

READING BOROUGH COUNCIL

REPORT BY EXECUTIVE DIRECTOR OF ECONOMIC GROWTH AND  
NEIGHBOURHOOD SERVICES

TO:	STRATEGIC ENVIRONMENT, PLANNING AND TRANSPORT COMMITTEE		
DATE:	16 MARCH 2020	AGENDA ITEM:	12
TITLE:	ADOPTION OF THE PALMER PARK DEVELOPMENT FRAMEWORK		
LEAD COUNCILLOR:	COUNCILLOR PAGE	PORTFOLIO:	STRATEGIC ENVIRONMENT, PLANNING AND TRANSPORT PARK
SERVICE:	PLANNING	WARDS:	
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**1. EXECUTIVE SUMMARY**

- 1.1 This report relates to the proposed adoption of the Palmer Park Development Framework as a Supplementary Planning Document, for use in determining planning applications within the area. The Development Framework sets out proposals for improvement of Palmer Park, in particular the development of a new swimming pool, and supplements policy in the recently adopted Reading Borough Local Plan.
- 1.2 A Draft Palmer Park Development Framework was approved for consultation by this Committee on 21<sup>st</sup> November 2018 (Minute 22 refers). Consultation took place between December 2018 and February 2019, and a total of 64 responses were received. A Statement of Consultation summarising the process and the responses is included. A revised version of the Framework has now been prepared, taking account of the responses received. Committee is recommended to formally adopt this.
- 1.3 Appendices  
Appendix 1 - Equality Impact Assessment  
Appendix 2 - Statement of Consultation  
Appendix 3 - Palmer Park Development Framework

**2. RECOMMENDED ACTION**

- 2.1 That the results of the consultation on the Draft Palmer Park Development Framework, undertaken between December 2018 and February 2019, as set out in the Consultation Statement at Appendix 2, be noted.
- 2.2 That the Palmer Park Development Framework (Appendix 3) be adopted as a Supplementary Planning Document.

### 3. POLICY CONTEXT

- 3.1 Palmer Park is an important green space serving East Reading as amenity and recreational space. The athletics stadium and velodrome have, as sporting venues, more regional and county wide importance. The park also serves as a location for local events such as fun fairs, circus and charity fundraising events. Whilst the park has a number of well used facilities, there are a number of underused elements, particularly in the central zone. These have the potential to become attractive, vibrant spaces and successful facilities.
- 3.2 The new Reading Borough Local Plan identifies site ER1j, covering the Palmer Park car park, stadium and access road, for leisure use including a swimming pool. The Local Plan was formally adopted at Council on 4<sup>th</sup> November 2019, and the Palmer Park site is now therefore allocated for this use. There is therefore an opportunity to provide more detail on how this allocation is to be delivered, as well as looking more generally on how the park as a whole can be improved. A Supplementary Planning Document (SPD) would be required to achieve these objectives.
- 3.3 Policy Committee on 20th January made the decision to award the 25 year design, build, operate and maintain contract for Boroughwide leisure facilities to Bidder A, GLL. This included the provision of new leisure facilities including a swimming pool at Palmer Park. Committee decided that this should include the variant bid for provision of a 6-lane pool at Palmer Park. It is proposed that the new swimming pool at Palmer Park open in Spring 2022. A Development Framework, with SPD status, helps to provide certainty about the form of development that will be acceptable in this location and therefore reduce risk.

### 4. THE PROPOSAL

#### (a) Current Position

- 4.1 This committee approved the Draft Palmer Park Development Framework for consultation on 21st November 2018 (Minute 22 refers). The Framework considered the future of Palmer Park, in particular the inclusion of a new swimming pool. In particular, the draft Framework considered two options for location of the new pool. Option 1 was adjacent to the stadium building, whilst Option 2 was in front of the

stadium building. Both options resulted in loss of some of the open space to accommodate car parking.

4.2 Consultation was undertaken between 14th December and 22nd February, a total of ten weeks, and this included a consultation event held at Palmer Park stadium on 15th January.

