

SPSF Environmental Audit Review

Detailed Report

MORETONHAMPSTEAD POOL

MORETONHAMPSTEAD SWIMMING
POOL

AUDITOR: Caroline Constantine

DATE: 31st January 2025

Quality Support in Safe Hands

Report Format

The Environmental Management Audit is part of the Sport England Swimming Pool Support Fund (SPSF). This audit reviews the environmental management, culture and awareness of the facility. The audit will provide an overall score and scores for each section (module) and question. An action plan will be provided as part of the audit report.

The Environmental Management Audit will include a tour of the facility (both customer facing and staff only areas) and a review of documentation including policies, procedures and training.

The auditor will provide ideas and suggestions to help the facility management to drive down energy consumption and improve sustainability.

The information within this report will assist you in setting environmental priorities and create action plans.

Performance/Scoring

The scoring is based on the following guidelines:

0	Major Non-Conformity - Very little in place or being actioned. The absence or total breakdown of a system to meet the requirements of the EMS. Several minor non-conformities against one requirement can represent a total breakdown of the system and thus be considered a major non-conformity	Urgent Action Recommended
1	Minor Non-Conformity - Non-compliance is not likely to result in the failure of the EMS or reduce its ability to ensure controlled processes or products. It may be a failure in some part of the EMS.	Action review required within 1 month
2	Opportunity for Improvement - Requirements are overall conformed to, however there is the potential to improve the process/practice/results.	Recommend Action within 3-6 months
3	Fully Compliant - Very good, with possibly one minor action required	Fully Compliant

During the visit, it is not possible to audit every area of the facility; therefore a sampling exercise is carried out to identify generally the effectiveness of the arrangements. N/A - this score will be used where the question is not relevant.

This Environmental Audit is a review of your organisation's environmental policies, systems and operational procedures. Our audits are conducted based on verbal, physical and written information provided by you at the time of the audit together with our enquiries and observations made during and within the scope of the audit. Audits are by nature a sampling exercise and therefore cannot guarantee to identify all possible breaches of legislation, non-compliance or good practice. Absence of comment on any issue should not be taken to imply compliance with legislation or standards.

Recommendations are given in good faith to promote and enhance environmental management in your business. We shall have no liability for any damage and/or harm caused by errors or omissions in any information or instructions provided by you in connection with this audit or you failing to inform us of a material change, which impacts the outcome of the audit.

OVERALL SUMMARY

ASSESSMENT TYPE

SPSF ENVIRONMENTAL AUDIT REVIEW

OVERALL

91%

EXECUTIVE SUMMARY

STRENGTHS

Thank you to Judith Denman, Miles Thompson and Robert Gofton for their time, openness and commitment to this audit review. So much work has been completed since the audit and the significant increase in score has demonstrated this hard work.

ACTION PLAN – AREAS FOR IMPROVEMENT

Management have made fantastic progress working through the actions on the SPSF Environmental Management Audit. Actions that remain outstanding are detailed in the report, along with any new actions.

OVERALL SUMMARY

OVERALL

91%

FACILITY PROFILE

25m x 12m pool, family changing facilities and kitchen.

CONTEXT OF VISIT

A Swimming Pool Support Fund (SPSF) Review was carried out on Teams with Judith Denman, Miles Thompson and Robert Gofton to review the progress made since the SPSF Environmental Management Audit on behalf of Sport England.

Right Directions

Quality Support in Safe Hands

OVERALL PERFORMANCE

MODULE

SCORE

Centre Observations (EMS)

89%

Policy and Planning (EMS)

94%

Staff Involvement (EMS)

100%

Leisure Operations (EMS)

100%

Maintenance (EMS)

78%

Environmental Emergencies (EMS)

100%

Measure and Review (EMS)

75%

OVERALL SCORE >

91%

ENVIRONMENTAL - Centre Observations (EMS)

