

DELEGATED PLANNING APPLICATION REPORT

Ward: Abbey

App Ref: 231661/FUL

Address: Kings Meadow Road, Reading

Proposals: Extension of existing dedicated Lido Car Park

Case Officer: Mr Anthony Scholes

Date received (valid from): 17 November 2023 Target Decision date: 12 January 2024,
extension agreed to 6 August 2024

1. SITE DESCRIPTION

Site visit date: 20/12/2023

Site visit photos:



Figure 1 - Site Photo Circa 2014



Figure 2 - Site Photos 20 December 2023

The application site is the dedicated Thames Lido carpark, the Thames Lido is a Grade II listed building located within Kings Meadow. The building has been converted to a commercial enterprise with a heated pool, health spa, restaurant, and event space. The listed building is set well within Kings Meadow, with views of south, and east being highly visible. To the rear is the river Thames and the Caversham Lock. The existing car parking area is laid with gravel and is relatively unmarked. The carpark is set back from the roadway behind the existing a Council owned carpark (King's Meadow Car park). The existing Thames Lido parking area is shown to contain 37 bays.

2. PROPOSAL AND SUPPORTING INFORMATION

The proposed development is for the construction of additional hardstanding associated with an extended carparking area for Thames Lido. The proposal would provide for 21 additional car spaces to the east of the existing tree lined walkway between the Thames Lido and the car parking areas.

Plans considered

Location Plan

Block Plan

Dwg. No - 740.51 - Rev M - Proposed Plan

Dwg. No - 740.51 - Rev K - Existing Plan

Received 20 November 2023

Dwg. No - 740.51 - Rev N - Proposed Plan

Received 22 February 2024

Arboiricultural Impact Assessment, prepared by SDavid Gardner, and date 22 April 2024

Received 12 March 2024

3. RELEVANT PLANNING HISTORY

231659/FUL - Installation of photovoltaic and evacuated tube solar collectors to roof of Thames Lido. APPROVED 28 March 2024

231660/LBC - Installation of photovoltaic and evacuated tube solar collectors to roof of Thames Lido. APPROVED 28 March 2024

141604/FUL - Extension, alteration and restoration of Listed open air swimming pool to provide pool, spa and restaurant with associated car park. Demolition of existing changing rooms and provision of replacement changing facilities. Formation of new vehicular access to Napier Road. Permitted subject to legal agreement 18/06/2015

141605/LBC - Works associated with the extension, alteration and restoration of Listed open air swimming pool to provide pool, spa and restaurant. Permitted 29/12/2014

160409/NMA - Application for a non-material amendment to planning permission (141604) to reposition the sports changing room building to avoid underground high voltage cables. Agreed 8/9/2016

4. CONSULTATIONS

The following addresses were consulted by letter.

Kingfisher Place (All residents), Reading, Berkshire, RG1 8BQ

No letters of representation have been received.

RBC Conservation Consultant

There would be less than substantial harm caused by the proposed car park to the historic green character of the listed curtilage. The revisions to the proposed surface material could reduce this impact; however, planning officers should address a public benefit to finalise the assessment of effects.

RBC Transport (Revised Response 20 March 2024)

This application is for the extension of the existing dedicated Lido Car Park. The existing car park currently has 37 spaces surfaced in compacted gravel, accessed from Napier Road. The applicant has expressed that the success of the Lido has identified a shortfall in car parking for members and guests and further information has been submitted to justify the proposed extension of the car park (received by email on 12th March 2024).

Local parking standards are set out in the RBC, Revised Parking Standards and Design Supplementary Planning Document (SPD). The Lido is within in Zone 2 Primary Core Area, for which the relevant maximum parking provisions are;

- One space per 7.5 sqm for Restaurants*
- One per 15 sqm of pool area*
- One space per 35 sqm of health club.*

Based on the existing floor areas of the restaurant (285 sqm), swimming pool (225sqm) and spa facilities (249 sqm), the site could provide up to 60 parking spaces based on the Council's adopted Parking Standards. The proposals will provide an additional 18 spaces to the east of the existing car park increasing the number of parking spaces from 37 to 55 spaces which is within the prescribed maximum limits.

