

COMMITTEE REPORT

BY THE EXECUTIVE DIRECTOR OF ECONOMIC GROWTH & NEIGHBOURHOOD SERVICES
READING BOROUGH COUNCIL
PLANNING APPLICATIONS COMMITTEE: 31st March 2021

Ward: Abbey

App No.: 201734

Address: Rivermead Leisure Complex, Richfield Avenue

Proposal: New replacement leisure centre including a 25m 8 lane competition pool and diving, with associated parking and landscaping, followed by demolition of existing centre.

Applicant: Greenwich Leisure Limited (GLL)

Deadline: 12th March 2021

Extended Deadline: 9th April 2021

Planning Guarantee 26 week target: 11th June 2021

RECOMMENDATION:

GRANT Planning Permission subject to conditions and informatives.

CONDITIONS TO INCLUDE:

- 1) TL1 - 3 yrs
- 2) AP1 - Approved Plans
- 3) M2 - Materials to be submitted and approved
- 4) C1 - Hours of Construction
- 5) C2 - Construction Method Statement to be submitted and approved including Phasing Plan.
- 6) C3 - CMS as Specified - The measures within the approved Air Quality Assessment (Syntegra, November 2020) for the control of dust during construction shall be adhered to throughout the whole of the construction period unless otherwise agreed in writing by the Local Planning Authority.
- 7) C4 - No Bonfires
- 8) C04 - Submission and approval of a contamination assessment - for areas under the current leisure centre
- 9) C06 - Assessment of previously unidentified contamination
- 10) Land Gas - Remediation scheme to be submitted, approved and implemented prior to occupation.
- 11) Land Gas - Implementation of the remediation scheme in accordance with the approved timetable of works and a validation report to be submitted and approved prior to occupation.
- 12) No drainage systems for the infiltration of surface water to the ground (EA wording)
- 13) Piling using penetrative methods shall not be carried out other than with the written consent of the local planning authority. The development shall be carried out in accordance with the approved details.
- 14) N8 - Noise levels of plant/ equipment restricted
- 15) N21 - Hours of operation (external lighting)
- 16) Details of lighting

- 17) In accordance with the FRA and that finished floor levels shall be set no lower than 39.22 metres above Ordnance Datum (AOD)
- 18) SU5 - BREEAM Excellent - Design stage
- 19) SU6 - BREEAM Excellent - Built stage
- 20) SU7 - SUDS plan to be approved
- 21) SU8 - SUDS to be implemented
- 22) S1 - Detail of PV to be approved
- 23) DC1 - Vehicle Parking as specified
- 24) An annotated plan showing the proposed layout and access arrangements of No building hereby permitted shall be occupied until full details of the direction signage and markings within the car park area has been submitted to an approved in writing by the Local Planning Authority, and thereafter maintained in good condition.
- 25) DC3 - Vehicle Access as specified prior to occupation
- 26) DC6 - Cycle Parking to be approved
- 27) DC7 - Refuse and Recycling to be approved (to be vermin proof)
- 28) DD6 - Visibility splays to be provided as specified
- 29) DE6- Provision of Electric Vehicle Charging Points
- 30) L2 - Hard and soft landscaping scheme to be submitted and approved
- 31) L3 - Boundary Treatment
- 32) L4- Landscape Management and Maintenance Plan to be submitted and approved
- 33) Bat survey before any demolition
- 34) Measures to provide bat and bird boxes to be implemented prior to occupation
- 35) Vegetation clearance to avoid bird nesting season (March-August)
- 36) Hours of use - 6am to 11pm Mon to Sat, and 6am to 9.30pm on Sundays
- 37) The use of the existing leisure centre to cease prior to the occupation of the replacement leisure centre
- 38) Submission and approval of an Employment, Skills and Training Plan - construction skills

INFORMATIVES TO INCLUDE:

- 1) IF5 - Terms and Conditions
- 2) IF6 - Building Regulations
- 3) IF2 - Pre-Commencement Conditions
- 4) I11 - CIL Not Chargeable
- 5) IF4 - S106
- 6) IF3 - Highways
- 7) I29 - Access Construction
- 8) IF7 - Complaints about Construction
- 9) IF8 - Encroachment
- 10) Thames Water informatives.
- 11) IF1 - Positive & Proactive.

1. INTRODUCTION & BACKGROUND

- 1.1 The application site is approximately 5.25 hectares and comprises the existing Rivermead Leisure Centre, which opened in 1988. A gym

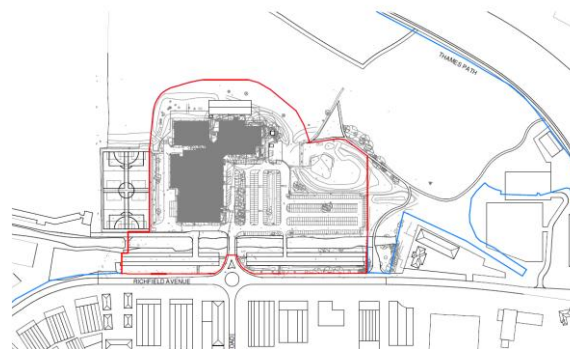
extension was added to the north-west of the centre in 2007/08 and a new demountable training pool and hall were constructed in 2017/18. There is also an artificial floodlit grass pitch (to the west, beyond the red line area), car parking, a play area, and associated landscaping.

- 1.2 The application site is relatively level and is located within the Rivermead Park, on the south side of the River Thames, to the north of Richfield Avenue and west of Caversham Bridge. To the south of the site is a large commercial/ industrial area. To the west is the site of a future 8-form entry secondary school and detailed pre-application discussions have taken place for the masterplanning of this part of the Rivermead site between the Department for Education (DfE), Reading Borough Council and GLL (the applicant for the proposal under consideration).
- 1.3 Further west is the site of the annual Reading Festival. The nearest residential properties are at Caversham Place approximately 280m away and there are also properties on the Warren, approximately 295m away.

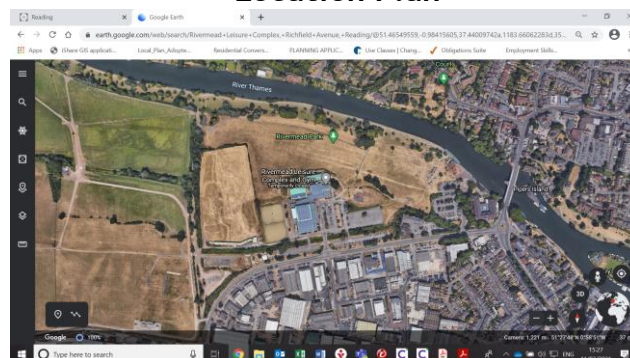


- 1.4 The site is within the Air Quality Management Area (Policy EN15); allocated for leisure under WR3d; in Flood Zone 2 (between 1 in 100 and 1 in 1,000 annual probability of river flooding - Policy EN18); within a Major Landscape Feature (Policy EN13); and partly within, but mostly adjacent to a Local Green Space and Public Open Space (Policy EN7 Wp).
- 1.5 The proposed scheme arose from a strategic review of indoor sports facilities in the Borough, undertaken in 2015. This assessed the age, quality, size, accessibility, community use, opening hours and type of management of each existing facility, focusing on the current and future supply and demand for key sporting facilities and, in particular, considered the amount and configuration of swimming pool water (including diving) and sports hall space. Extensive consultation was undertaken with stakeholders and this resulted in a range of recommendations for sport and recreation facilities including those for Rivermead.
- 1.6 The proposed redevelopment of the Rivermead site forms one part of the borough wide 25-year leisure contract awarded by RBC to GLL following RBC Policy Committee in January 2020.

