

Introduction

This Open Space planning note has been prepared in connection with a proposed development at Palmer Park Leisure Centre. The note has been produced to provide a statement on the loss of open space associated with the proposed development. It identifies the relevant planning context before considering how the loss of open space is acceptable and justified in this instance.

Planning context

The proposed development relates to land that is shown on the Proposals Map for the Reading Borough Local Plan (November 2019) as public open space (Palmer Park) as well as an allocation for the construction of additional leisure facilities/a new swimming pool.

Palmer Park is a large area of public open space, providing a variety of recreational options and accommodating the Palmer Park athletics stadium and velodrome. There is a particular focus on formal sports/playing pitch provision within the Park but there are also substantial areas of informal amenity space, particularly within the southern half of the site around the eastern and southern boundaries of the stadium. The open space policy (policy EN7) sets out that the areas identified on the proposals map (such as Palmer Park) are to be protected from development. It goes on to state that proposals will not be permitted if they:

- result in the loss of any of these areas;
- erode their quality; or
- jeopardise their use or enjoyment by the public.

The ER1j allocation in the local plan that relates to the site and the proposed development is for additional leisure development/ a new swimming pool. The allocation in the local plan has been made in response to an identified leisure need and the requirement for new swimming facilities across the borough is to be met on this site as well as at the Rivermead site. The development proposed is therefore fully justified and of clear public benefit for the local community. The allocation requires the following (where relevant to this matter) as part of the development:

- Demonstrate that car parking to be lost can be replaced on or off-site, or is no longer required;
- Ensure that there is no adverse impacts on the use of the park and its sport and leisure facilities; and
- Retain public rights of way across the site.

In connection with the allocation, the Council has produced a Development Framework (DF) document for the site that has recently been adopted as a supplementary planning document. The DF sets out further details on how the proposed allocation is envisaged to be delivered and makes specific comment on the loss of open space related to the provision of car parking. In this regard it says that the loss can be offset by greenspace gained as part of the framework proposals, such as car free focal space at pool entrance (ca. 900 sqm).

It also includes an indicative framework plan – see extract below – which shows how the small extension to the parking (circled in red) can be accommodated on the site with no negative impact on the amount and quality of overall provision and the ability for it to be used and enjoyed by the public.



In addition to the above local policy context, the National Planning Policy Framework sets out (at paragraph 97) how existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless (where relevant to this application):

"b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location;

"c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use."

Consideration of open space loss/impacts

The loss of open space relates to a small part (992 square metres) of the overall park area, and comprises informal amenity greenspace adjacent to the existing car park provision for the site. The open park area as stated in policy EN7 extends to 16,700 square metres/16.07 hectares or 39.7 acres, with the total park area including the stadium area / allocation being 49 acres. The level of open space lost as part of the proposed development is minor/negligible, constituting just 0.6% of the overall greenspace provision at the park.

The policy related to the protection open space only allows for development where appropriate. When considered against the open space policy, the proposed development will not:

- result in the loss of Palmer Park as an important area of open space for the local community (it will provide a net increase in usable public space within the park through provision of plaza space);
- erode the quality of the open space (it will enhance it); and
- jeopardise its use or enjoyment by the public (it will improve this).

The development relates to a proposed allocation in the plan for the delivery of additional leisure facilities at the site, which in response to an identified leisure need within the area. It is therefore a justified development which will have substantial wider public benefits. With regard to the allocation requirements, the application (where relevant to the open space matter):

- Demonstrates that car parking to be lost can be replaced on site;
- Ensures that there are no adverse impacts on the use of the park and its sport and leisure facilities; and
- Retains public rights of way across the site.

The application is therefore in full accordance with the requirements of the allocation in terms of how it relates to Palmer Park and the existing open space provided.

With regard to the DF, the development proposed is in line with the contents of that document and in fact proposes to use less of the open space than envisaged in the DF document. The proposal reduces some of the existing areas of car parking (by 1,897 square metres) and creates new public space areas (e.g. new pedestrian plaza) extending to 2,448 square metres as an offset (as referred to in the DF document).

In respect of national planning policy in the NPPF, the loss of green open space related to this proposal for alternative sports provision is outweighed by the public benefit of the proposed development. It also provides equivalent and better quality on site through the creation of the public plaza. The development therefore accords with the NPPF on this matter.

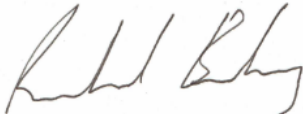
Summary

This note has established that:

- The proposed leisure centre and swimming pool development has a clear justification embedded within the local plan and the DF SPD.
- The scheme has sought to minimise the impacts on and loss of open space and maximise the additional public areas created.
- The minor/negligible loss of informal amenity open space associated with the new area of car parking is outweighed by the public benefits of the proposed development.
- There will be new public space areas created from existing car parking areas to offset the minor loss of informal amenity space – there is a net increase in usable public amenity space/areas.
- The proposal complies with the relevant policies in the local plan, the NPPF, and is in accordance with the DF SPD.

If you have any questions on this note or would like to discuss then please contact me.

Kind regards,



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