In addition to this, the applicant has submitted user evidence demonstrating the existing parking provision does not meet the current demands of the business. In view of the above, it is considered that the extension of the dedicated car park would not result in an over-provision of car parking and therefore, complies with policy TR5.

There are no transport objections to the proposal subject to the condition below;

RBC Natural Environment

With reference to the Arboricultural Impact Assessment, Ref: TL/0414/AIA/01, dated 24 April 2024 from David Gardner Arboriculture:

3.3.1 confirms that: 'A total of 9 individual trees and 4 groups of trees were surveyed, of which 3 are of high quality (A category), 7 are of moderate quality (B category) and 3 are of low quality (C category).'

Table 2 in 5.1, along with 5.1.1 & 5.1.2 confirm that 6 stems from a group of trees (G7 - C category) will need to be removed to facilitate development and that new hard surfacing will be within the RPA of 4 individual trees (T3 Norway maple, T4 Norway maple, T5 Alder & T6 Alder - category B). The remainder of section 5 discusses the acceptability of the incursions (percentage not stated) as being acceptable on the basis of the degree of incursion and use of no-dig hard surfacing.

However, the degree of incursion is not stated, as would be expected. I note that the RPAs of the trees T3, T4, T5 & T6 has not been offset to account for the park (field being a more favourable environment than the adjacent car park) despite the AIA discussing this BS recommendation in 4.3. If this is done, the incursion for the new car park will be greater than whatever the author deems it to be at the moment.

It is worth commenting on the trees to be removed. G7 is the group (double avenue) of Dawyck Beech planted either side of the path from the car park to the Lido as part of the landscaping for the original permission. The survey confirms they are in good physiological and structural condition with 40+ years remaining. As a group there are a notable feature and will become a landscape feature of greater significance as they mature (get bigger). I suspect their C category rating is based on their current size and doesn't really reflect their value as a group.

In my opinion, the report downplays their value - 6.2 states: 'The trees to be felled are of low individual or collective value and their loss will not affect the character of the local area over the long-term, provided replacement plantings are included as part of a landscaping scheme'. The felling removes the southern section of this avenue.

A comparison of the Tree Constraints Plan and Tree Protection plan shows the impact of the development and confirms the trees to be removed:

However, I note the TPP only shows 4 trees to be removed (circled in green above), whereas the report indicated 6. I note that Site Plan N indicates the 'relocation' of the above 4 Beech (as opposed to removal); showing 2 of these relocated, albeit the relocated positions appear to be in the location of two existing Beech, when looking at the Tree Constraints plan - clarity is required.

In addition, 'relocation' is not discussed within the AIA, as I would have expect to comment on the practicality and likely success of this. A method statement for the relocation should have been provided, if indeed it is intended.

Site plan N and two proposed relocated Beech is shown below:

I note the areas of proposed cellular confinement system (no-dig surfacing) and would suggest that arbitrarily following the RPA is not the most feasible option as it's best to install the CCS in the sections provided. In addition, given the higher level created by the CCS, marrying this with adjacent hard surfacing will be more difficult if installed only where currently shown. It is more feasible to extend the CCS outside the RPA to an appropriate extent that is implementable.

In relation to mitigation, the Site plan indicates 6 new Alder trees and some Beech hedging. 6 new trees may be neutral or a gain in terms of tree number once clarity on removals is required. I assume Alder (species not confirmed in survey or planting proposal) has been chosen to match existing, albeit the exact existing species would have to be confirmed in order to match. In any case, whilst I appreciate the reason for the choice, it would be preferable to include new species here - more Alders makes the tree line more vulnerable to loss as a whole if pest and diseases affect the species or genus. In line with the aims of our tree strategy, species should be either native or wildlife friendly, and given the adjacent parking, should be chosen to limit nuisance factors.

Final landscaping can be secured by pre-commencement condition, however, if the applicant wishes to avoid this, a landscape plan should be provided prior to a decision clearing stating species, stock sizes, tree pit specifications and a maintenance programme covering 5 years.