- 1.7 The submitted Design and Access Statement states that the centre has exceeded its anticipated lifespan and reached the end of its economic life, and therefore, a proposed replacement, rather than refurbished solution, was pursued.
- 1.8 In January 2019 the Council published a detailed specification seeking and inviting interested leisure operators to submit detailed solutions and the specification included the following:
- A new-build solution at Rivermead, incorporating a new 8 lane competition standard pool with provision for diving, learning, introduction to water space and a 5 court sports hall which could accommodate league 1 basketball.
- 1.9 The Council subsequently procured Greenwich Leisure Limited (GLL) as the operator of their leisure facilities, with the joint aims of managing the existing facilities and to develop new facilities. These new facilities were identified through an assessment of local needs and delivery options, which confirmed that whilst there is sufficient pool space in the Borough the quality of provision needs upgrading. The options appraisal included in the assessment recommended the replacement of the most outdated facilities with more modern cost-effective leisure facilities. This included the recommendation for a new competition standard pool with diving provision at Rivermead.
- 1.10 The application is referred to committee as it is a ‘major’ development. It is not a REG3 application, because GLL are the applicant and would design, build and run the facility on behalf of the Council.



Location Plan



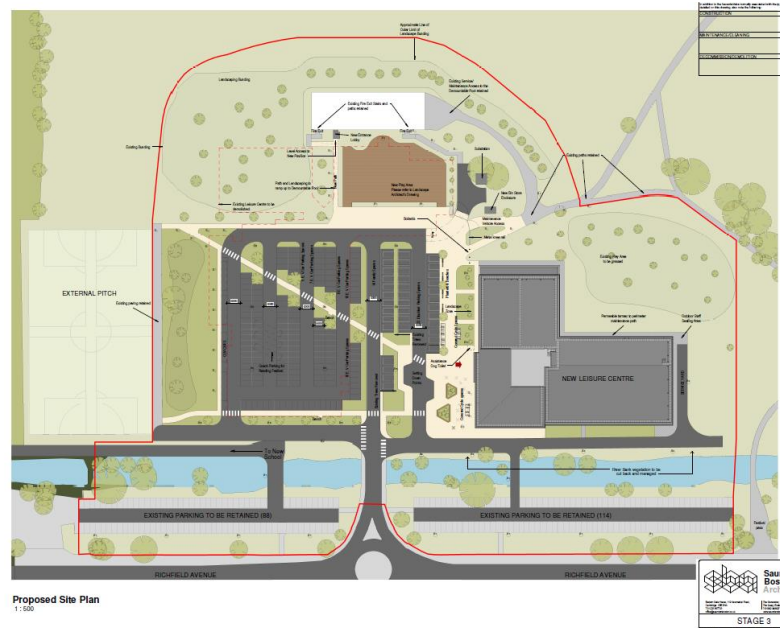
Aerial Photo



Google Earth Image (looking east)

2. PROPOSAL

- 2.1 The proposal is for a new two storey l-shaped building with three main sections: 'Hub' (central), sports hall (wing north-south), and pool (wing east-west), (see proposed site layout below) to accommodate the following functions:
- 25m, 8 lane competition 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.
 - Six court sports hall with spectator seating (dry diving)
 - Fitness suite (120 stations)
 - Studio spaces (for a range of exercise classes - spin, etc)
 - Spin studio
 - Café / seating area
 - Soft play area/ double activity zone
 - Party rooms
 - Wet and dry changing areas
 - New entrance pavilion to retained training pool (existing demountable)
 - 188 new car parking spaces
 - 40 Electric Vehicle Charging Points
 - 40 new cycle spaces
 - Associated soft and hard landscaping
 - Existing pedestrian and vehicular access and overflow car park areas along Richfield Avenue will be retained.
- 2.2 The existing leisure centre is proposed to remain fully operational whilst the new centre is constructed on a phased basis. Once completed, the existing leisure centre would be demolished although the existing demountable pool retained with a proposed new small entrance pavilion.



- 2.3 Submitted plans and documentation received 4th December 2020, unless otherwise stated (including amended details) are as follows:
- Location Plan - Drawing no: 1790-SBA-RM-XX-A-5001 Rev A
 - Existing Site Plan - Drawing no: 1790-SBA-RM-XX-DR-A-5002 Rev C
 - Proposed Ground Floor Plan 1790-SBA-RM-00-DR-A-0013 Rev P1 rec 15/3/21
 - Proposed First Floor plan 1790-SBA-RM-00-DR-A-0014 Rev P1 rec 15/3/21
 - Proposed Roof Plan - Drawing no: 1790-SBA-RM-R1-A-0012 Rev E
 - Proposed Site Plan - Drawing no: 1790-SBA-RM-XX-DR-A-5003 Rev P4, received 15th March 2021
 - Proposed North and East Elevations - Drawing no: 1790-SBA-RM-ZZ-A-2002 Rev H
 - Proposed South and West Elevations - Drawing no: 1790-SBA-RM-ZZ-A-2001 Rev P2, received 17th March 2021
 - Demountable Pool Pavilion - Drawing no: 1790-SBA-XX-00-DR-A-6022, received 15th March 2021
 - Proposed Pavilion Elevations - Drawing no: 1790-SBA-XX-ZZ-DR-A-6200, received 15th March 2021
 - Proposed Sections - Drawing no: 1790-SBA-RM-ZZ-A-1001 Rev F
 - Outline Landscaping Plan - Drawing no: EML PEL 114201 Rev G, received 17th December 2020
 - Site Plan - New connections Mechanical and Electrical Site Services Layout - Drawing no: C7403-TLP-RM-00-DR-ME-902 Rev A
 - Air Quality Statement, Document ref: 20-6868, dated 27th November 2020, prepared by Syntegra Consulting
 - Built Heritage, Townscape and Visual Impact Appraisal, Document ref: 2016-RE01 V3, dated December 2020, prepared by Neaves Urbansim
 - Contamination Assessment, prepared by Furness Partnership

- Integrated Planning, Design and Access Statement, Document ref: SBA-RM-XX-RP-A-001, dated 9th November 2020, prepared by Saunders Boston Architects
- Elevation Design Drivers [DAS Addendum,] Document ref: SBA-RM-XX-RP-A-002 dated 12th March 2021, prepared by Saunders Boston Architects, received 12th March 2021
- Energy Strategy Rev D, dated 25th November 2020, prepared by Thornley & Lumb Partnership Ltd
- External Lighting Impact Statement, Second Issues, dated 25th November 2020, prepared by Thornley & Lumb Partnership
- Site Plan External Lighting Layout - Drawing no: C7403-TLP-RM-00-DR-E-801 Rev A
- Flood Risk Assessment, Rev 03, dated 1st February 2021, prepared by Furness Partnership, received 2nd February 2021
- Flood Risk Assessment Addendum Rev 01, dated February 2021, prepared by Furness Partnership, received 19th February 2021
- Letter from Furness Partnership to the Environment Agency regarding the revised Flood Risk Assessment, dated 8th January 2021, received 2nd February 2021
- Main Investigation Report, Document ref: 17755/MIR_R27 Rev 1.01, dated August 2019, prepared by Soils Ltd
- Noise Impact Assessment, Document ref: 20-6868, dated 20th November 2020, prepared by Syntegra Consulting
- Outline Landscaping Proposal Revision E
- Proposed Drainage Layout - Drawing No: FUR ZZ ZZ DR D 0911
- Preliminary Bat Roost Assessment, Document ref: R2670/a, dated November 2020, prepared by John Wenn Ecological Consultancy
- Preliminary Ecological Appraisal, Document ref: R2302/b, dated August 2019, prepared by John Wenn Ecological Consultancy
- Request for Screening Opinion, Document ref: GLL1001, dated 1st December 2020, prepared by Gillings Planning
- Sustainability Statement for Rivermead Leisure Centre, dated 27th November 2020, prepared by Ecoteric
- Transport Assessment, Document ref: 15058-HYD-XX-XX-RP-TP-5001, Issue P04, dated 30th November 2020, prepared by Hydrock
- Travel Plan, Document ref: 15058-HYD-XX-XX-RP-TP-6001, Issue P02, dated 27th November 2020, prepared by Hydrock
- Tree Survey, Arboricultural Impact Assessment, Preliminary Arboricultural Method Statement and Tree Protection Plan, dated 12th March 2021 Rev B, prepared by Hayden's Arboricultural Consultants, received 22nd March 2021
(*Planning Officer note: Review of this by Natural Environment officer to be reported in an update*)
- TS & AIA [Tree Survey and Arboricultural Impact Assessment] - Drawing no: 8458-D-AIA Rev B, received 22nd March 2021
(*Planning Officer note: Review of this by Natural Environment officer to be reported in an update*)
- Utility Assessment, Issue 2, dated 25th November 2020, prepared by Thornley & Lumb Partnership Ltd