SCORE

89%

QUESTION	ACTION PLAN – AREAS FOR IMPROVEMENT	
Environmental factors are considered within the centre (general housekeeping)		100%
Environmental hazards are identified and suitably controlled		100%
Public awareness initiatives are in place	<p>Consideration could be given to creating a focal point within the facility. This could be done by displaying an environmental awareness notice board and sharing information such as recycling initiatives, energy performance data and facility-specific goals and targets to improve environmental performance.</p> <p>This may add value create a buy-in from customers on the initiatives currently in place, and demonstrate what impact such measures are achieving</p> <p>Numerous additional initiatives could be considered at the facility to further encourage customers to help drive down the carbon footprint of the centre, such as:</p> <ul style="list-style-type: none"> - Extracting the waste data from the council and turning it into tangible data which is then shared in public view can be a good way to help engage customers to support the recycling initiatives - Recycling with purpose (right place / right bins) promoting to customers. Signage and labels should be displayed on the bins - Swimming equipment recycling initiative - Commitment purpose/information - Website information on environmental awareness and initiatives - Transportation initiatives – use public transport/bikes etc and get £££ off - Informing customers of future initiatives and savings due at the facility such as the installation of solar panels, pool covers etc 	67%

QUESTION	STRENGTH
Environmental factors are considered within the centre (general housekeeping)	<p>Being an outdoor pool, natural daylight was being used instead of artificial lighting when appropriate.</p> <p>Borehole - treaded water which is used</p> <p>Electric - renewable supplier</p> <p>Air source heat pumps being used effectively</p> <p>40 solar panels</p> <p>1 single PV panel</p> <p>Improvement Made - a Display Energy Certificate (DEC) is not needed.</p> <p>Improvement Made - managing waste policy is in place.</p> <p>Improvement Made - management have collected waste collection data.</p> <p>Improvement Made - a single use plastic audit has been completed.</p> <p>Improvement Made - reviewing the recycling waste and will be recording waste.</p> <p>Improvement Made - the environmental policy and key objectives have been fully embedded amongst the team, management have written some excellent SMART targets.</p>
Environmental hazards are identified and suitably controlled	<p>Microbiological testing completed - C&M water limited - renewed yearly</p> <p>Improvement made - new environmental checklist has been devised and will be completed during the summer season.</p>
Public awareness initiatives are in place	<p>During the audit, it was discussed that the facility does have recycling bins within the facility</p> <p>Showers are on push button short timings</p> <p>Patrons usually walk or cycle to the facility</p> <p>Improvement made - the environmental policy and key objectives are being displayed.</p>

ENVIRONMENTAL - Policy and Planning (EMS)

SCORE

94%

QUESTION	ACTION PLAN – AREAS FOR IMPROVEMENT	
An Environmental Policy is in place		100%
An Aspects and Impacts Assessment and Register are in place		100%
Environmental procedures are in place	<p>Further consideration could be given to implementing environmental policies that may be beneficial such as:</p> <ul style="list-style-type: none"> - Waste Management Policy. - Lighting Policy. - Heating. - Management of utility consumption. <p>Implementing an Environmental Management System may be beneficial to assist with the environmental procedures, form checklists and links to industry guidance and relevant legislation.</p>	67%
The centre has defined environmental objectives/targets		100%
An Environmental Improvement Plan is in place		100%
Contractors and suppliers are assessed for 'green' credentials	Management may wish to consider implementing a process to formally capture and record that contractors and suppliers have been assessed for the green credentials as part of their procurement process.	100%

QUESTION	STRENGTH
An Environmental Policy is in place	Improvement made - a comprehensive environmental policy, has been written and signed and dated.
An Aspects and Impacts Assessment and Register are in place	Improvement made - an Aspects and Impacts Register has been written.
Environmental procedures are in place	Improvement made: A Waste Management Policy, Environmental Policy and a Contractors Management process have been introduced.
The centre has defined environmental objectives/targets	Improvement made - objectives and targets are in place. Management and the trustees are fully aware of the objectives.
An Environmental Improvement Plan is in place	<p>The team discussed several ongoing ways to improve the facility and were aware of the importance of an Environmental Improvement Plan (EIP) - It provides a clear framework for identifying, prioritizing, and implementing environmental initiatives, ensuring systematic and organized progress toward sustainability goals. An EIP will also help the pool stay compliant with environmental laws and regulations, reducing the risk of fines, penalties, and legal issues.</p> <p>Improvement made - a environmental improvement plan is now in place.</p>
Contractors and suppliers are assessed for 'green' credentials	<p>With regards to 'everyday' suppliers such as food products, cleaning supplies and pool chemicals there was a real focus by the organisation to use local suppliers.</p> <p>Chemicals are sourced from local towns.</p> <p>Food goods are also locally sourced.</p>