Currently, the application is not supported due to the lack of clarity, as discussed above.

RBC Ecology Consultant

The single species beech hedge along the car park to the north and east will be of very little wildlife value (see <https://www.mammalsociety.org.uk/mammal-communications/volume-4/surveying-small-mammals-in-urban-hedges?rq=beech%20hedge> and it would be better if a mixed native hedge were planted instead. I appreciate that they are trying to keep the hedge all the same as the adjoining car park, but it is recommended that the applicant be asked to amend the plans to reflect this comment.

Also, there seem to be inconsistencies between plans regarding the car parking area which is stated as being gravel but is shown on the layout as tarmac.

Equality Act 2010:

In determining this application the Council is required to have regard to its obligations under the Equality Act 2010. However, there is no indication or evidence (including from consultation on the application) that the protected groups identified by the Act have or will have different needs, experiences, issues and priorities in relation to this particular planning application. Therefore in terms of the key equalities protected characteristics it is considered there would be no significant adverse impacts as a result of the development.

5. LEGAL AND PLANNING POLICY CONTEXT

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that proposals be determined in accordance with the development plan unless material considerations indicate otherwise. Material considerations include relevant policies in the National Planning Policy framework (NPPF) - among them the 'presumption in favour of sustainable development'. The following local and national planning policy and guidance is relevant to this application:

Section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires the local planning authority to have special regard to the desirability of preserving a listed building or its setting or any features of special interest which it possesses.

Section 72 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires the local planning authority in the exercise of its functions to pay special attention to the desirability of preserving or enhancing the character or appearance of a conservation area.

National Policy and Guidance

National Planning Policy Framework

National Planning Practice Guidance

Historic England Advice Note 2 - Making changes to Heritage Assets illustrates the application of policies set out in the NPPF in determining applications for Planning Permission and Listed Building Consent.

English Heritage's "Conservation Principles" provides policy and guidance for the "sustainable management of the historic environment".

Historic England's Guidance - Energy Efficiency and Historic Buildings: Solar Electric (Photovoltaics), 2018

Historic England Grade II Listing - 1391153 - KINGS MEADOW SWIMMING POOL, KINGS MEADOW ROAD

Reading Borough Local Plan (2019)

CC1: PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT

CC2: SUSTAINABLE DESIGN AND CONSTRUCTION

CC3: ADAPTATION TO CLIMATE CHANGE

CC4: DECENTRALISED ENERGY

CC7: DESIGN AND THE PUBLIC REALM

EN1: PROTECTION AND ENHANCEMENT OF THE HISTORIC ENVIRONMENT

EN2: AREAS OF ARCHAEOLOGICAL SIGNIFICANCE

EN4: LOCALLY IMPORTANT HERITAGE ASSETS

EN6: NEW DEVELOPMENT IN A HISTORIC CONTEXT

EN11: WATERSPACES

EN12: BIODIVERSITY AND THE GREEN NETWORK

EN13: MAJOR LANDSCAPE FEATURES AND AREAS OF OUTSTANDING NATURAL BEAUTY

EN14: TREES, HEDGES AND WOODLAND

CR2: DESIGN IN CENTRAL READING

CR3: PUBLIC REALM IN CENTRAL READING

CR4: LEISURE, CULTURE AND TOURISM IN CENTRAL READING

TR1: ACHIEVING THE TRANSPORT STRATEGY

TR3: ACCESS, TRAFFIC AND HIGHWAY-RELATED MATTERS

TR5: CAR AND CYCLE PARKING AND ELECTRIC VEHICLE CHARGING

SPG/SPD

Sustainable Design and Construction (2019)

Other Guidance

Historic England Advice Note 2 - Making changes to Heritage Assets illustrates the application of policies set out in the NPPF in determining applications for Planning Permission and Listed Building Consent.

English Heritage's "Conservation Principles" provides policy and guidance for the "sustainable management of the historic environment".