4.3 A total of 64 written responses were received. The main points raised are summarised below.

- Support for Option 1 (raised by 22 respondents)—Respondents found Option 1 to be the most aesthetically pleasing and found it less intrusive than Option 2. Some noted that it best facilitated pedestrian flows, with the entrance visible and accessible for park users either on foot or by car.
- Preference for a 50 metre pool (raised by 18 respondents)—Respondents argued that a 50 metre pool would make Reading more attractive for competitive events and serve a wide range of swimmers (old and young, elite and beginner) with better value for money. A 50 metre pool could accommodate a wider variety of activities, both leisure and sport, and compete with nearby facilities in other authorities. Some also called for the inclusion of diving facilities.
- Support for improvements to the park's character and paths (raised by 13 respondents)—Respondents noted that the Park was in need of investment because its quality has deteriorated over the years. Respondents support improvements to paths, signage, landscaping, facilities for users with disabilities, seating, lighting and the setting of the George Palmer statue.
- Support for the new pool on this site, as opposed to elsewhere in the Borough (raised by 12 respondents)—Respondents expressed support for the construction of a new pool at Palmer Park and noted its excellent public transport links.
- Opposition to the loss of green open space (raised by 11 respondents)—Respondents were opposed to the loss of green open space due to an extended car park. Many stated that this important area is well-used for informal activities and that an extended car park will be an eyesore for nearby residents.
- Not enough car parking is proposed by either option (raised by 11 respondents)—Respondents stated that the current car park is often full and that adding a pool on-site will increase demand drastically. Some nearby residents expressed frustration that park users' cars 'spill' into the surrounding streets and take up limited on-street residents parking.

- Concern the East Reading Adventure Play Area (ERAPA) with accessible play equipment will be removed (raised by 8 respondents)—Respondents expressed concern at the suggestion that the ERAPA would be lost over time or consolidated with other play areas in the Park. Respondents noted that the ERAPA is well-used and that it is the best example of accessible play equipment on offer in the Borough.
- Concern that the new pool will be too close to the newly refurbished Bulmershe Leisure Centre Pool (raised by 7 respondents)—Respondents questioned whether or not a new 25 metre pool at Palmer Park will be viable when the new pool at Bulmershe is opened nearby.
- Concern that there is no local support for a new 25 metre pool on this site (raised by 7 respondents)—Respondents claimed that there is little support for a 25 metre pool at Palmer Park and stated that many residents would prefer either a 50 metre pool or a different site altogether.
- Footpaths are poorly lit throughout the Park (raised by 6 respondents)—Respondents feel that the park is unsafe at night and that this discourages users (particularly women) and encourages some users to drive instead.
- Consultation process has been insufficient (raised by 6 respondents)—Respondents feel that the consultation process was not publicised widely enough and/or that the drop-in event was held at the wrong time and in too small a space. Some felt that the consultation document did not provide enough detail, particularly with regard to leisure facilities. Some felt that more site options should have been appraised.
- There should be no increase in the amount of car parking provided (raised by 6 respondents)—Some strongly opposed the addition of any new car parking. Respondents stated that the Council should be encouraging users to walk, take the bus or cycle instead since surrounding roads are congested and may contribute to poor air quality.

#### 4.4 The following points were also raised, albeit by fewer respondents:

- The framework should include cycle parking.
- Parking closer to the bowling green is needed for members of the Bowling Club.
- Use of the Park's facilities (including car parking, the sports centre and the circular path) should not be disrupted during construction.
- Anti-social behaviour and safety in the area must be addressed.
- A pool should accommodate a wide variety of activities.
- A wider appraisal is needed to consider all possible sites.

- Facilities and surfaces should be appropriate for users with disabilities (including parking, changing places, accessible toilets, play area surfaces, etc.)
- A pedestrian path should be included along the main vehicle entrance.
- The park cannot support two cafés.
- Informal sports fields (particularly to the south of the stadium) should not be disrupted by re-instating a historic path or new car parking.
- Public toilets are needed and should be accessible for all.
- Support for the “green” car park.
- Future maintenance must be addressed.
- The library should be better integrated with the rest of the park.