- Ventilation and Extraction Statement, dated 19th November 2020, prepared By Thornley & Lumb Partnership Ltd
- CIL Form 1: Additional Information
- Consultation Response Statement, dated 24th February 2021, prepared by Saunders Boston Architects, received 12th March 2021

2.4 Community Infrastructure Levy (CIL): the proposal is CIL liable, but leisure is not a chargeable use, as set out in the Council's CIL Charging Schedule.

3 PLANNING HISTORY

Relevant planning history is as follows:

161069/PREAPP - A single storey extension (900m²) to the existing leisure centre comprising of a demountable swimming pool encompassing a five lane 25msq 10m teaching pool, 10msq 13m leaner pool, pool plant filtration and ancillary changing space - Observations sent 15/12/2016

162323/FUL - Northern extension of the existing Rivermead Leisure Centre to accommodate a new, permanent building for leisure purposes (D2 use), with an associated changing village and associated plant, to house a temporary 'demountable' swimming pool - Approved 21/2/2017

170486/APPCON - Application for approval of details reserved by condition. (162323) - Discharged 1/7/2017

170808/APPCON - Application for approval of details reserved by condition. (162323) - Discharged 23/8/2017

170809/APPCON - Application for approval of details reserved by condition 14 of 162323 - Habitat protection/Mitigation - Discharged 15/6/2017

171331/NMA - Non-Material Amendment to planning permission 162323 (northern extension to Rivermead Leisure Centre) to: substitute glazed walling system and polycarbonate corridor glazing with aluminium frame windows; alterations to rainwater goods specification; adjustments to louvre and high level window positions and base/cill lines and level of corridor glazing - Agreed 2/10/2017

200153/PREAPP - Pre-application advice for new leisure centre including swimming pool and ancillary facilities - Observations sent 22/4/2020

4 CONSULTATIONS

Statutory

Environment Agency (EA)

- 4.1 The EA initially objected: The submitted FRA does not comply with the requirements for site-specific flood risk assessments, as set out in paragraphs 30 to 32 of the Flood Risk and Coastal Change section of the planning practice guidance. This application is also contrary to Policy EN18 of the Reading Local Plan. The FRA does not therefore adequately assess the flood risks posed by the development. In particular, the FRA fails to:
- Take the impacts of climate change into account - different climate change allowances have been used to assess future flood risk than those advised in 'Flood risk assessments: climate change allowances', without adequate justification.
 - Proposes inadequate floodplain compensation - the applicant has referenced a model that is no longer the best available information and there is limited information provided to demonstrate the impact of the proposed development on the floodplain.
- 4.2 The applicant can overcome our objection by supplying further information on the following:
- footprints of the existing and proposed development
 - clarifying if the proposed development, including any landscaping, will take up more flood plain storage and therefore compensation is required
 - identifying where the proposed development will sit within 1 in 100 plus appropriate climate change extent. We recommend that the flood extents are overlain onto the site plan
 - further information on the earth bunds as shown on the proposed site plan - are these existing earth bunds or proposed? Are these within the 1 in 100 plus 35% extent and will compensation be required?
- 4.3 Floodplain storage - It will need to be shown that any increase in built footprint within the 1% annual probability (1 in 100) flood extent with an appropriate allowance for climate change can be directly compensated for. This is necessary to prevent the new development reducing flood plain storage and displacing flood waters, thereby increasing flood risk elsewhere.
- 4.4 Level-for-level compensation is the matching of volumes lost to the flood plain, through increases in built footprint, with new flood plain volume by reducing ground levels. Please note for this to be achievable it requires land on the edge of the floodplain and above the 1% annual probability (1 in 100) flood level with an appropriate allowance for climate change to be available. A comparison of ground levels (topographical survey) with modelled flood plain levels will

show land above the 1% annual probability (1 in 100) flood level with an appropriate allowance for climate change to be used as compensation. If it is not possible to provide level for level flood plain compensation then other forms of mitigation may be considered if agreed with the Local Planning Authority (LPA). The FRA must demonstrate that level for level compensation has been considered, explain why it was not possible to provide it and detail how any associated risks from the chosen form of mitigation can be minimised.

- 4.5 If voids are proposed as an alternative form of mitigation these will need to be floodable, with the underside of the void above the 1% annual probability (1 in 100) flood level with an appropriate allowance for climate change. The LPA must also be satisfied that they can enforce a condition to maintain the voids as designed and that an adequate maintenance plan is in place to ensure the voids remain open for the life time of the development.
- 4.6 If the LPA are not satisfied that alternative mitigation measures are appropriate then the applicant should revise their development proposals to ensure that there will be no increase in built footprint on this site.
- 4.7 If this cannot be achieved, we are likely to maintain our objection.
- 4.8 ***Planning Officer note:*** Following the submission of an amended FRA and FRA addendum (*latter quantifying the amount of existing bunding surrounding the demountable pool which would be retained*) the EA removed their objection subject to conditions: Development to be carried out in accordance with the submitted FRA; land gas remediation strategy and verification report; No drainage systems for the infiltration of surface water to the ground; and no piling.

Sport England

- 4.9 The following is a summary of their response:
- 4.10 The proposal will result in the loss of squash courts and an indoor bowling rink.
- 4.11 Sport England has been working with Reading Borough Council in the past on producing an evidence base for the replacement/enhancement of the city's leisure stock. It identified the need to replace the current leisure centre. Sport England, therefore, considers this proposal addresses an identified need for this facility type and has the potential to be of benefit to the development of sport. We would wish to see this accorded an appropriate weight in the decision that is reached on this application.

- 4.12 Sport England carried out a number of consultations with specific NGBs whose sports would be impacted by the proposed new leisure centre.
- 4.13 I have reviewed the design and I have a number of concerns including on disability and diversity grounds based on the make up of the population in Reading.
- 4.14 There is a strategic justification for the need for the new leisure centre. I would strongly advise that the applicants engage with the concerned National Governing Bodies (NGBs) to resolve the outstanding issues. I would also advise the applicants to ensure the design of the new leisure centre reflects the needs of the local community.
- 4.15 Sport England does not raise an objection to the granting of planning permission for the proposed new leisure centre.
- 4.16 **Planning Officer Note:** The applicant has confirmed that detailed design items are being addressed through design workshops with Sport England (last held 1st and 12th March 2021), with internal layouts being adjusted accordingly. Also RBC and GLL have engaged further with NGBs as follows:
- England Netball
 - Volleyball England
 - British Gymnastics
 - England Handball
 - Table Tennis England
 - British Wheelchair Basketball
 - Basketball England
 - Swim England
 - Badminton England
- 4.17 The applicant also confirmed *“The following were consulted in detail as both bowls and squash are not being re-provided in the new centre:*
- *English Indoor Bowls Association - RBC have consulted EIBA both separately and through Sport England since October 2020, with a detailed response still awaited. Sport England note that EIBA requested re-provision of bowls within the new sports hall, but that this is impractical due to the length of the bowls rinks being longer than the sports hall*
 - *Rivermead and Whiteknights Bowls clubs - RBC and GLL have also engaged with both these clubs, with discussions ongoing. RBC has assessed that membership numbers of these clubs are declining and are discussing merging the two clubs at the Whiteknights facility in Earley.*
 - *England Squash - RBC have consulted with them since October 2020, and are still waiting for a detailed response. Sport England*

note that there are sufficient squash facilities in the locality to serve squash players who may be displaced from Rivermead.”