Reading Transport Strategy 2040 (2024)

Equality Act 2010:

In determining this application the Council is required to have regard to its obligations under the Equality Act 2010. However, there is no indication or evidence (including from consultation on the application) that the protected groups identified by the Act have or will have different needs, experiences, issues and priorities in relation to this particular planning application. Therefore, in terms of the key equalities protected characteristics it is considered there would be no significant adverse impacts as a result of the development.

APPRAISAL:

Principle of Development

Policy EN7 'Local Green Space and Public Open Space' states: *"The following Local Green Spaces (LGS) and Public Open Space (POS), as shown on the Proposals Map, will be protected from development. Proposals that would result in the loss of any of these areas of open space, erode their quality through insensitive adjacent development or jeopardise their use or enjoyment by the public, will not be permitted."* Kings Meadow and the Coal Woodland are identified within this policy, with a total area of 16.17ha, and are referenced as EN7Cd on the proposals maps.

A number of sections of the NPPF relate to the proposal, both directly and indirectly. Specifically:

NPPF paragraph 102 states: *“Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities, and can deliver wider benefits for nature and support efforts to address climate change. Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate.”*

NPPF paragraph 103 states: *“Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:*

- a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or*
- 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; or*
- c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use”*

NPPF paragraph 180 states: *“Planning policies and decisions should contribute to and enhance the natural and local environment by:*

- a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);*
- b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services - including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;*
- c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;*
- d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;*
- e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans;*

Committee Report extract 141604/141605 - Refurbishment of Thames Lido 10 December 2014

“6.30 Policy CS28 (Loss of Open Space) requires the amount of public open space to be maintained and Policies CS37 (Major Landscape Features and Strategic Open Space) and SA17 (Major Landscape Features) seek to protect the character of Kings Meadow as a Major Landscape Feature. Policy SA16 (Public and Strategic Open Space) seeks to protect Strategic Open Space, (which includes Kings Meadow), from development which would result in loss of open space or jeopardise its use or enjoyment by the public.

6.31 It is considered that the current proposals would have minimal impact on the open space. The space taken by additional car parking would be compensated for to a large extent by the removal of the existing poor quality hard surfacing to the front of the pool building.

The western and northern extensions would be broadly on the same footprint as existing and would not encroach onto park land in a way which would affect its openness or function. The demolition of the changing rooms and removal of the shipping container would increase the amount of useable open space due to their current inappropriate location which projects out into the main body of the park. Their removal would also significantly improve the appearance of the open space. It is considered that the scale and location of the proposed extension buildings would be appropriate within the context of the open space and would not be harmful to the character or appearance of the Major Landscape Feature. There is therefore considered to be a net benefit in terms of the quality of the open space, in accordance with the policies referred to above.”

The proposal, for the addition of car parking is proposed to serve the private development of Thames Lido. The car park would, as currently be managed privately by the Lido for the use of its users. It appears that the Lido offers some spaces free of charge with bookings, and for a limited time. Though the operation of the car park is not specifically relevant to the proposal, beyond that it would be intended and only used by the users of the Lido.

As outlined above, the application site and its area are within the ‘Kings Meadow and Coal Woodland’ designation of local green space and public open space. The proposal would therefore represent an overall reduction and therefore a loss of public open space. The applicant has provided relatively limited information as to the need and benefit of the proposal, though the key reasons put forward are:

- *The success of Thames Lido has unfortunately exposed a shortfall in car parking for members and guests;*
- *An excel table of 14 complaints about the car parking between 9 September 2023 and 13 February 2024;*

A number of the complaints (4 no.) appear to have found parking nearby in the Train Station Parking and complained about the additional cost of parking. Others appear to have also found parking elsewhere within nearby paid parking areas (or informally parking in supermarket parking areas). Some complaints also suggested that the Lido could include more information on their website about parking around the area, or the limit thereon. It is noted by officers, that the area, being within the defined Reading Central Area, is a highly accessible location with a large number of alternatives to private vehicle trips to service the site, though some walking would be anticipated, this is not unreasonable for a town centre location.