4.5 A full Statement of Consultation, detailing the consultation measures and the responses received, is included as Appendix 2.

(b) Option Proposed

4.6 Committee is recommended to adopt the revised version of the Palmer Park Development Framework. The version to be adopted is Appendix 3 to this paper. Once adopted, the Palmer Park Development Framework will be used to supplement the Local Plan for the determination of planning applications within the park.

4.7 Committee is also recommended to approve the recommended responses to representations made on the draft document. These are contained in Appendix 1 of the Statement of Consultation on the Draft Palmer Park Development Framework (at Appendix 2 to this report).

4.8 The main changes that have been made to the Development Framework compared to the version that was consulted upon are summarised below:

- Whereas the consultation draft set out two options for location of the pool, the adoption version centres around Option 1 as a preference, with the pool being located as an extension to the side of the stadium building.
- A specific section is included on car parking setting out information on how this will be considered. The amount of green space that would be lost to car parking has been reduced by reconfiguring the car park and the heart space, and proposals for coach parking and drop-off, and cycle parking are also now included. However, ultimately, the amount of car parking to be provided will be dependent on a Transport Assessment at application stage, which will have an effect on the amount of space available for the heart space and/or the amount of green space within the park to be used for car parking. This is reflected in the text of the Framework.

- The Framework no longer refers to any proposal for removal of the ERAPA accessible play equipment in the north of the park. It also makes reference for the need for the pool to be accessible to all.
- Some responses wanted greater clarity on why the proposed option was chosen over alternative locations. A summary setting out why this is the case is now included as an appendix.
- An enhanced policy context section has been included to make the relationship with the Local Plan policy clearer.
- There are further references to planting, trees and biodiversity throughout the document.

(c) Other Options Considered

- 4.9 There are two alternative options to the proposed option above. They are: (i) to base the Development Framework around an alternative location for the swimming pool; and (ii) not to proceed with a Development Framework for the area.
- 4.10 The Development Framework contains Appendix A, which details why alternative locations within the park, and other East Reading locations more generally, were not taken forward as locations for a new pool. In more general terms, the broad location of the pool was defined by the allocation within the Local Plan, and a SPD cannot make new policy to locate the pool outside the allocated site.
- 4.11 Not to proceed with a Development Framework would miss the opportunity to set out policies and proposals for the improvement of the park, and could mean that any improvements are more ad-hoc and less co-ordinated. It would also fail to give certainty in developing proposals for a new swimming pool that emerge from the leisure procurement exercise.

## 5. CONTRIBUTION TO STRATEGIC AIMS

- 5.1 Adoption of the Development Framework will guide future development of the site in a way that will contribute to achieving the Council's priorities as set out in the Corporate Plan through:
- Keeping Reading's environment clean, green and safe;
  - Promoting great education, leisure and cultural opportunities for people in Reading.

## 6. ENVIRONMENTAL AND CLIMATE IMPLICATIONS

- 6.1 Improving the environment of Palmer Park is a significant element of the Development Framework, and this includes proposals for new planting and creation of gardens within the park. The proposals within the Development Framework seek to minimise any loss of open space to

accommodate the new pool and associated parking, and the environmental implications of specific proposals will need to be considered at planning application stage.

- 6.2 A new building will be expected to meet the high levels of sustainability set out in Policy CC2 of the Local Plan. For a major development (i.e. over 1,000 sq m) this will mean meeting Building Research Establishment Environmental Assessment Method (BREEAM) Excellent standards, whilst for a minor development BREEAM Very Good will be required. Achieving this standard will be more challenging in relation to an extension to an existing building and if these cannot be met, the highest possible levels of sustainability will be required.
- 6.3 At Policy Committee in January 2020, the Council agreed to enter into a design, build, operate and maintain contract with GLL which would include the delivery of a new community pool at Palmer Park linked to existing facilities. GLL have committed to developing the new pool at Palmer Park to BREEAM Excellent standards and their tender submission sets out an initial pre-assessment document for obtaining BREEAM Excellent accreditation. GLL has also committed to use some renewables to achieve building control compliance, as well as to consider a full range of renewables and committed to focus on a number of measures which will help to reduce carbon emissions and improve environmental efficiency.
- 6.4 The site is in a highly sustainable location and is easily served by a choice of means of travel other than the car. It is located close to a bus stop on the high-frequency 17 bus route. A cycle route also passes along Wokingham Road, and the Framework includes a requirement for cycle parking. The location is also accessible on foot from much of east Reading.