Non-statutory

Access Officer

4.18

1. Footpath surfaces must be suitable for all; tarmac and bonded gravel are both good surfaces for wheelchair users, scooter users, etc.
2. Lighting is very important, especially for those with visual impairments and cognitive impairments; bad lighting can cause confusion. People using wheelchairs and scooters, and those with walking difficulties also need to be taken into consideration; you need to be able to see hazards, and areas where there are gaps between the lighted areas can be very disconcerting, especially where there is a change of level, no matter how slight.
3. I am concerned that knee rails could be a trip hazard for blind or visually impaired people.
4. It might be best to have a mix of seating; some with backs, some without, some with arms, some without. None should be too low or too high. There should be a “clutter zone” for street furniture so that people know where they can walk safely, if they cannot see, or if they have dementia, etc. Colour and contrast is very important for people who have trouble with vision or cognition.
5. Tree pits could be a trip hazard and also dangerous for wheelchair users and those with walking difficulties if not carefully maintained and planned.
6. Shared footpaths are not at all popular with many disabled people, especially visually impaired or blind people.
7. Barrier matting must be suitable for wheelchair users and those who have walking difficulties.
8. I am very pleased to see a Changing Places facility included in the plan.
9. I am unsure if “Grasscrete” is suitable for wheelchair users and those with walking difficulties to move on.
10. Coloured tarmac and other differing types of paving would be useful for some people, especially in areas where cars and people will be in the same area.

4.19 ***Planning Officer note:*** The applicant confirmed that a number of matters including footpath surfaces, seating, lighting, barrier matting, colours of tarmac/ surfaces would be detailed at the next design stage and would be provided as part of submissions to discharge conditions. An amendment removed the grasscrete and replaced it with planting. It was confirmed that knee rails would be kept to a minimum.

Ecology

4.20 To be reported in an update.

Environmental Health

- 4.21 Noise generating development - The submitted noise assessment has been carried out in accordance with BS4142:2014 and the methodology has been correctly applied. The assessment concludes that the specific noise level of the proposed plant will not exceed - 10dB below the background noise and the rating level does not exceed the background noise so adverse impact on the local noise climate is unlikely. I therefore have no objections to the proposed plant subject to the following condition: N8 - Noise Levels of Plant/ Equipment Restricted.
- 4.22 Kitchen Extraction - odour - No further information is required due to the low risk cooking type that will take place (reheating).
- 4.23 Air Quality - Increased emissions - The air quality assessment concludes that there will be no adverse impact on air quality due to the proposed development as the transport assessment has concluded that there will be no increase in vehicle journeys in comparison to the existing leisure centre. I question that conclusion, as due to the significant improvement in facilities at the proposed new leisure centre, surely this will attract more customers who are likely to arrive by car? Will any electric charge points be provided in the car park?
- 4.24 Contaminated Land - The contaminated land risk assessment concludes that gas protection measures will be required. Therefore, a condition is recommended for further details on the proposed remediation scheme to be submitted for approval.
- 4.25 Some contaminants have been found in the soil but these are not higher than the threshold values for the proposed use. However, has this taken into account the proposed new children's play area?
- 4.26 The locations sampled are under the proposed building footprint. Have the areas of soft landscaping been sampled and taken into account in the risk assessment?
- 4.27 Recommended conditions: Land Gas - remediation scheme submission and implementation; CO6 - Unidentified Contamination.
- 4.28 Light - I am satisfied with the design of the proposed lighting scheme subject to the following condition: N21 - Hours of Operation (External Lighting).
- 4.29 Construction and demolition phases - We have concerns about potential noise, dust and bonfires associated with the construction (and demolition) of the proposed development and possible adverse impact on nearby residents (and businesses). Fires during construction and demolition can impact on air quality and cause harm to residential amenity. Burning of waste on site could be considered to be harmful to the aims of environmental sustainability.

Conditions are recommended for the submission and approval of a construction method statement, hours of construction and demolition, and no burning on site.

- 4.30 Bin storage - rats - There is a widespread problem in Reading with rats as the rats are being encouraged by poor waste storage which provides them with a food source. Where developments involve shared bin storage areas e.g. flats and hotels there is a greater risk of rats being able to access the waste due to holes being chewed in the base of the large wheelie bins or due to occupants or passers not putting waste inside bins, or bins being overfilled. It is therefore important for the bin store to be vermin proof to prevent rats accessing the waste. A condition is recommended.
- 4.31 **Planning Officer Note:** The applicant provided a response to the issues raised by the Environmental Health (EH) Officer with regard to confirming:
- That a number of existing facilities would not be replaced, which would reduce the overall user numbers;
 - There would be 40 no. designated electric vehicle sharing points;
 - That with regard to contaminants there were no samples tested directly where the play area will be located, along with some other areas of proposed soft landscaping, because the current leisure centre building envelope covers these areas. In order to address concerns about possible soil contamination in these (currently) inaccessible areas, it is proposed that samples are taken once the existing building is demolished. If results come back with exceedance for “Park” threshold in these areas, it is proposed to remove 600mm thickness of ground locally and replace with new granular material and topsoil, or similar through agreement with the EHO. Elsewhere on the site there have been no exceedances for the “Park” threshold.
- 4.32 The EH Officer confirmed that the response was satisfactory and that a further condition requiring further sampling would be required.

Natural Environment (tree officer)

- 4.33 *A summary of the original comments are as follows:* Trees - The Arboricultural documents confirm that 18 ‘C’ category trees will require removal to facilitate the development (building, car park, access or landscaping) and a further 6 trees require removal on arboricultural grounds - total 24.
- 4.34 I have concern over the felling of a few trees, which appear to be healthy. A plan needs to be submitted, which shows all trees (including those to be removed). Further discussion is required about potentially retaining some of these trees.
- 4.35 I note that several public comments have pointed out that some trees have not been included in the survey. Specific comments were received from Caversham Globe [Their comments in full below]. An

amended tree survey and AIA are required to respond to the queries raised to include the missing trees or explain their omission.

4.36 As indicated in the Arboricultural document, an Arboricultural Method Statement will be required which will need to cover all phases of development.

4.37 Landscaping - Landscaping principles have been provided which are generally acceptable, but it is disappointing that no species palette has been provided. There are some factors that need to be considered in the final design:

- There is no mention in the SUDs section about potential trees and SUDs combined - the two can be mutually inclusive. This should be the default option in order to provide greater wildlife benefits and a complete redevelopment provides the opportunity for creative landscaping to include SUDs rather than just the provision of underground attenuation tanks - the drainage strategy should be reconsidered.
- Tree Planting across the car park (avenue either side of walkway) - the provision of soft beds for these trees is positive. The soil volume provision of these beds will need to be provided to demonstrate that it is sufficient
- Tree species - I note the intention to plant all native trees, which is positive, however the planting palette can include some non-natives as long as they are wildlife friendly. Inclusion of exotic species will be necessary long term to create a greater tree stock diversity and resilience to climate change. Large canopy trees should be included wherever feasible for maximum environmental benefits. Some evergreen tree species should be included, particularly on the northern side, to help provide all year-round screening. The overall landscaping (trees) should aim and demonstrate that it follows the 30:20:10 ratio, i.e. no more than 30% from any one family, 20% from any one genus and 10% from any one species. It should also be demonstrated that there will be a net gain in tree number (a 2:1 has been suggested in the submissions).
- Future submission will need to clarify the works to the retained trees along the culvert/ditch and habitat improvements along this area.