In terms of the relevant planning policies, including the NPPF, there is a general presumption against the loss of such areas unless it can be clearly demonstrated that there is a surplus of open space, there would be a replacement of open space with equivalent or better provision. It is noted that the original committee report associated with the conversion, and additions to the Thames Lido from 10 December 2014 (Council application reference 141604), that the original car parking area as permitted with the application, was accepted on the basis that an area of hardstanding near the entrance to Thames Lido would be removed. It is noted that the hardstanding removed was circa 348m² where the existing parking area is 757m².

Given that the proposed development would seek a wholly private use of public open space, for the provision of hardstanding associated with carparking, there would be no demonstrable public benefit associated with the proposal, nor would there be additional public space elsewhere made available to offset this loss, and as such, it is considered that the loss of public open space would be unacceptable in principle.

Design and Character and Appearance of the Area

Policy EN1 'Protection and enhancement of the historic environment' of the Reading Borough Local Plan (2019) sets out the Council's aspirations for the historic environment. The policy requires that all proposals to protect and, where possible, enhance the significance of heritage assets and their settings, historic character and local distinctiveness of the area in which they are located. It echoes the NPPF by stating, *"Proposals should seek to avoid harm in the first instance. Any harm to or loss of a heritage asset should require clear and convincing justification, usually in the form of public benefits"*.

Applications which affect Listed Buildings are expected not to have an adverse impact on the elements that contribute to their special architectural or historic interest, including their settings.

Policy EN6 'New Development in a Historic Context' also requires new development to contribute to, respect and enhance the architectural and visual qualities of the historic environment characterised by heritage assets. The policy states: *"When determining planning applications for new development, the following factors will be taken into consideration:*

- a. The positive contribution of the development to the existing historic townscape (scale, height, mass, proportion, plot size, street form, materials, significant vistas and views, and open space);*
- b. Sensitivity to historic context;*
- c. Reflection of borough-wide major heritage themes that contribute to local distinctiveness (e.g. patterned brickwork or former worker terraced housing);*
- d. Whether development promotes and/or improves access to previously undiscovered or neglected historic significance."*

Policy CC7 states that: *"All development must be of high design quality that maintains and enhances the character and appearance of the area of Reading in which it is located. The various components of development form ..."*.

Policy EN13 'Major Landscape Features and Area of Outstanding Natural Beauty' states that: *"Planning permission will not be granted for any development that would detract from the character or appearance of a Major Landscape Feature. The following areas, as shown on the Proposals Map, are defined as Major Landscape Features: The Thames Valley"*. The proposals maps identify the entire site (red line plan), and the wider Kings Meadow as part of the Major Landscape Feature.

National Planning Policy Framework

The NPPF outlines government policy, including its policy in respect of the historic environment. Chapter 16 of the NPPF 'Conserving and enhancing the historic environment' sets out the Government's high-level policies concerning heritage and sustainable development.

Paragraph 203 requires local planning authorities should take account of the desirability of sustaining and enhancing the significance of heritage assets and of new development making a positive contribution to local character and distinctiveness.

Paragraph 205 of the NPPF requires that *'when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation....'* And paragraph 206 says, *'any harm to, or loss of, the significance of a designated heritage asset (from its alteration...) should require clear and convincing justification'*. Paragraph 208 says that *'where a development proposal will lead to*

less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal...'

Paragraph 206 of the NPPF states: *"Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use."*

The application site is within the setting of the Grade II listed building, the Thames Lido (Listing 1391153 - KINGS MEADOW SWIMMING POOL, KINGS MEADOW ROAD). Given the setting of a heritage asset is the surroundings in which the asset is experienced, it should be noted that Kings Meadow Recreation Ground constitutes the setting of Kings Meadow Swimming Pool. As such, the significance of the listed pool also lies within its relationship with this historic green area, where the former men's bathing place and original diagonal path/way to the listed pool and lodge constitute the original/historic layout of the application site.

Based on the historic maps and planning history of the site, it appears that the existing NCP car park dating the 1970s is the first erosion of Kings Meadow. Later, to preserve and enhance the viable use of the swimming pool, permission was granted in 2015 for "Extension, alteration and restoration of Listed open air swimming pool to provide pool, spa and restaurant with associated car park. Demolition of existing changing rooms and provision of replacement changing facilities. Formation of new vehicular access to Napier Road."



