

1st December 2020

REF: GLL1001

Development Management
Reading Borough Council
Civic Offices
Bridge Street
Reading
RG1 2LU

Dear Sir/Madam

Town and Country Planning (Environmental Impact Assessment) Regulations 2017: Request for Screening Opinion Pursuant to Regulation 6 in connection with the proposed construction of a replacement Rivermead Leisure Centre complex and subsequent demolition of the existing leisure centre complex

I write on behalf of our client my client Greenwich Leisure Limited (GLL) to formally request the adoption of a Screening Opinion pursuant to Regulation 6 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (hereafter referred to as 'the Regulations') in respect of the proposed development at Richfield Avenue, Reading, RG1 8EQ.

This request relates to a proposed development which will be subject to a formal planning application in due course, and is described in summary as:

“construction of a replacement Rivermead Leisure Centre complex with associated access, parking, drainage, hard and soft landscaping, refuse and recycling facilities on the car park of the existing leisure centre off Richfield Avenue; and subsequent demolition of the existing Rivermead Leisure Centre complex and formation of a replacement car park”

Regulation 6(2)(b) requires a screening request to be accompanied by a description of the development, including the physical characteristics of the development and the location of the development with regards to the environmental sensitivity of the geographical areas that are likely to be affected. This letter provides the necessary information to confirm, in our opinion, an Environmental Impact Assessment (EIA) is not required in this case and to enable the Council to issue a formal Screening Opinion.

The Application Site

The Rivermead Leisure Centre is located to the north and west of Reading city centre, at the eastern end of Rivermead Park which is located on the south bank of the River Thames and to the north of Richfield Avenue. The leisure centre and its car park are both accessed off of Richfield Avenue which lies adjacent to the southern boundary of the site. The site is located 960 metres north-west of Reading's central train station.

The site extends to some 5.25 hectares, with an area on 0.95 hectares being occupied by buildings, an area of 1.70 being occupied by car parking and access, with the rest in use as a play area, and hard and soft landscaping including cycle parking. The floodlit sports pitch; which is being retained in situ is located outside of the development's site area.

The site is relatively level with a very slight incline from Richfield Avenue up to the parkland to the north, rising from 38.60m above ordnance datum (AOD) to 39.00m AOD.

The leisure centre, it's car park and the land upon which it is situated is all owned by Reading Borough Council. The parkland that lies adjacent to the north of the leisure centre is designated as a Local Green

and Public Open Space, with the overall Rivermead Park being designated as a Major Landscape Feature. The riverside walk, associated parkland and Thames Promenade are also designated as Major Landscape Features.

The leisure centre complex is surrounded by a variety of urban uses, including:

- the Reading Rowing Club, on the bank of the River Thames to the east
- the Thameside Promenade public car park to the east
- the Premier Inn and Crowne Plaza hotels to the east
- a variety of commercial uses including a Mercedes car dealership and Genting Casino to the south
- the Caversham Bridge Garden Centre to the south-west
- a laser clay pigeon range to the west.

The site is currently configured with the main car park for the leisure centre situated to the east of the buildings and overflow car parks situated to the south along the frontage of Richfield Avenue.

The site can be conveniently accessed via good pedestrian, cycle, vehicular and public transport connections, including a bus stop located to serve the site, a main vehicular access serving the site is taken off Richfield Avenue and a variety of footpaths and shared pedestrian/cycle paths (including the R40 Cycle Route Network) providing connections to the surrounding residential neighbourhoods, Reading town centre and the train station. The site currently benefits from 12 cycle racks providing 24 cycle parking spaces. Reading Readibus also serves the leisure centre; this 'dial-a-ride' service provides transport around Reading for people with restricted mobility.

The Proposed Development

This request relates to the proposed replacement of the Rivermead Leisure Centre at Rivermead Park. The leisure centre was opened in 1988 and has served the community well for over 30 years. The buildings have exceeded their anticipated lifespan and reached the end of their economic life, therefore a replacement leisure centre has been proposed, and refurbishment has been discounted primarily on practical and economic grounds.