## **7. COMMUNITY ENGAGEMENT AND INFORMATION**

- 7.1 Community involvement on the Draft Palmer Park Development Framework took place between 14<sup>th</sup> December 2018 and 22<sup>nd</sup> February 2019, a period of ten weeks. Paragraphs 4.2 to 4.5 of this report summarise the consultation process already undertaken, and this is set out in more detail in the Statement of Consultation in Appendix 2. The community involvement stages were undertaken in line with the Statement of Community Involvement (adopted March 2014).

## **8. EQUALITY ASSESSMENT**

- 8.1 The Scoping Assessment, included at Appendix 1 identifies that an Equality Impact Assessment (EqIA) is relevant to this SPD. The EqIA (also at Appendix 1) identifies that, where there are identified impacts upon specific groups, these are expected to be positive. Compliance with the duties under S149 of the Equality Act 2010 can involve treating some persons more favourably than others, but it is not considered that there

will be a negative impact on other groups with relevant protected characteristics.

## **9. LEGAL IMPLICATIONS**

- 9.1 Regulation 12 and 13 of the Town and Country Planning (Local Planning) (England) Regulations 2012 set out the requirements for undertaking consultation on SPDs. Regulation 14 sets out the requirements for adoption. The production of and consultation on the Framework are in compliance with the requirements under the Regulations.

## **10. FINANCIAL IMPLICATIONS**

- 10.1 The work undertaken on drafting the documents and the expenditure on community engagement has been funded from existing budgets.
- 10.2 The proposals set out in the Framework require significant funds to fully realise, including the significant investment required to deliver a new pool facility. The funding for provision of leisure facilities including a pool was considered as part of the decision on the design, build, operate and maintain contract for leisure facilities which was made at Policy Committee on 20<sup>th</sup> January. The Framework is a planning document to guide development; while funding could come from a number of sources including the Council, it is anticipated that a clear, adopted masterplan for the park would be helpful in seeking external funding should sources become available in the future.

### Value for Money (VFM)

- 10.3 The preparation of a framework will ensure that future development proposals are appropriately guided and that significant effects are mitigated and that harmful effects are minimised. Production of a Supplementary Planning Document for Palmer Park is in line with best practice and therefore represents good value for money.

### Risk Assessment

- 10.4 There are no direct financial risks associated with the adoption of the Palmer Park Development Framework.

## **11. BACKGROUND PAPERS**

- The Town and Country Planning (Local Planning) (England) Regulations 2012
- Draft Palmer Park Development Framework, December 2018
- Adopted Local Plan, November 2019



## APPENDIX 1: EQUALITY IMPACT ASSESSMENT

### Provide basic details

**Name of proposal/activity/policy to be assessed:**

Palmer Park Development Framework

**Directorate:** DEGNS - Directorate of Economic Growth and Neighbourhood Services

**Service:** Planning

**Name:** Mark Worringham

**Job Title:** Planning Policy Team Leader

**Date of assessment:** 02/10/2019

### Scope your proposal

**What is the aim of your policy or new service?**

To set out proposals for improvements to Palmer Park, including provision of a new swimming pool.

**Who will benefit from this proposal and how?**

The East Reading communities served by the park will benefit through provision of improved leisure and recreation facilities.

**What outcomes will the change achieve and for whom?**

The adoption of the Development Framework as Supplementary Planning Document will allow improvements to the park to provide additional and enhanced leisure and recreation facilities, for East Reading residents, and, in the case of facilities with wider importance, for residents of a wider area.

**Who are the main stakeholders and what do they want?**

Local residents - a park with a continued and enhanced recreation role, which provides important green space in this part of Reading, high quality and diverse recreational facilities and which reflects the historic role of the park.