4.38 Visual impact (from the Thames / Major Landscape Feature - The land to the north and west of the site is designated under policy EN7 of the Local Plan as a 'Local Green Space & Public Open Space'. Policy EN11 relates to Waterspaces.

4.39 The redevelopment of the site is a major development in that it will be in place for many decades so is a 'once in a generation' opportunity to vastly improve, not just the facilities, but the

appearance of the building. This is extremely important given the adjacent Major Landscape Feature and likely views across the river from Caversham Court and the St Peters Conservation Area.

4.40 I can understand the principle of use of lighter cladding at a higher level as this will blend better into the background/sky. However, it is reasonable to question whether the cladding is the most appropriate material that could be used adjacent to this important natural setting. It is particularly disappointing that nowhere on the building have green walls or roofs been proposed given the setting - the use of these is supported by our SPD Sustainable Design and Construction, our revised Tree Strategy and Revised Biodiversity Action Plan. I don't consider that the proposal has maximised its response to the setting or the biodiversity opportunities.

4.41 In conclusion, there are a number of matters that require further consideration in order to fully respond to our tree, landscape and biodiversity aims and policies and to better reflect the setting of the proposal. I support the principle of the development in tree and landscape terms, but work is required to ensure that it fully meets policies and to be a building for Reading to be proud of now and in the future, in view of the town's green aims.

4.42 **Planning Officer Note:** Following an amended AIA and responses to issues raised the Natural Environment Officer advised that *“there are some trees shown for removal, which are established trees either planted by the Council or tree wardens, and as tree establishment has been difficult in this area it would be a pity to relocate or remove and replace them if minor adjustment to the design could be made to accommodate their retention.”* Although the arboricultural issues had mostly been addressed with the amended AIA the Officer specifically asked if the following could be considered:

- 1) Whether the proposed extension to the bund, which runs east-west north of the demountable pool, could be shortened to enable the retention of an Aspen tree on the Thames Promenade?
- 2) Retention of a tree close to the existing play area.
- 3) Amendment to the shape and extent of the bund to enable the retention of some or all of 3x London Plane trees.
- 4) Acknowledgement of the younger trees established planted by tree wardens.

4.43 Further amended details were provided as documented in the Landscape Section below. The Officer maintained their position with regard to SUDS provision and green walls/ roofs.

SUDS Manager

- 4.44 The submitted drainage assessment has proposed a 50% reduction on the discharge rate for the 1 in 100 rainfall event which is deemed acceptable. However, the DEFRA standards states the following:

“S3 For developments which were previously developed, the peak runoff rate from the development to any drain, sewer or surface water body for the 1 in 1 year rainfall event and the 1 in 100 year rainfall event must be as close as reasonably practicable to the greenfield runoff rate from the development for the same rainfall event, but should never exceed the rate of discharge from the development prior to redevelopment for that event.”

- 4.45 The application includes no assessment of the 1 in 1 year event and therefore this would need to be clarified that during this event, a betterment would be provided at the very least. I would be happy with this to be in the form of a written statement, with full details provided by way of a condition.

- 4.46 **Planning Officer note:** Following confirmation from the applicant that *“...the proposed centre and associated hard landscaping provide a smaller impermeable area than the existing centre. Any storm water flow off the new development are attenuated and the flow is restricted. Therefore, the development will provide betterment to the 1 in 1 year storm event when compared against the existing discharge rates.”* The SUDS Manager confirmed that further detail would be required of the 1 in 1 year event to confirm the discharge rate, but this could be dealt with by condition: SU7 (Sustainable drainage to be approved), and SU8 (Sustainable Drainage to be implemented) the scheme was acceptable subject to conditions.

Thames Water

- 4.47 In summary:

- Waste Comments - With regard to SURFACE WATER drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection.
- Thames Water would advise that with regard to WASTE WATER NETWORK and SEWAGE TREATMENT WORKS infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.
- Thames Water recommends an informative: Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.

RBC Transport Strategy

- 4.48 The application site is currently occupied by the Rivermead Leisure Complex. The Rivermead Leisure Complex site is accessed via the

northern arm of the Richfield Avenue/Tessa Road roundabout which is provided along the southern boundary of the site. The main car park for the leisure centre is provided to the east of the existing leisure centre building providing 369 parking spaces. There are two further parking areas to the south of leisure centre providing an additional 202 overspill parking spaces.

- 4.49 The proposals are to redevelop the existing Rivermead Leisure Complex site to provide a new leisure complex with a new 25 lane competition swimming pool, café, soft play room, six court sports hall and gym. The existing demountable pool will be retained to the north of application site located adjacent to a new children’s play area.
- 4.50 A Transport Assessment has been submitted with the application. Table 4.1 outlines the existing and proposed facilities at Rivermead Leisure Complex. The majority of the facilities will be retained with some of the facilities such as the sports hall being reduced in both size and capacity, and some elements of the existing offering being lost as a result of the proposals.

Table 4.1: Rivermead Leisure Complex Existing and Proposed Facilities

Facility	Existing	Proposed
Demountable swimming pool	✓	✓
Lagoon swimming pool	✓	✗
Sports hall	✓ x10 badminton courts	✓ x6 badminton courts
Event space (standing 1,650/seated 1,800)	✓	✗
Squash courts	✓ x3	✗
Indoor bowls hall	✓	✗
Creche	✓	✗
Multi-purpose artificial pitch	✓	✓
Gym	✓ 120 stations	✓ 125 stations
Cafe	✓	✓
Competition swimming pool	✗	✓
Teaching/diving pool	✗	✓
Parking	596 total provision	390 total provision

4.51 Although the competition/diving pool represents a new offering, it is stated that the programme of swimming sessions and events at the centre is to remain the same and split across the retained demountable pool and the new competition pool so the use of each will be less intensive than the current usage. It is important to note that although the same programming is to be retained the timetabling of classes and events may be subject to change.

4.52 To accompany the planning application a Transport Assessment has been submitted and I comment on this as follows:

Site Accessibility

4.53 The site is located within the existing Rivermead Leisure Centre complex and benefits from the existing network of footways to

Richfield Avenue and the Thames Path. The Thames Path runs along the river north of the site.

- 4.54 Richfield Avenue is lit and served with footways approximately 1.5-2.0m wide on both sides of the carriageway. Pedestrian refuges are provided along the route and a pelican crossing is present 395m east of the site access, near the roundabout with the A4155.
- 4.55 An assessment of the pedestrian facilities has indicated that all signal-controlled pedestrian crossings have an audible signal for those with a visual impairment whilst tactile paving and dropped kerbs are provided at all local junctions and pedestrian crossing points.
- 4.56 Continuous cycle connections are provided from the site to the various surrounding residential areas. The R40 route is a locally signed cycle route connecting Emmer Green and Caversham Heights to the Rivermead Leisure Complex. It runs from the north across Caversham Bridge and along the shared pedestrian/cycle footway on Richfield Avenue. NCN Route 5 is provided adjacent to the River Thames approximately 660m east of the site.
- 4.57 In terms of public transport, there is a single bus stop immediately outside the site. It is served by the 42 and the 60a with a 40 minute frequency in core areas.
- 4.58 Overall the proposed development is in a sustainable location that allows for alternative modes of travel to be utilized to access the site.