The Council's Historic Map of the 1970s (left) and the approved new buildings plan of permission ref. 141604 (right) in 2015

It is noted that the plans submitted indicate the proposal as 'area of new tarmac', though it is considered that the materials could be controlled by condition, and the most likely situation would be that the area would be laid with similar loosely compacted light coloured gravel similar to the existing Lido car park. This could be controlled by condition, and therefore the specific materiality is not objectionable.

The area is characterised by the large expanse of open space with views beyond the existing 70's car park of a large open field, with various playing fields. The existing car park stops, at the point of the tree lined path from the parking areas to the Lido Building. As above, this was considered under the previous application (c.2014) and was accepted in principle as a overall benefit to the Thames Lido, through the reduction in hard surfacing directly adjacent the Lido.

The current proposal would see an expansion of carparking. Though the area is somewhat characterised by poor quality car parking area, which represents a poor and detracting visual appearance of both Thames Lido, and the wider Kings Meadow. The areas beyond existing

parking areas provide for the wider enjoyment of people within the Borough. The proposed development would represent a further erosion of the open green nature of the area, and convert to a parking and storage area for vehicles, overall this additional hardstanding, and carparking would represent a harmful impact upon the remaining green open nature of the area and the curtilage of the listed building, and Major Landscape Feature.

Given the considerations above, it is not considered that the conversion of a public green open space to private car parking associated with a private business would represent any public benefit to outweigh the identified harm.

Natural Environment Considerations

The Reading Borough Local Plan 2019, policy EN14 states: *“Individual trees, groups of trees, hedges and woodlands will be protected from damage or removal where they are of importance, and Reading’s vegetation cover will be extended. The quality of waterside vegetation will be maintained or enhanced.”*

In addition, the NPPF, paragraph 136 states: *“Trees make an important contribution to the character and quality of urban environments, and can also help mitigate and adapt to climate change. Planning policies and decisions should ensure that new streets are tree-lined⁵³, that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly-planted trees, and that existing trees are retained wherever possible. Applicants and local planning authorities should work with highways officers and tree officers to ensure that the right trees are planted in the right places, and solutions are found that are compatible with highways standards and the needs of different users”*

The tree plantings associated with the original landscaping plan, as approved in 2014, included a number of trees now sought to be removed. This includes four, now established Beech trees. The removal of any trees, would at least require replacement planting with additional planting, i.e. should 4 be removed, 6 should be planted, and should 6 be removed, 8 should be planted. However, in this instance, the location, and future shade provided through the existing location of the trees would be near continuous. The break, by removal to facilitate two-way vehicle traffic would be inappropriate in this instance. The value of the trees in their current location contribute positively to the character and appearance of the area, and would also assist in shading a pathway which may need additional shade as a result of longer hotter summers due to climate change.

As above, Council’s tree officers have objected due to insufficient information being provided. This includes practicality of transplanting Beech trees proposed to be moved.

RBC ecologists have reviewed the BNG calculation, and accepted that the proposal would result in a biodiversity net gain in line with newly adopted requirements. It was noted that Mixed Native hedge is preferred compared to the proposed beech hedge which would provide limited wildlife value. Should an approval have been recommended, the species of hedging could have been controlled and approved through conditions.

Transport matters

The Reading Borough Local Plan 2019, policy TR1 states: *“Proposed development should contribute appropriately to meeting the objectives of the most up-to-date Local Transport Plan or any successor document, including sub-strategies, specific projects identified and the local action plans. ... All development proposals should make appropriate provision for works and contributions to ensure an adequate level of accessibility and safety by all modes of transport from all parts of a development, particularly by public transport, walking and cycling, in accordance with any agreed transport assessment submitted as part of the application.”*

The Strategic Environment, Planning and Transport Committee endorsed the Final revisions of the ‘Reading Transport Strategy 2040’ (RTS 2040) (2024), this is set to be formally adopted at the full Council meeting on 25 June 2024. For the purposes of this application, the Reading Transport Strategy 2040 is considered the most up-to-date Local Transport Plan given it has gone through substantial public consultation, and has been endorsed by the relevant Council committee.