ENVIRONMENTAL - Staff Involvement (EMS)

SCORE

100%

QUESTION	ACTION PLAN – AREAS FOR IMPROVEMENT	
There is an Environmental Champion/Competent Person in place		100%
Staff have received environmental awareness training		100%
Internal communication to staff regarding environmental management is embedded in the centre processes	<p>Some suggested ideas for the staff notice board could be:</p> <ul style="list-style-type: none"> - Legislation changes - Next training session - Environmental and Energy Action Plan targets/ achievements - Minutes of relevant meetings - Staff Environment Pledges - Topic on the month posters - Why good housekeeping is important – energy facts - Environmental Monthly Newsletter - Analysis of utility readings and the effectiveness of environmental strategy - Who to contact if there is an energy-efficient idea or concern 	100%

QUESTION	STRENGTH
There is an Environmental Champion/Competent Person in place	Kerry is the Environmental Champion is given the time and resources to fulfil the requirements of their role.
Staff have received environmental awareness training	<p>Environmental working practices are included in the induction.</p> <p>Improvement made - training has been completed by the trustees.</p>
Internal communication to staff regarding environmental management is embedded in the centre processes	Improvement made - management have put processes in place to inform staff at the start of the season of the environmental procedures and improvements introduced since the SPSF audit.

ENVIRONMENTAL - Leisure Operations (EMS)

SCORE

100%

QUESTION	ACTION PLAN – AREAS FOR IMPROVEMENT	
Waste management processes are in place		100%
Hazardous waste is disposed of responsibly	<p>Management may wish to consider that sanitary waste should be disposed of in an environmentally friendly manner by using specialized waste treatment facilities or sanitary waste incineration. This can help minimise the environmental impact of sanitary waste disposal.</p> <p>New AFI - could the pool partner with a local business for the disposal of nappies and sanitary waste.</p>	100%
Discharge consents to water courses or sewers are in place (swimming pools only)	The site cannot provide any evidence as to discharge consent. A discharge consent is normally required for a facility with a swimming pool and should include compositional details of the effluent, the quantity to be discharged in one day, and the highest proposed level/ velocity of discharge.	NAN%
A single use plastics policy is in place		100%
Harmful substances (COSHH) are well managed		100%
Noise levels have been assessed and are controlled		100%
Lighting and lux levels have been considered and assessed		NAN%
Tasks that include environmental risks have written work instructions / procedures		100%

QUESTION	STRENGTH
Waste management processes are in place	Improvement made - Management have introduced a waste management procedure. Waste is considered within the improvement plan.
Hazardous waste is disposed of responsibly	Improvement made - Sanitary bins are in place.
Discharge consents to water courses or sewers are in place (swimming pools only)	Improvement made - the team have spoken to the environmental health department who have confirmed that discharge consent is not required. Less than 5 cubic metres is the limit and the team are going to time backwashes to ensure they do not breach the regulations. The NOP has been updated.
A single use plastics policy is in place	<p>Improvement Made - staff have refillable water bottles.</p> <p>Improvement Made - a single use plastic policy is within the managing waste procedure.</p>
Harmful substances (COSHH) are well managed	<p>COSHH sheets were provided as evidence on the day of the audit.</p> <p>Improvement made - cleaning products are all environmentally friendly and bought in bulk.</p>
Noise levels have been assessed and are controlled	Noise risk assessment has been completed.
Lighting and lux levels have been considered and assessed	Improvement Made - there are minimal lights in the building.
Tasks that include environmental risks have written work instructions / procedures	<p>Improvement Made - management have updated the NOP and EAP.</p> <p>Improvement Made - management have procedures on plant room operations.</p>

ENVIRONMENTAL - Maintenance (EMS)

SCORE

78%

QUESTION	ACTION PLAN – AREAS FOR IMPROVEMENT	
Air temperatures are managed and monitored		100%
Air handling / conditioning units and refrigeration units are serviced and tested	There are no AHU and/or A/C units.	NAN%
Mechanical systems – schematics are available	We suggest the facilities should have up-to-date copies of mechanical services schematics, which identify flow rates and design temperatures for the following: <ul style="list-style-type: none">- Pool hall ventilation- All other mechanical ventilation systems- Low-temperature water heating systems- Pool water filtration systems- Waste and surface water drainage.	33%
There is / are Building Management System (BMS) trained staff available	There is no Building Management System (BMS) in the facility.	NAN%
Planned Preventative Maintenance Schedules are in place		100%

QUESTION	STRENGTH
Air temperatures are managed and monitored	Pool temp maintained at 27Oc. Pool water is tested every 2 hours.
Planned Preventative Maintenance Schedules are in place	A PPM is in place, up to date and reviewed for effectiveness regularly.

