

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 extension of the existing leisure centre and refurbishment of the existing grandstand building at Palmer Park.

I write on behalf of our 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 Palmer Park, Wokingham Road, Reading, Berkshire, RG6 1LF

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 extension to the existing leisure centre and refurbishment of the existing grandstand building with associated access, parking, drainage, hard and soft landscaping, refuse and recycling facilities at Palmer 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 Palmer Park Sports Stadium is located on 49 acres of parkland (Palmer Park) to the east of Reading city centre. The facility is located to the south and east side of the park.

The existing facility and its car park are both accessed off of the A329 Wokingham Road which lies adjacent to the south-western boundary of Palmer Park. The site is located 2.0 kilometres east of Reading's central train station and 1.1 kilometres north-west of Earley train station.

The site extends to some 1.28 hectares, with an area on 0.28 hectares being occupied by buildings, an area of 1.00 hectares being occupied by car parking and access, with the rest laid out as hard and soft landscaping including cycle parking.

The site is relatively level with a slight fall from the south and east corner down to the north and west corner of the site, falling from 49.10m above ordnance datum (AOD) down to 47.90m AOD.

The grandstand building, its car park and the land upon which it is situated is all owned by Reading Borough Council. The parkland within which the site is situated is designated as Local Green Space and Public Open Space.

The site is surrounded by a variety of urban forms and uses, including:

- the busy A3290 highway
- high density housing
- community centres, places of worship and a library
- a major logistics/distribution centre to the north
- the Reading University campus to the south

The site is currently configured with the main car park for the leisure centre situated to the south-west of the building. The site can be conveniently accessed via good pedestrian, cycle, vehicular and public transport connections, including bus stops located to serve the site to the north on London Road and to the west on College Road. Vehicular access serving the site is taken off Wokingham Road via Palmers Way.

A variety of footpaths and shared pedestrian/cycle paths (including the R30 Cycle Route Network) provide connections to the surrounding residential neighbourhoods, Reading town centre and the train stations. The site currently benefits from 6 cycle racks providing 12 cycle parking spaces.

The Proposed Development

This request relates to the proposed extension to the leisure centre that exists within the grandstand building at Palmer Park. The grandstand building was opened in 1988 and has served the community well for over 30 years. The building however needs substantial refurbishment to meet the needs of today's users, and roof repairs are essential due to their current poor condition.

The proposed new leisure centre extension will be constructed on the existing car park to the north-west of the existing grandstand building. The majority of the existing facilities would remain operational whilst the extension and refurbishment is carried out.

A fuller description of the development is:

“Demolition of existing entrance lobby, refurbishment of the grandstand building and construction of extension to Palmer Park leisure complex, with associated access, parking, drainage, hard and soft landscaping, refuse and recycling facilities on the car park of the existing leisure centre off Palmers Way, comprising:

- 25m, 6 lane community pool
- fitness suite (110 stations)
- wet and dry changing areas
- double height activity area
- café / seating area
- party / meeting room
- 131 car parking spaces
- 26 new cycle spaces
- parking for 2 coaches”

The refurbished and extended building will continue to provide for the existing leisure pursuits and activities that take place within the park and on the velodrome, track, field and pitches that are being retained; but these facilities will be combined with new amenities to reflect the changing nature of sports and leisure provision including swimming; which is proposed to meet an identified need in the locality.

The continuity of leisure amenity provision at the site is to be retained as far as practical whilst the extension and refurbishment works are carried out. The development will proceed on a phased basis to provide the community with as much uninterrupted access to the sports facilities as possible.

The proposed development has been subject to recent pre-application discussions with Reading Borough Council under application reference: 200154/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 refurbished grandstand building with its proposed extension, comprising a swimming pool and a central hub would occupy an area of land of approximately 0.25 hectares. The extended grandstand building, in combination with its car park, associated access, hard and soft landscaping 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 the development

The proposed development, being an enhanced leisure centre complex is within the same planning Use Class as the existing complex, being 'Class E(d) - Indoor sport and recreation'.

The retained building and the extension will share very similar 'leisure' characteristics and functions, and the new enhanced leisure centre will benefit from a much-improved building that will 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 at Palmer Park Sports Stadium:	Proposed Facilities at Palmer Park Sports Stadium
Athletics Stadium track and field	Athletics Stadium track and field retained
460m Velodrome	460m Velodrome retained
Floodlit Football Pitch	Floodlit Football Pitch retained
Floodlit Artificial Grass Pitches (5 a side)	Floodlit Artificial Grass Pitches (5 a side) retained
Covered Grandstand	Covered Grandstand retained
Gym- Cardiovascular and Weights Gym	100+ stations fitness suite
Fitness studio	Fitness studios (additional provision)
Coffee Outlet	Enhanced café area (kitchen and servery)
Multi- Purpose Room	Party / meeting room
Children's Playground	Children's Playground retained
Car Park & Cycle Parking Facilities	Re-planned Car Park & Cycle Parking Facilities
Changing facilities	Refurbishment of changing facilities
Staff office	Staff office re-provided
Storage space	Enhanced Storage space provision
	Double height activity area with viewing
	6 lane swimming pool
	Village changing facilities
	Plant room
	Seating/ viewing area

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

Vehicle and cycle parking

The existing layout provides 182 standard car parking spaces and 5 accessible parking spaces. A total of 182 car parking spaces.

The proposed parking arrangement will provide 72 standard car parking spaces, 10 accessible/family parking spaces, 10 electric vehicle charging bays; with a further 38 car parking spaces retained in an overflow car park to the south formed using green open cell surfacing. A total of 131 car parking spaces. In addition, there will be space for 2 coaches to park / drop-off along the southern edge of the approach to 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 development 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 just over 100 metres to the south on Palmer Park Avenue; 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 extension will connect to the existing building and is aligned with the track and velodrome to give the appearance of a balanced and planned, almost symmetrical form of development alongside the track. The extended built form, being clustered with the existing built form, and being set amongst the established and heavily tree'd parkland setting arguably has very little landscape impact.

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 residential development, commercial development, community uses and parkland. The site is already developed and comprises the existing grandstand building and the associated car parking, cycle parking and access.

The grandstand building is dated, it is in need of refurbishment including roof works and has a very high energy consumption. This proposal seeks to refurbish and extend the building to 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 refurbish and extend an existing facility on 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 extended 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 replacement of the Rivermead Leisure Centre complex, 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 extended 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. 1789-SBA-XX-XX-A-5003, Revision Q