Proposed Development Trip Generation

- 4.59 The proposals are to redevelop the existing Rivermead Leisure Complex site to provide a new leisure complex with a new 25 lane competition swimming pool, café, soft play room, six court sports hall and gym, alongside the existing demountable pool which would be retained as part of the proposed scheme. The existing multi-purpose artificial 3G football pitches would also be retained.
- 4.60 Due to the ongoing COVID-19 pandemic, the Rivermead Leisure Complex site is not fully operational. It is therefore agreed that the existing trip generation of the site can be calculated using the 2016 Automatic Traffic Count Survey (ATC) data used as part of the planning application for the demountable swimming pool on the site (App ref: 162323).
- 4.61 As the majority of the existing uses are to be retained as a result of the proposals and the events / classes are to remain as existing with the same clubs / societies utilising the facilities, the baseline traffic generation figures derived from historic operational information of the existing site would be applied to the new proposals.

- 4.62 As stated previously, the proposed leisure centre is to serve generally the same purpose as the existing Rivermead Leisure Complex. Therefore, the proposed 25 competition lane swimming pool is considered to be the sole additional trip generating element of the proposed redevelopment in this assessment.
- 4.63 However, it is stated that the existing classes/events timetable currently accommodated by the demountable pool would be split across the two pools once the works are complete with no notable intensification of swimming events proposed. The diving/teaching swimming pool is also considered to be ancillary to the new 25m swimming pool and therefore it is not considered that this element of the development would generate any additional trips to the site. Therefore, the proposed development is therefore not forecast to generate significantly more trips than the existing leisure centre uses on the site given that the programme of swimming sessions and events is intended to stay largely the same.
- 4.64 The redevelopment proposals are not forecast to generate a material increase vehicle movements to and from the site and, therefore, the site operation of the access junction and local highway network would not be impacted by the development proposals.

Access

- 4.65 Vehicular access to the site from the local highway network will continue to be served via the Richfield Avenue/Tessa Road roundabout to the south the site. All internal access roads are to measure 6m in width allowing two-way vehicle movement throughout the site.
- 4.66 An annotated plan showing the proposed layout and access arrangements of the development proposals are included at Figure 4.1 of the TA. It is indicated that the main car park access routes will operate as a in/out arrangement. However, no directional signage or markings has been illustrated on the proposed site plan to ensure that priority movement is given to vehicles entering the site to prevent vehicles queueing back to Richfield Avenue. This needs to be addressed but I am happy for the details to be covered by condition and submitted prior to occupation.
- 4.67 The layout includes the provision of two dedicated setting down/drop off spaces adjacent to the main entrance of the building. The existing vehicular access route to overflow parking to the west of the main access, adjacent outdoor activity centre will remain in its current position. The access route to the overflow parking to the east of the main access road will be repositioned and slightly staggered to improve priority.
- 4.68 Internally, footways and footpaths are to be provided within the site with zebra crossing facilities provided linking the car park to the new building access and a landscaped public realm area adjacent to the

building frontage. This area of public realm will link to the existing footpaths providing connections to the Thames Path.

- 4.69 22 disabled parking spaces are sited close to the building entrance. Level access will be provided from the disabled parking spaces to the building entrance for visitors using mobility assistance such as wheelchairs, electric scooters and for carers with buggies.
- 4.70 Cyclists would continue to access the site via the northern arm of the Richfield venue/Tessa Road roundabout with connection to the existing cycling routes on Richfield Avenue.
- 4.71 Swept path analysis has been carried out for the vehicular access and is deemed acceptable.

Parking

- 4.72 In accordance with the NPPF, development should provide car parking and cycle parking that is appropriate to the type, mix and use of development; accessibility of locations within the Borough to sustainable transport facilities, particularly public transport; and local car ownership levels.
- 4.73 Policy TR5 states that 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. It goes on to say that ensuring the appropriate level of car parking in new developments involves striking a careful balance. On the one hand, it is important that enough parking is provided so that there is not a knock-on effect on the safety and function of the highway and public transport network through on-street parking. On the other hand, an over-provision of car parking, particularly at places of work, can lead to less sustainable travel choices.
- 4.74 Local parking standards are set out in the Council's Revised Parking Standards and Design Supplementary Planning Document (SPD). The site is located in Zone 2, Primary Core Area, which directly surrounds the Central Core Area and extends to walking distances of 2 kilometres from the centre of Reading.
- 4.75 There are no specific parking standards for leisure complexes such as that provided at Rivermead however maximum parking standards are provided for some of the individual elements within Rivermead Leisure Complex. These are set out in Table 4.2.

Table 4.2: RBC Parking Standards

Facility	Parking Standard (Zone 2)
Playing Fields	12 spaces per hectare of pitch area
Swimming Pools	1 space per 7.5 fixed seats & 1 space per 15 m ² pool area
Health Clubs/Gymnasiums	1 space per 35 m ²

4.76 The Reading BC Revised Parking Standards and Design SPD also outlines the suggested level of accessible and family/toddler spaces for developments in all zones as follows:

- Up to 200 spaces provided - 3 disabled spaces or 5% of total capacity, whichever is greater; and
- Up to 200 spaces provided - 2 spaces or 4% of total capacity, whichever is greater.

4.77 In addition to the above, RBC Local Plan Policy TR5 states that 10% of car parking spaces provided should provide an active charging point for Electric Vehicles (EV).

4.78 The proposed leisure centre is to serve generally the same purpose as the existing Rivermead Leisure Centre with a reduction in dry facilities (including the removal of the large event space provision) and an increase in wet facilities (including a splash pad, an 8-lane competition pool and a teaching/diving pool.) It is stated that the programme of swimming sessions and events at the centre is to remain the same and split across the retained demountable pool and the new competition pool so the use of each will be less intensive than the current usage.

4.79 As there are no specific parking standards for sports complexes and the parking standards for individual uses do not cover all of the facilities provided, parking levels for the proposed development have been calculated using historical data including both an ATC and parking beat survey that were conducted at the site in October 2016 as part of the consented planning application for the demountable pool app ref; 162323. Given the ongoing COVID-19 pandemic, this approach is acceptable.

4.80 The daily profiles of total vehicle arrivals and departures to and from the proposed Rivermead Leisure centre redevelopment have been used in order to predict the peak level of parking required at the site during a Monday (busiest day at the centre) and a Saturday. The resulting Monday parking accumulation is presented in Table 5.4.

4.81 The above parking accumulation indicates that there is likely to be a maximum parking demand of 369 parking spaces by the proposed redevelopment at any one time during an average Monday.

4.82 The Saturday parking accumulation is presented in Table 5.5.

- 4.83 The above parking accumulation indicates that there is likely to be a maximum demand of 270 car parking spaces during an average Saturday at the redeveloped Rivermead Leisure Complex site.
- 4.84 A total of 112 standard car parking spaces are to be provided within the new main car park with an additional 22 dedicated disabled bays, 14 family/toddler spaces and 40 Electric Vehicle charging spaces. In addition to the new main car park it is proposed that the existing overflow car parks to the south of the Rivermead Leisure Complex site are retained as part of the proposals. These overflow car parks provide an additional 114 and 88 standard car parking spaces respectively.
- 4.85 Overall a total of 390 parking spaces will be provided on site. All standard car parking spaces are designed to be 2.5m x 5m whilst all disabled and family parking bays are designed to be 2.4m x 4.8m with a 1.2m buffer to the side and to the rear in line with guidance set out in the RBC Revised Parking Standards and Design SPD.
- 4.86 The provision of 390 car parking spaces across the site is therefore considered appropriate to serve the proposed development.