ENVIRONMENTAL - Environmental Emergencies (EMS)

SCORE

100%

QUESTION

ACTION PLAN – AREAS FOR IMPROVEMENT

Emergency planning procedures are in place

100%

Environmental incidents, accidents, near misses and complaints are logged

100%

QUESTION

STRENGTH

Emergency planning procedures are in place

Improvement made - a comprehensive Emergency Action Plan is in place with the addition of failed pool water microbiological tests (E-coli or cryptosporidium), and legionella detected in the water system.

Environmental incidents, accidents, near misses and complaints are logged

An accident and incident book is completed by staff and necessary actions are taken by trustees.

Improvement made - management would log environmental incidents on an incident log.

ENVIRONMENTAL - Measure and Review (EMS)

SCORE

75%

QUESTION	ACTION PLAN – AREAS FOR IMPROVEMENT	
Management are aware of the energy and water consumption of their centre		100%
Environmental internal or external monitoring takes place		67%
Management review environmental performance	<p>Whilst energy consumption is rightly a priority, it does not cover the whole scope of the site's environmental impacts. Consider adding waste and chemical consumption to the review process.</p> <p>Unable to evidence management reviews of environmental performance on the day of the audit. Suggest recording any reviews of environmental performance for reference going forward.</p>	67%
Environmental achievements are recognised	New AFI - consider PR on consumption and initiatives.	67%
Potential environmental savings / initiatives	<ul style="list-style-type: none"> - LED Lighting: Replacement of existing lighting with LED fixtures will significantly reduce energy consumption - Daytime Lighting: Turning off lights during daytime hours will capitalize on natural light, further reducing energy use. - Variable Speed Drives: Installation of variable speed drives will help optimize energy usage, allowing kilowattage to be converted into carbon savings data - Additional lagging on domestic hot water pipes, insulating filters and providing a 'jacket' for the heat exchanger will help to improve energy efficiency - Consideration could be given to the use of ultraviolet disinfection on the swimming pool filtration systems. The use of these systems would allow the team to reduce the need for higher chlorine set points and reduce the amount of chemicals used in the pools - A 'low-cost initiative' in 'older buildings', any toilet cisterns installed before 1 January 2001 will benefit from a hippo bag being installed to reduce up to 3 litres per flush. 	NAN%

QUESTION	STRENGTH
Management are aware of the energy and water consumption of their centre	<p>Monthly utility readings were completed and shared with the board of trustees.</p> <p>Smart meters were installed for gas and electricity.</p> <p>Improvement made - electricity and water is log on spreadsheet - monthly.</p>
Environmental internal or external monitoring takes place	Improvement Made - management are completing Environmental Checks.
Management review environmental performance	Improvement Made - management are discussing energy consumption with the trustees.
Environmental achievements are recognised	<p>The team explained that there are several other projects in the pipeline including the possible installation of more photo-voltaic panels and how to minimise waste at the centre, as part of the road to Net Zero.</p> <p>The management team are very conscientious and aware of the environmental intricacies of the facility. They know the operations extremely well.</p>
Potential environmental savings / initiatives	<p>The air source heat pump is in use and being used effectively.</p> <p>PV solar panels have been requested and should be installed by the end of October.</p> <p>Pool cover will be in place soon and ready for next season.</p>