The proposed new replacement leisure centre will be constructed on the existing main car park to the east of the existing buildings. The existing leisure centre would remain operational until the replacement complex opens. Once the new facility opens, the redundant centre will be demolished and that part of the site will be laid out as a replacement car park.

A fuller description of the development is:

“construction of a replacement Rivermead Leisure Centre complex with associated access, parking, drainage, hard and soft landscaping, refuse and recycling facilities on the car park of the existing leisure centre off Richfield Avenue; and subsequent demolition of the existing Rivermead Leisure Centre complex and formation of a replacement car park, comprising:

- 25 metre, 8 lane competition swimming pool with part moveable floor
- teaching and diving pool with moveable floor
- splash pad with elements of play features
- 250 spectator seats for the pool hall
- a six court sports hall with spectators seating
- 120 station fitness suite
- studio space and spin studio
- café and seating area
- soft play area and party rooms
- wet and dry changing areas

- new entrance pavilion to retained training pool
- 188 car parking spaces and 144 cycle spaces”

The new leisure centre will continue to provide the traditional community facilities such as swimming, sports hall, multi-function space, but will be combined with new amenities to reflect the changing nature of sports and leisure. It is intended that diving will also be reintroduced within the new centre.

The continuity of leisure amenity provision at the site is to be retained whilst the new leisure centre is constructed, and the development will proceed on a phased basis to provide the community with uninterrupted access to sports facilities. The existing leisure centre will be fully operational whilst the new centre is constructed on land / overflow car parking to the south and east of the existing centre. Once the new leisure centre is completed, the existing centre will be demolished making way for new car parking. The existing demountable pool will be retained, and a small entrance pavilion will be provided.

The proposed development has been subject to recent pre-application discussions with Reading Borough Council under application reference: 200153/PREAPP and will form the subject of a formal planning application in due course.

Determining whether Environmental Impact Assessment (EIA) is required

The determination for whether an assessment is required rests in the consideration of whether the development is:

- Schedule 1 development – in which case EIA is necessary, or
- Schedule 2 development – in which case EIA is necessary only if the development is likely to have significant environmental effects.

Guidance on assessing whether a development would have significant environmental effects is contained in Schedule 3 to the Regulations.

The proposed development does not fall within any of the categories of development outlined within Schedule 1 of the Regulations. The most relevant category of development within Schedule 2 of the Regulations is category 10 which relates to ‘Infrastructure Projects’. Subsection (b) of category 10 relates to ‘Urban development projects, including the construction of shopping centres and car parks, sports stadiums, leisure centres and multiplex cinemas’ and sets the following thresholds and criteria for EIA screening:

- i. The development includes more than 1 hectare of urban development which is not dwellinghouse development; or
- ii. The development includes more than 150 dwellings; or
- iii. The overall area of the development exceeds 5 hectares.

The proposed replacement buildings, comprising a swimming pool hall, a sports hall, and a central hub to serve them would occupy an area of land of less than one hectare. The leisure centre in combination with its car park, associated all-weather sports pitch (being retained in-situ) and play area does exceed one hectare and arguably exceeds the urban development criteria i. as outlined above. It is therefore appropriate to undertake a Screening Opinion to determine if significant effects on the environment are likely and to determine if an EIA is required.

Paragraph 002 of the National Planning Practice Guidance, which relates to ‘the purpose of Environmental Impact Assessment’ advises that “*Environmental Impact Assessment should not be a barrier to growth*

and will only apply to a small proportion of projects considered within the town and country planning regime”.

Assessing if the proposed development would have significant environmental effects

It is also important to note that the National Planning Practice Guide (PPG) confirms that “when screening Schedule 2 projects, the local planning authority must take account of the selection criteria in Schedule 3 of the 2017 Regulations. Not all of the criteria will be relevant in every case. Each case should be considered on its own merits in a balanced way (Paragraph 18, Reference ID: 4-018-20170728, Dated 28/07/2017)”

An assessment is made below of the proposed development in relation to the relevant criteria set out in Schedule 3 of the Regulations.