Cycle Parking

- 4.87 The standards for cycle parking are also contained within the Revised Parking Standards and Design SPD. There are no specific standards applicable to the site as a whole with only standards for individual facilities provided, however these do not cover all of the facilities offered at the site.
- 4.88 To identify what level of cycle parking would be required the applicant has undertaken a review of the multi-modal trip rates obtained from TRICS and this indicates that a forecast 3% of patrons travelling to the proposed redeveloped leisure centre would do so by cycle.
- 4.89 Based on 3% of visitors to the site cycling a total of 27 cycle parking spaces could be required during the peak accumulation time at the site.
- 4.90 A total of 40 cycle parking spaces in the form of 20 Sheffield stands are proposed for the redevelopment of the Rivermead Leisure centre located in close proximity to the building entrance. It appears that 10 cycle parking spaces will be provided within a covered enclosure. Full details should be covered by condition (*Planning officer note - all proposed cycle spaces would be covered*)

Servicing

- 4.91 The bin store and substation is to be provided adjacent to a turning head north of the new car parking areas. Service vehicles would enter the site from the Richfield Avenue/Tessa Road roundabout and continue north along the main access road towards the north of the

car parking before turning right up a ramped access road which provides access to the turning head adjacent to the bin store and substation.

- 4.92 A secondary servicing area is also provided directly adjacent to the eastern frontage of the leisure centre building. A turning head is provided to allow a service vehicle to enter and exit the site in a forward gear.
- 4.93 Swept path analysis of the site servicing arrangement has been reviewed and is deemed acceptable.
- 4.94 There are no transport objections to this application subject to the following conditions: Construction Method Statement, vehicle parking as specified, vehicular access as specified, cycle parking to be approved, refuse and recycling, EV charging points, a plan to show direction signing and markings within the car park, and a highways informative.

Public consultation

- 4.95 The consultation undertaken with RBC's Planners, stakeholders, and statutory consultees, prior to the submission of the application, is fully detailed in Section 8. of the submitted Integrated Planning, Design and Access Statement.
- 4.96 Following the submission of the application the scheme was presented to the Sports Forum on 21st January 2021, with the opportunity for questions, and included the following organisations:
Reading Roadrunners
Burghfield FC
Reading Athletics Club
Reading Rockets Basketball
5 a-side and walking football
Reading Judo Club
Reading Underwater Hockey
Albatross Diving Club Reading
Rivermead Badminton Club
Reading Swimming Club
Reading FC Community Trust
Sport in Mind
Woodley Untied FC
Meadway and Rivermead Squash Club
South Reading Football Club
- 4.97 The following addresses were consulted and site notices were displayed:
- The Boathouse, 1 Thameside Promenade
 - The Toby Carvery, Richfield Avenue
 - Express By Holiday Inn Reading, Richfield Avenue
 - Premier Inn, Richfield Avenue
 - Crowne Plaza Hotel
 - 14-18 (even) & 20-22, 24, 26, Richfield Avenue

- Kwik Fit, Richfield Avenue
- Unit 3-5 Tessa Road
- Reading Festival
- 8 Tessa Road

4.98 A video of the proposals was available to view online via the RBC and Get Reading websites from 3rd February 2021, which was a joint approach by the applicant and RBC, Leisure.

4.99 3 no. objections and 7 no. observations were received. Full neighbour/organisation consultation comments are available to view on the Council's website. A summary is provided below:

- The buildings will be more visible in the winter when there is no leaf canopy.
- The building will extend further east and will be more visible than the present building.
- Further planting will be required to extend the current screening belt around the demountable further east to the north of the existing play area.
- Proposed removal of a number of mature and semi-mature trees is a concern especially those more recently planted, which struggled to establish and are only now beginning to put on growth. Mature trees should be kept.
- Not all trees are shown on the landscaping plan.
- A green roof would help meet environmental aims.
- It should be of a more appropriate design & cladding material for this highly sensitive riverside park setting. Blue and white cladding would make the building stand out and would not enhance the aesthetic. Suggestions of natural greens, browns, off white would be more appropriate.
- Pool too small should be 50m
- Spoil mounding and landscaping must not increase flood risk.
- Could trees in the car park be placed to avoid 'doughnuts'?
- It is disappointing that a number of properties have been missed from the Built Heritage Townscape & Visual Impact Appraisal report.
- Timber knee rails are not sufficient to stop vehicles accessing the Thames Promenade, they should be metal.
- A number of conditions applied to permission 162323 [demountable pool] should be applied - use of the land should only be for sport and leisure and not for concerns, films etc, hours of construction, 10-year landscape management plan, no increase in flood risk, building should be green.
- The loss of squash and bowls at Rivermead is extremely unwelcome.

Caversham Globe

4.100 **Planning Officer note:** Their comments mostly related to landscaping details. In summary they stated:

- Plans seem to indicate that a number of trees will be removed. The plans therefore need to clarify that they will be retained and protected - Specifically: 1 x Aspen, 4 x Oaks, 6 x Lime and 1 x Field maple. The following are mature or semi-mature trees within the site which appear to be proposed for removal unnecessarily - 3 London Planes, 5 willows.

CADRA

4.101 CADRA welcomes this updating of a popular and well-used facility. Our comments concern its impact on views across the river from St Peter's Church, St Peter's Conservation Area and Caversham Court Gardens, and especially its landscaping.

1) The proposed building, while fairly standard for this type of facility, is an improvement on the existing and provides a welcome move of the main structure further from the river. We urge that great care is taken with the selection of external finishes, to avoid either bright colours or reflective surfaces, because of its continued high visibility from the Conservation Area etc. Local Plan Policy EN5 (Protection of Views with Heritage interest) identifies views upstream from Caversham Bridge as worthy of protection. The underpinning Views Study, at para 1.1.11, says that development within or on the fringes of the water meadows should be low rise and *of appropriate non-reflective materials*.

We welcome the statement in the supporting lighting analysis that upward glare will be avoided, and ask that this aim be rigorously pursued.

2) We note that the demountable pool is to remain. This is perhaps the least attractive part of the existing structure and is nearest to the river. The application appears silent on its treatment, and we suggest that low-cost means of reducing its impact (possibly as part of the landscaping) be investigated, unless this is just a temporary structure until the new pool is completed.

3) Our main point, however, concerns landscaping. The tone of the Design and Access Statement is strongly that Richfield Avenue is the 'front' of the development (see sections 4.1, 4.3.1 and 4.3.2, for example) and that the Thames frontage is 'round the back'. We feel the opposite emphasis would be correct: Richfield Avenue is never going to be a beautiful environment, but the Thames path could and should be. Given its proximity to the riverside walk and importance in sensitive cross-river views, landscaping of the northern side should therefore be one of the best-developed aspects of the project. However, the submitted details are scanty and consist of placing excavated spoil on top of existing mounds and planting on top of that, the details of which are largely absent.

We feel this is a serious missed opportunity. This riverside area is potentially of great benefit to Reading as a whole. This application,

and the proposed school just upstream, offer a unique chance to create a joined-up landscape plan for the whole of this riverside meadow area, to which these two proposals plus any subsequent ones can incrementally conform and contribute, along with any other ad hoc resources which might arise. It could also incorporate any essential festival needs, could include enhanced bio-diversity, and could investigate flood amelioration through planting. Such potential was partly recognised in the Council's Thames Parks Vision Statement of 2004.

The result would be a great improvement on the current rather barren appearance of this important asset and we urge that this opportunity should not be missed, rather than relying on separate, ad hoc and limited-impact landscaping for each project as it emerges. The Built Heritage, Townscape and Visual Impact Appraisal may well be correct in concluding that the proposals would have limited impact, in the sense of not making things worse, but it fails to identify the potential for making them considerably better. A bolder, more imaginative and above all comprehensive landscaping strategy for the wider area is the key to doing so.