ACTION PLAN – AREAS FOR IMPROVEMENT

MODULE	TASK / ACTION REQUIRED	PRIO. RATING
Measure and Review (EMS)	New AFI - consider PR on consumption and initiatives.	67%
Measure and Review (EMS)	<p>Whilst energy consumption is rightly a priority, it does not cover the whole scope of the site's environmental impacts. Consider adding waste and chemical consumption to the review process.</p> <p>Unable to evidence management reviews of environmental performance on the day of the audit. Suggest recording any reviews of environmental performance for reference going forward.</p>	67%
Measure and Review (EMS)	<ul style="list-style-type: none"> - LED Lighting: Replacement of existing lighting with LED fixtures will significantly reduce energy consumption - Daytime Lighting: Turning off lights during daytime hours will capitalize on natural light, further reducing energy use. - Variable Speed Drives: Installation of variable speed drives will help optimize energy usage, allowing kilowattage to be converted into carbon savings data - Additional lagging on domestic hot water pipes, insulating filters and providing a 'jacket' for the heat exchanger will help to improve energy efficiency - Consideration could be given to the use of ultraviolet disinfection on the swimming pool filtration systems. The use of these systems would allow the team to reduce the need for higher chlorine set points and reduce the amount of chemicals used in the pools - A 'low-cost initiative' in 'older buildings', any toilet cisterns installed before 1 January 2001 will benefit from a hippo bag being installed to reduce up to 3 litres per flush. 	NAN%
Centre Observations (EMS)	<p>Consideration could be given to creating a focal point within the facility. This could be done by displaying an environmental awareness notice board and sharing information such as recycling initiatives, energy performance data and facility-specific goals and targets to improve environmental performance.</p> <p>This may add value create a buy-in from customers on the initiatives currently in place, and demonstrate what impact such measures are achieving</p> <p>Numerous additional initiatives could be considered at the facility to further encourage customers to help drive down the carbon footprint of the centre, such as:</p> <ul style="list-style-type: none"> - Extracting the waste data from the council and turning it into tangible data which is then shared in public view can be a good way to help engage customers to support the recycling initiatives - Recycling with purpose (right place / right bins) promoting to customers. Signage and labels should be displayed on the bins - Swimming equipment recycling initiative - Commitment purpose/information - Website information on environmental awareness and initiatives - Transportation initiatives – use public transport/bikes etc and get £££ off - Informing customers of future initiatives and savings due at the facility such as the installation of solar panels, pool covers etc 	67%
Maintenance (EMS)	There are no AHU and/or A/C units.	NAN%
Maintenance (EMS)	<p>We suggest the facilities should have up-to-date copies of mechanical services schematics, which identify flow rates and design temperatures for the following:</p> <ul style="list-style-type: none"> - Pool hall ventilation - All other mechanical ventilation systems - Low-temperature water heating systems - Pool water filtration systems - Waste and surface water drainage. 	33%
Maintenance (EMS)	There is no Building Management System (BMS) in the facility.	NAN%
Leisure Operations (EMS)	The site cannot provide any evidence as to discharge consent. A discharge consent is normally required for a facility with a swimming pool and should include compositional	NAN%

	details of the effluent, the quantity to be discharged in one day, and the highest proposed level/ velocity of discharge.	
Leisure Operations (EMS)	<p>Management may wish to consider that sanitary waste should be disposed of in an environmentally friendly manner by using specialized waste treatment facilities or sanitary waste incineration. This can help minimise the environmental impact of sanitary waste disposal.</p> <p>New AFI - could the pool partner with a local business for the disposal of nappies and sanitary waste.</p>	100%
Policy and Planning (EMS)	<p>Further consideration could be given to implementing environmental policies that may be beneficial such as:</p> <ul style="list-style-type: none"> - Waste Management Policy. - Lighting Policy. - Heating. - Management of utility consumption. <p>Implementing an Environmental Management System may be beneficial to assist with the environmental procedures, form checklists and links to industry guidance and relevant legislation.</p>	67%
Policy and Planning (EMS)	Management may wish to consider implementing a process to formally capture and record that contractors and suppliers have been assessed for the green credentials as part of their procurement process.	100%
Staff Involvement (EMS)	<p>Some suggested ideas for the staff notice board could be:</p> <ul style="list-style-type: none"> - Legislation changes - Next training session - Environmental and Energy Action Plan targets/ achievements - Minutes of relevant meetings - Staff Environment Pledges - Topic on the month posters - Why good housekeeping is important – energy facts - Environmental Monthly Newsletter - Analysis of utility readings and the effectiveness of environmental strategy - Who to contact if there is an energy-efficient idea or concern 	100%