Characteristics of development

The proposed development, being a replacement leisure centre complex is within the same planning Use Class as the existing complex, being ‘Class E(d) - Indoor sport and recreation’.

The existing and proposed buildings will share very similar characteristics and functions, albeit the new leisure centre will benefit from much-improved building that provide the necessary floorspace to optimise the use of the facilities by the community it serves.

The proposed development is of an appropriate scale in relation to the site and the surrounding area and would not give rise to significant environmental effects.

A summary comparison table of the existing and proposed development is provided below.

Current Facilities

Swimming Pool (5-lane, leisure and training pool)
Baby pool
Lagoon play zone
120 station gym
Studios (Fitness Classes and events)
Sports Hall (10 badminton courts, basketball, 2 volleyball courts)
Café / seating area
Crèche
Squash courts
Bowls Hall
Wet and dry changing areas
External play area

Proposed Facilities

Swimming Pool (8-lane, 25m competition pool w/pt. moveable flr)
Teaching and diving pool with moveable floor
Splash pad with elements of play features
120 station fitness suite
Studios (Fitness Classes and events)
Sports Hall (6 court hall with spectators seating)
Café / seating area
Soft play area
Party rooms
250 spectator seats for the pool hall
Wet and dry changing areas
External play area

This summary overview helps to explain the key similarities and marginal differences between the existing and proposed facilities.

Vehicle and cycle parking

The existing layout provides 369 standard car parking spaces and 25 accessible parking spaces; with a further 88 car parking spaces in an overflow car park to the west of the access road and a further 114 car parking spaces in an overflow car park to the east of the access road. A total of 596 car parking spaces.

The proposed parking arrangement will provide 112 standard car parking spaces, 22 accessible parking spaces, 14 family spaces, 40 electric vehicle charging bays; with a further 88 car parking spaces retained in an overflow car park to the west of the access road and a further 114 car parking spaces retained in an

overflow car park to the east of the access road. A total of 390 car parking spaces. In addition, there will be space for 4 coaches to park / drop-off along the western edge of the car park to assist with use by schools and community groups.

The existing layout provides 12 cycle racks providing 24 cycle parking spaces. The proposed layout will provide 20 cycle racks providing parking for 40 bicycles and these will be located outside the main entrance, monitored from the reception area to aid security.

The proposed development reflects a more sustainable modal shift away from the use of the private petrol/diesel motor vehicle and reflects the greater use of more sustainable travel options including electric vehicles, public transport, cycling and walking. The nature of the proposed development, from a highways and transportation perspective are more favourable and is likely to have fewer impacts than the existing development and not give rise to significant environmental effects.

With regards to construction and demolition, natural resources will be utilised effectively, and any waste associated with the proposed redevelopment will be disposed of responsibly by a suitably qualified contractor. There would also be no risk of major accidents or disasters associated with the development.

Although the development is located in a built up area, and the nearest dwellings are located some 215 metres to the south-east on Randolph Road and 240 metres away to the north on The Warren; the effects of demolition, construction and operation can be managed appropriately through standard planning conditions to ensure that no adverse impact on the local population occurs.

With regards to landscape, and visual impacts the proposed leisure centre buildings would be located with better alignment to Richfield Avenue, and specifically with their massing taken further away from the River Thames, arguably improving the setting of the River.

In light of the above, the characteristics of the development are not considered to be likely to give rise to significant environmental effects.

Location of development

The site is located within the built-up area of Reading and is surrounded by high density commercial development and parkland. The site is already developed and comprises the existing buildings, car parking, play area and all-weather sports pitch.

The leisure centre is dated and the buildings have reached the end of their economic life and have high energy consumption and this proposal seeks to replace the existing buildings with modern buildings that will provide all of the necessary facilities for the leisure centre to operate successfully with a lower energy consumption and enhanced environmental performance. This proposal seeks to re-use a previously developed site, making the most efficient use of the land that is available.

