those in the recently restored London St Pancras railway station. This space is also generously lit from a central rooflight running the length of the hall.

6. LOSS OF SOCIAL HERITAGE

The impact of the destruction of the VLC that approval of these plans would signal has been explained clearly in Section 2.3. There is no need to revisit this other than to point out that in a time when such emphasis is placed in policy on the need to bring communities together, the impact of losing the social heritage of the current building needs to be considered very carefully against the proposed merits of the new building.

THE FLAWED CONSULTATION PROCESS

7. HOW FAR DO THE PLANS ADDRESS THE CONSULTATION FINDINGS?

In 2008 Nottingham City Council announced the imminent closure of the Victoria Leisure Centre, on the grounds that it deemed the building unfit for purpose and too expensive to maintain or refurbish. In its document, "VICTORIA LEISURE CENTRE – 10 KEY QUESTIONS AND ANSWERS" (FEB 2008) it cited the figure of £1.3million as

needed for basic repairs and maintenance, saying that it would be 'prohibitively expensive to bring it up to scratch' (Councillor Trimble, Executive Board meeting at Council Chamber March 2008). and using pictures of long-derelict parts of the building to illustrate the point which were reported to the Ombudsman.

In response a local campaign group, Save Victoria Baths was established to lobby the Council to retain the centre and invest in it. The campaign engaged the interest and involvement of thousands of local people who petitioned (3984), wrote (107) marched (200) and took part in the Council's survey (1087) over the brief 4 week consultation period prior to the closure. 80% wished to keep the existing facilities: "Many see the VLC as an iconic building for the Sneinton Market area and are keen that its form as an historic building is not lost to the City and the immediate area"

("TELL US YOUR VIEWS" COUNCIL PAPERS FOR EXEC BOARD MEETING MARCH 2008)

In response the Council voted to close the leisure centre, with the proviso that a new one be built in its place. They promised a sum of up to £7million to achieve this. As part of its settlement with the community it invited the campaign group to join a Working Group to create a brief for a new leisure centre. This brief was to decide where a new centre should be built, and if this to take place on the existing site, how much of the old centre to retain.

In order to elicit the nature of how a "new Victoria Leisure Centre" should look, a second, focussed consultation organised by the Council and delivered by TANC took place on May 1st 2008 ("THE FUTURE OF VICTORIA LEISURE CENTRE" SURVEY 2008). Key findings from this were that 93% of those surveyed would rather see Nottingham City Council put the money they promised into making VLC better, rather than building a new Leisure Centre somewhere else; and when asked "What bits of VLC building would you like to see kept", the top 5 responses (in order of popularity) were: all of the building; Swimming pools; Clock tower; Turkish baths; Sports Hall.

In November of the same year, the campaign held a further consultation to try to find out more around the sentiment of 'making the VLC better'. 92% of those surveyed agreed with the statement, "I want Victoria Baths to be done up. This would save some of the best bits of the building while making it more modern". Only 7% agreed with the statement: "I want a new building to be in place of Victoria Baths. This would give a purpose-built building, all new."

8. THE FLAWED DEVELOPMENT OF THE DESIGN BRIEF

The Working Group's task to develop a design brief lasted several months and was fraught with difficulty due to the way in which the agenda of the Working Group was dominated by Council officials who continually lobbied for extensive demolition and rebuild. A chronology of events follows. Please note that few of these meetings were minuted despite repeated requests from Working Group members.

April	30	First meeting of VLC Working Group- concern that Councillors have decided fate of the facilities (pool only, no dry facilities- no plan to consult).
	28	2nd Working Group meeting- visit to VLC with slide show of a demolished building and minimum footprint new leisure centre on the site. 1st draft development brief presented. Misleading comments on cost of refurbishment.

April	12	Working group meeting- Headline results from May 31st consultation, campaign response to Draft Development Brief and report on refurbishment feasibility presented.
	23	Working Group meeting- Campaign work on refurb vs new build presented and well received
	30	Sub group meeting to considered technical pool related matters
July	3	2nd draft brief issued- No sports hall. 3 options (in terms of facilities) mentioned. Working Group not named as client or partner. No intermediate consultation stage.
	9	Working Group meeting. Full condition survey information requested (agreed by Nigel Hawkins)
	11	3rd draft brief issued. Several aspects not as agreed in the meeting.
	24	Announcement that NRL to lead appointment of design team for feasibility. 4th Draft brief circulated- still contains different requirements to those agreed eg for swimming pool.
	20	Final brief requested and reminder about issuing condition survey information to Nigel Hawkins. Transpires that a brief is being developed by NRL, and the Council will be the client for the work (not Working Group)
September	4	Reminder to NH about condition survey work review.
	8	Final development brief issued. Tip off from an Architect that this brief had already been released as part of a tender document seeking design teams for the project (prior to final approval by Working Group)
	10	Working group meeting. No condition survey information. Unhappy that brief has gone out without the 2 pools as agreed, or connectivity to the Market. Working Group/SVB not to be part of the panel selecting architects.
October	13	Another reminder to NH to release the condition survey information.
	20	Another reminder to NH to release the condition survey information, otherwise Freedom of Information
	22	Condition survey information released. Contains 'updated' figures but this consists of 4 major items totalling £1.18m buried in the middle of the text. Calls in to doubt the Council's original decision to close the centre on the basis of refurbishment cost. Levitate confirmed as Design Team.