Sporting clubs and groups - high quality, well maintained sports facilities that can be easily accessed.

Council's leisure service and leisure partner - a Framework which gives certainty for how required new facilities will be delivered.

### Assess whether an EIA is Relevant

How does your proposal relate to eliminating discrimination; promoting equality of opportunity; promoting good community relations?

Do you have evidence or reason to believe that some (racial, disability, gender, sexuality, age and religious belief) groups may be affected differently than others? (Think about your monitoring information, research, national data/reports etc)

Yes  No

Is there already public concern about potentially discriminatory practices/impact or could there be? Think about your complaints, consultation, feedback.

Yes  No

If the answer is **Yes** to any of the above you need to do an Equality Impact Assessment.

If **No** you **MUST** complete this statement

An Equality Impact Assessment is not relevant because: N/A

### Assess the Impact of the Proposal

Your assessment must include:

- **Consultation**
- **Collection and Assessment of Data**
- **Judgement about whether the impact is negative or positive**

#### Consultation

Relevant groups/experts	How were/will the views of these groups be obtained	Date when contacted
Park users, local residents, community and voluntary groups, local businesses, relevant developers and landowners, infrastructure providers, statutory consultees	Consultation involved notifying consultees of the documents, publication on the website, availability in Civic offices and Palmer Park library, and a specific consultation event held at Palmer Park Stadium. See Statement of Consultation (Appendix 2).	November 2018 - February 2019

#### Collect and Assess your Data

**Describe how could this proposal impact on Racial groups**

The East Reading community is among the most ethnically diverse in Reading, and improvements to the park will therefore have a positive effect on those racial groups present.

Impacts are therefore expected to be positive.

**Is there a negative impact?** Yes  No  Not sure

**Describe how could this proposal impact on Gender/transgender (cover pregnancy and maternity, marriage)**

No specific impacts are identified.

**Is there a negative impact?** Yes  No  Not sure

**Describe how could this proposal impact on Disability**

There has been concern arising through the consultation about how the proposals could impact on disability. This is in relation to two elements in particular: the accessible ERAPA play equipment in the north of the park, and the accessibility of the new pool to people with disabilities.

The Draft Framework referenced removal of the ERAPA equipment, and wider consolidation of play equipment more generally. There was substantial concern about this, and the Council received a petition on this matter (separately to the consultation). However, these references have been removed from the final version for adoption.

The version for adoption makes clear that all facilities are to be fully accessible and meet latest best practice, including changing places.

Impacts are therefore expected to be positive.

**Is there a negative impact?** Yes  No  Not sure

**Describe how could this proposal impact on Sexual orientation (cover civil partnership)**

No specific impacts are identified.

**Is there a negative impact?** Yes  No  Not sure

**Describe how could this proposal impact on Age**

No specific impacts are identified.

**Is there a negative impact?** Yes  No  Not sure

**Describe how could this proposal impact on Religious belief?**

There is a particular diversity of religious belief in the East Reading community, and improvements to the park will therefore have a positive effect on religious groups present.

There is a small, informal car park at the southern extent of the park, which is primarily used as a car park for the Park United Reformed Church, but the Development Framework does not propose to alter this car park.

Impacts are therefore expected to be generally positive.

**Is there a negative impact?** Yes  No  Not sure

### Make a Decision

Tick which applies

1. **No negative impact identified** Go to sign off

2. **Negative impact identified but there is a justifiable reason**

You must give due regard or weight but this does not necessarily mean that the equality duty overrides other clearly conflicting statutory duties that you must comply with.

**Reason**

**3. Negative impact identified or uncertain**

**What action will you take to eliminate or reduce the impact? Set out your actions and timescale?**

**How will you monitor for adverse impact in the future?**

Any development proposals will be judged against the Development Framework at planning application stage, and this will include, for instance, whether the accessibility of the pool accords with the statements in the Framework.

Signed (completing officer)	Mark Worringham	Date: 2 <sup>nd</sup> October 2019
Signed (Lead Officer)	Mark Worringham	Date: 2 <sup>nd</sup> October 2019