The application site is not located within a 'sensitive area' for the purposes of environmental assessment as set out within the Regulations. More specifically, the site is not within or adjoining a Site of Special Scientific Interest (SSSI), National Park, The Broads, a property on the World Heritage List, a Scheduled Ancient Monument (SAM), Area of Outstanding Natural Beauty (AONB) or a European Site.

The location of development has no impact on the absorption capacity of the natural environment in respect of those areas requiring particular attention, as set out in paragraph 2(a) of Schedule 3 of the Regulations, namely wetlands, riparian areas or river mouths; coastal zones and the marine environment; mountain and forest areas; nature reserves and parks; European sites and other areas classified or protected under national legislation; areas where there has been a failure in environmental quality; or landscapes of historical, cultural or archaeological significance.

In summary, the site lies within an established urban area and comprises a previously developed site. As a result, it is not considered that the site is sensitive under the terms of the Regulations and the location of the development is not likely to give rise to significant environmental effects.

Types and characteristics of the potential impact

The potential significant effects of the development on the environment must be considered in relation not only to the selection criteria considered above, but also having regard to the magnitude and spatial extent of impact; the nature of the impact; the transboundary nature of the impact; the intensity and complexity of the impact; the probability of the impact; the expected onset, duration, frequency and reversibility of the impact; the cumulation of the impact with the impact of other existing and/or approved development; and the possibility of effectively reducing the impact.

At the construction and subsequent demolition phase, any adverse impacts in terms of noise and vibration, pollution, plant and machinery and air quality will be managed by adopting appropriate control measures and working methods. The details of this will be provided and discussed with the Council as part of a formal planning application and we would expect these measures to be secured via a planning condition.

Impacts associated with the operation of the proposed replacement leisure centre in terms of noise and disturbance, scale of buildings and residential amenity, traffic generation and movement, flood risk and drainage and ecological considerations will be addressed and discussed with the Council as part of a formal planning application. It is noted that discussion on these matters has already commenced as part of the pre-application enquiry and that specialist consultants have been appointed to prepare detailed reports to inform the proposed layout and to support a formal planning application. These reports will outline measures to effectively minimise the impact of development.

Overall, it is not considered that the type and characteristics of the potential impact of the proposed development will be significant. The effects of the proposed development are not considered likely to extend beyond the immediate environs or be of a scale or complexity likely to give rise to significant effects on the environment. Furthermore, any likely effects are capable of being appropriately mitigated by employing tried and tested mitigation techniques and practices.

On this basis, the likely environmental effects of the proposed development are not considered to be significant.

Our client is also preparing a separate development proposal for the extension of and refurbishment of the leisure facilities at Palmer Park, Reading, and through our involvement with both proposals, we have considered the potential for cumulative impacts. In our opinion, we consider that the two distinct proposals are sufficiently remote from one another that there will not be any cumulative impacts arising from this proposal.

Conclusion

Having regard to the above detailed consideration of the relevant criteria and thresholds set out and explained within the Regulations and the Planning Policy Guidance, it is evident that the proposal does not constitute Schedule 1 development. Whilst the proposed development exceeds the 1 ha threshold for built development in category 10(a) of Schedule 2 when taken as a whole, the likely impacts of the replacement leisure centre on the same site are not considered to be significant.

In considering these effects, we conclude that the proposal is not EIA development, and we request that the LPA accept this. Accordingly, we request that the Local Planning Authority adopts a Screening Opinion to confirm this, and in accordance with paragraph 6 (6) we look forward to hearing from you within the statutory period.

In the meantime, if you require any further information to enable the Council to determine this request, please do not hesitate to contact me using the details below.

Yours sincerely



Daniel Wiseman
Director

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Encs. Proposed Site Plan, Drawing No. SBA-RM-XX-DR-A-5003, Revision U