The vision from the RTS 2040 states: *“Our vision is to deliver a sustainable transport system in Reading that creates an attractive, green and vibrant town with neighbourhoods that promote healthy choices and wellbeing. Future mobility options will enable everyone in Reading to thrive, enjoy an exceptional quality of life and adapt to meet future challenges and opportunities.”*

The RTS 2040 sets out the five objectives which underpin the vision. Some of these include:

“Creating a Clean and Green Reading: Provide transport options to deliver modal shift, enhance quality of life, reduce emissions and improve air quality to create a carbon neutral town.

...

Connecting People and Places

Promote the use of sustainable modes of transport by providing attractive alternatives to the private car, helping to provide a transport network that is fast, affordable, connected and resilient.

Overall, the substantial document prepared, named the RTS 2040, includes a broad objective of promoting modal shift away from private car travel, and providing a high quality network of alternatives for those within Reading, and those visiting Reading. The RTS 2040 also acknowledges that partnerships are required, including between local businesses to achieve these goals.

Policy TR5 of the Reading Borough Local Plan 2019 states: *“Development should provide car parking and cycle parking that is appropriate to the accessibility of locations within the Borough to sustainable transport facilities, particularly public transport.*

Development should make the following provision for electric vehicle charging points:

- *All new houses with dedicated off-street parking should provide charging points;*
- *Within communal car parks for residential or non-residential developments of at least 10 spaces, 10% of spaces should provide an active charging point.”*

The Council has also adopted a Parking Standards and Design Supplementary Planning Document. When considering the numbers below, it should be noted in the text of the SPD states: *“The car parking standards set, except for those relating to residential (C3), are to*

be imposed as maximums, unless a developer can prove that their development requires parking at a higher level for exceptional circumstances.”

Paragraph 108 of the NPPF states: *“Transport issues should be considered from the earliest stages of plan-making and development proposals, so that: ... c) opportunities to promote walking, cycling and public transport use are identified and pursued; ... e) patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places”*

Paragraph 112 of the NPPF states: *“Maximum parking standards for residential and non-residential development should only be set where there is a clear and compelling justification that they are necessary for managing the local road network, or for optimising the density of development in city and town centres and other locations that are well served by public transport (in accordance with chapter 11 of this Framework). In town centres, local authorities should seek to improve the quality of parking so that it is convenient, safe and secure, alongside measures to promote accessibility for pedestrians and cyclists.”*

The applicant has expressed that the success of the Lido has identified a shortfall in car parking for members and guests and further information has been submitted to justify the proposed extension of the car park (received by email on 12th March 2024).

Local parking standards are set out in the RBC, Revised Parking Standards and Design Supplementary Planning Document (SPD). The Lido is within in Zone 2 Primary Core Area, for which the relevant maximum parking provisions are;

- One space per 7.5 sqm for Restaurants
- One per 15 sqm of pool area
- One space per 35 sqm of health club.

The applicant has put forward the following floor areas of: the restaurant (285 sqm), swimming pool (225sqm) and spa facilities (249 sqm). These measurements have not been provided to demonstrate their accuracy. Based on previously submitted plans, they do appear to be fairly accurate. Based on the above, the maximum level of carparking for the site would be 60 parking spaces in accordance with the adopted SPD. This is agreed by RBC Transport officers who confirmed that their opinion was that the proposal would comply with policy TR5. Planning officers disagree on the compliance in relation to this matter. The transport officers agree that the parking provision comply with the SPD and therefore comply with policy TR5, though in assessing the compliance, or lack thereof planning officers are minded to consider more than the maximum allowable and therefore have recommended refusal against the response to transport officers as outlined in this section. Planning officers have also provided comments on the need for additional parking relative to the complaints to inform a differing opinion to transport officers.