Please note the way in which the brief, initially framed by a misleading estimate of refurbishments costs that ruled out retaining the sports hall, moved from being a brief around the re-development of the leisure centre to one about developing an area of land on which the centre stood. This was not what was consulted upon, neither was it the pretext for setting up the Working Group.

9. THE FLAWED CONSULTATION PROCESS ON THE DESIGN OPTIONS.

On Jan 5th 2009, with 10 days notice (most of which fell over the Christmas period) and after a last minute change of venue, three designs were unveiled at a third public consultation event following the appointment of Levitate to work on the contested brief.

The majority response from those who managed to attend was in support of the Option A, the design that retained and refurbished the original building and features. As the planning application documents concede 'Option C was not the preferred option of the public exhibition in January 2009' (3.1.7).

The Council then extended the consultation period, during which more responses were invited. It used a questionnaire which was distributed widely across the local area. The questionnaire was accused by local people as being misrepresentative and using leading arguments. Options B & C were presented in a favourable light (dimensions of pools sizes were given, mention was made of novel features such as a moveable floor and attractive visualisations were used of features which were actually required by the brief to be present in all the options) and key aspects of campaign's preferred option A (such as the fact that it was the cheapest, and the only one to retain a Turkish Baths) were not mentioned. Other 'benefits' of Option C against Option A laid out in the consultation such as competitive revenue costs were based on complete supposition (and have in fact not been borne out in reality). The consultation invited responses in the form of a 'tick-box' system; but the boxes only asked for responses to what Option A didn't have as against what Option C did have – not a balanced process at all.

In spite of this blatantly manipulative process, the majority was again in favour of the Option A. In total, during this period, 61% chose Option A which retained almost all of the building & facilities, with the proviso that the Sports Hall be retained. Only 15% chose Option C, the Council's preferred option (APPENDIX ONE – SUMMARY OF CONSULTATION VICTORIA LEISURE CENTRE AREA 6 COMMITTEE PAPERS APRIL 7th 2009).

Subsequently, without informing the members of the Working Group, the Council visited 3 primary schools to canvas the opinions of the pupils in what has been condemned as a deeply flawed exercise even by the Headteacher and parents of one the schools, William Booth Primary School (LETTER FROM ANDY MATTISON TO AREA 6 COMMITTEE 1/3/09). Perhaps unsurprisingly, given the nature of this consultation and the young age range involved, Option C was the more popular design in this stage of the consultation.

Using this latter consultation as its justification, the Council then voted to develop design Option C. It is notable that many of the disadvantages mentioned of Option A were solved (and costed, but not illustrated) when the final report went to Area 6 committee, and some of the claimed advantages of Option C now no longer apply since the brief was 'reworked'- Sport England standard, and separate changing rooms for example.

10. BRIEF CHANGES THAT HAVE RESULTED IN A MUCH REDUCED OFFER

Changes have been made to the brief since the developed Option C that was presented to the Area 6 committee. The new brief has not been subject to consultation with the public. The planning application claims that the changes were developed to 'place a greater focus on the new pool being attractive to families and young children' (3.1.10). The following reduction in areas is not mentioned in the planning application:

	Option C	Planning application	%age area change
Main pool	13 x 25m	12 x 25m	-8%
Learner pool	8 x 13m	7 x 12m	-19%
Child splash area	4.5 x 5.5m	2.5 x 7m	-30%

	Option C	Planning application	%age area change
Sauna, steam and relaxation rooms	150m2	75m2	-50%

The sauna and steam room has lost its plunge pool, included in the developed Option C in order to recreate a reduced version of the current very popular Turkish Baths. It is also now placed upstairs, well separated from the swimming pools- ostensibly to bring it 'nearer to the centre of the facility' but in fact recreating a problem that the current centre has: a level change and circulation of sauna users through the main lobby.

The main pool has been reduced in width by 1m, and crucially it is no longer a Sport England standard 6 lane community swimming pool, which was touted as one of the advantages of Option C over the existing arrangement. The learner pool and splash area have been squeezed markedly since Option C, which is inconsistent with the argument that the changes make the centre more family friendly. The total pool area in the application is only 70% of the current Victoria Leisure Centre facility, and yet the new facility is expected to attract much higher numbers of visitors, making overcrowding a real possibility.

In the developed Option C, screens were introduced to enable the pools to be separated from each other and to prevent overlooking from the lobby area and from the outside. These screens allowed the privacy for required for certain user groups, but they have been dropped from this proposal.

CONCLUSION

During its time of campaigning (1999 to present day) the Save Victoria Baths campaign has amassed a great deal of written and oral information pertaining to the Victoria Leisure Centre. Our main interest is the success of the Victoria Leisure Centre and the strengthening of the local community. One of our key campaign aims is to ensure that any investment provides a high quality, long-term and sustainable solution with the potential to service the east of the city for another 100 years to come.

We believe that the current proposal fails to deliver these aims and fails on many other counts; and we urge that the Development Control Committee be recommended to reject it.

MAT ANDERSON
SAVE VICTORIA BATHS CAMPAIGN GROUP
25TH MARCH 2010