In accordance with the NPPF sections above, and policy TR1, the maximum parking standards have been set within the adopted SPD as Reading is well serviced by high frequency public transport both within and from outside of the Borough. In addition, the RTS 2040 outlines the vision and goals of reducing car dependency, tackling traffic and congestion. By virtue of this, the proposed development, though it is stated that parking demand is high from its users, is considered to be overparked, and in conflict with Reading Borough Local Plan 2019 policy TR1 and TR3. The overparking of the development, would encourage use of private vehicles contrary to the goals of the RTS 2040, and therefore would be harmful to the environment, air quality and the overall goals of sustainable development. The fact that a number of complainants are predominantly complaining of cost of parking, where they are easily able to find alternatives to parking at the Thames Lido does not outweigh the harm compared to the goals and aims of policies and documents outlined above.

The development would be expected, in accordance with policy TR5 to provide 10% of the proposed parking spaces as EV charging spaces. This could be secured by condition should approval be recommended.

Flood Risk

The application site is within Flood Zone 3. The site would replace a permeable grassed area with a semi-impermeable compacted gravel surface. In accordance with Policy EN18 Flooding and Sustainable Drainage Systems, and the NPPF (para. 173 and 174) which states that:

“173. When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood-risk assessment⁵⁹. Development should only be allowed in areas at risk of flooding where, in the light of this assessment (and the sequential and exception tests, as applicable) it can be demonstrated that:

- a) within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location;*
- b) the development is appropriately flood resistant and resilient such that, in the event of a flood, it could be quickly brought back into use without significant refurbishment;*
- c) it incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate;*
- d) any residual risk can be safely managed; and*
- e) safe access and escape routes are included where appropriate, as part of an agreed emergency plan*

pplications for some minor development and changes of use⁶⁰ should not be subject to the sequential or exception tests but should still meet the requirements for site-specific flood risk assessments set out in footnote ⁵⁹.”

Footnote 59: A site-specific flood risk assessment should be provided for all development in Flood Zones 2 and 3. In Flood Zone 1, an assessment should accompany all proposals involving: sites of 1 hectare or more; land which has been identified by the Environment Agency as having critical drainage problems; land identified in a strategic flood risk assessment as being at increased flood risk in future; or land that may be subject to other sources of flooding, where its development would introduce a more vulnerable use.

Footnote 60: This includes householder development, small non-residential extensions (with a footprint of less than 250m²) and changes of use; except for changes of use to a caravan, camping or chalet site, or to a mobile home or park home site, where the sequential and exception tests should be applied as appropriate.

The use of the existing building for leisure and tourism uses has been sequentially tested for flood risk under Policy CR14m. In this instance, it is considered that the relatively modest extensions of the carpark which has been stated as required to secure the future of this particular building are site specific and no other sites could perform the same function. The search area for the Sequential Test is therefore limited to the land associated with the Kings Meadow Baths. The new car park can only reasonably be provided attached to the existing car park. It is anticipated that the Sequential Test is passed as there are no reasonably available alternative sites at lower risk of flooding within the defined search area.

Having passed the Sequential Test, the acceptability of the proposed development is dependent on the flood risk implications of the proposals, to be assessed under the Flood Risk Assessment. The applicant has not completed a flood risk assessment relative to the proposal

Conclusion

The proposed development seeks a change of use of land from public green open space, to a private car park associated with the Thames Lido. The applicant has purported that the need for the space would fulfil the interest of the optimal use of the Listed Building in line with NPPF requirements. As above, the principal of the loss of the public green space associated with the wider Kings Meadow is considered unacceptable in principle, the loss of such space is not offset by demonstration of merits of the proposal, or a suitable alternative provision. The further erosion of the public open space within the context as forming part of the setting of the listed building is also considered to cause 'less than substantial harm' to the listed building. Similarly, though the applicant seeks to justify under the SPD, these maximum parking standards are not considered to be the only amount that could accommodate operation of the business, and it appears justifiable that the SPD sets a maximum of parking given the highly accessible location, via a number of different means. This also includes alternative public carparking within the vicinity. As such, the harm to the listed building is not considered to be offset by public benefit or benefit to the operation of the listed building. The harm is also added to through the loss of part of the purposely planted pathway, and replacement or relocation that detracts from the open and tree lined character and appearance of the area.

RECOMMENDATION

Refuse