5 RELEVANT PLANNING POLICY AND GUIDANCE

- 5.1 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) (2019) which states at Paragraph 11 "Plans and decisions should apply a presumption in favour of sustainable development". The relevant sections of the NPPF are:

National Policy

- 5.2 National Planning Policy Framework (NPPF)
Section 2 - Achieving Sustainable Development
Section 6 - Building a Strong Competitive Economy
Section 8 - Promoting Healthy and Safe Communities
Section 9 - Promoting Sustainable Transport
Section 11 - Making Effective Use of Land
Section 12 - Achieving Well-Designed Places
Section 14 - Meeting the Challenge of Climate Change, Flooding and Coastal Change
Section 15 - Conserving and Enhancing the Natural Environment
Section 16 - Conserving and Enhancing the Historic Environment

Adopted Reading Borough Local Plan - November 2019

- 5.3 The Development Plan is the Reading Borough Local Plan (November 2019) (RBLP). The relevant policies are:

Policy CC1: Presumption in Favour of Sustainable Development
Policy CC2: Sustainable Design and Construction

Policy CC3: Adaptation to Climate Change
Policy CC4: Decentralised Energy
Policy CC5: Waste Minimisation and Storage
Policy CC6: Accessibility and the Intensity of Development
Policy CC7: Design and the Public Realm
Policy CC8: Safeguarding Amenity
Policy CC9: Securing Infrastructure
Policy EN1: Protection and Enhancement of the Historic Environment
Policy EN7: Local Green Space and Public Open Space (EN7wp)
Policy EN10: Access to Open Space
Policy EN11: Waterspaces
Policy EN12: Biodiversity and the Green Network
Policy EN13: Major Landscape Features and Area of Outstanding Natural Beauty
Policy EN14: Trees, Hedges and Woodland
Policy EN15: Air Quality
Policy EN16: Pollution and Water Resources
Policy EN17: Noise Generating Equipment
Policy EN18: Flooding and Drainage
Policy TR1: Achieving the Transport Strategy
Policy TR2: Major Transport Projects
Policy TR3: Access, Traffic and Highway-Related Matters
Policy TR4: Cycle Routes and Facilities
Policy TR5: Car and Cycle Parking and Electric Vehicle Charging
Policy RL2: Scale and Location of Retail, Leisure and Culture Development
Policy RL5: Impact of Main Town Centre Uses
Policy WR3: Other Sites for Development in West Reading and Tilehurst (WR3d)

5.4 Supplementary Planning Guidance/Documents

- Employment, Skills and Training (Apr 2013)
- Sustainable Design and Construction (Dec 2019)
- Revised Parking Standards and Design (Oct 2011)
- Planning Obligations Under Section 106 (Apr 2015)

5.5 Other Relevant Documents

- Tree Strategy (2020)
- St. Peter's Conservation Area, Conservation Area Appraisal (Nov 2018)
- RBC Corporate Plan (2018)

6. Environmental Impact Assessment

6.1 Under Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended¹) the proposed

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The Town and Country Planning and Infrastructure Planning (Environmental Impact Assessment) (Amendment) Regulations 2018 – SI 2018/695; Town and Country Planning (Development

scheme falls under 10. Infrastructure Projects (b) Urban Development Projects, which includes the construction of shopping centres, car parks, sports stadiums, leisure centres and multiplex cinemas and the development would include more than 1 hectare. Therefore, under Regulation 6 the applicant submitted an EIA Screening request for the Local Planning Authority (LPA) to determine whether the scheme would have a likely significant effect on the environment for which a full Environmental Statement (ES) would be required. This was submitted alongside the submission of the full application, which is allowable under the Regulations.

- 6.2 It is the LPA's opinion that the proposed development does not fall specifically within the sensitive areas as defined under Regulation 2(1) of the Regulations. The National Planning Policy Guidance (NPPG, Environmental Impact Assessment, May 2020) recognises that local designations, which there are in this case, may also be relevant in determining whether an EIA is required. The site is within a Major Landscape Feature and adjacent to a Local Green Space.
- 6.3 In order to determine whether a Schedule 2 project is likely to have significant effects a LPA must take account of the selection criteria in Schedule 3 of the Regulations. Not all of the criteria will be relevant in each case and the National Planning Policy Guidance (NPPG, Environmental Impact Assessment, May 2020) states that *"Each case should be considered on its own merits in a balanced way"*.
- 6.4 The NPPG indicates that for urban development projects an EIA is *"unlikely to be required for the redevelopment of land unless the new development is on a significantly greater scale than the previous use, or the types of impact are of a markedly different nature or there is a high level of contamination."* And the key issues to consider are *"Physical scale of such developments, potential increase in traffic, emissions and noise"*.
- 6.5 To determine whether a proposed development is likely to have significant effects on the environment a LPA needs to consider it against the selection criteria set out in Schedule 3 of the Regulations (included in Appendix 1 below), which cover characteristics of the development, the location of the development and types and characteristics of the potential impacts.
- 6.6 The LPA has assessed the submitted screening request (Gillings Planning, Ref: GLL1001 dated 1st December 2020).
- 6.7 In terms of characteristics the proposed scheme would be similar to the existing leisure centre and the overall built form would be slightly smaller than existing, and indeed would in itself be less than

1ha. It is therefore considered it would be of an appropriate scale in relation to the site and surrounding area.

- 6.8 The focus of the proposed scheme would reflect a more sustainable modal shift and is likely to have fewer impacts compared to the existing development.
- 6.9 It is not considered that there would be significant environmental effects with respect to landscape and visual impacts, and any effects and mitigation could be adequately addressed through the submission and assessment of standard technical documents as part of the planning submission.
- 6.10 The proposal would use a previously developed site in an established urban area and would not have an impact on the absorption capacity of the natural environment.
- 6.11 It is not considered that the types and characteristics of the potential impacts of the proposed scheme would be significant and not considered likely to extend beyond the immediate environs of the site nor of a scale likely to give rise to significant environmental effects. **The LPA therefore, considers that the proposed development is not EIA Development and an Environmental Statement is not required.**
- 6.12 It is considered that the potential impacts associated with the proposed scheme can be adequately addressed through the application submission documents as part of this application and any effects capable of being mitigated.

7 APPRAISAL

The main matters to be considered are:

- Principle of Development
- Design considerations and the effect on the Major Landscape Feature, Heritage Assets and Open Space
- Transport/ Parking
- Landscaping, Ecology & Open Space
- Sustainability
- Environmental Matters - Contamination, Flood Risk, Air Quality & Noise
- Infrastructure requirements
- Other Matters
- Equalities impact

Principle of Development

- 7.1 Policy CC1 of the Reading Borough Local Plan (RBLP) requires a positive approach to development proposals that reflect the

presumption in favour of sustainable development, which lies at the heart of the National Planning Policy Framework (NPPF).

7.2 It goes on to state that *“Planning applications that accord with the policies in the development planwill be approved without delay, unless material considerations indicate otherwise.....”*

7.3 The proposed site is a specific allocation under the Reading Borough Local Plan (RBLP) Policy WR3d:

“Additional development to improve the town’s leisure offer, including new swimming provision. Development should:

- *Address any contamination on site; and*
- *Address flood risk issues arising from a Flood Risk Assessment.*

3.75 ha Additional leisure floorspace”

7.4 Paragraph 86 of the NPPF states that *“Local planning authorities should apply a sequential test to planning applications for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan.”* As the proposed scheme would accord with an up-to-date plan with respect to it being an allocated site under WR3d no sequential test will be required in this instance. However, the proposal itself will need to meet other policy requirements as identified below.

7.5 The general principle of re-use for a new leisure centre would therefore be acceptable and Policy WR3d has been subject to sustainability appraisal as part of the local plan process.

7.6 The need for a replacement leisure centre at Rivermead forms part of the conclusions of a borough-wide assessment of leisure provision, and part of a long- term leisure contract.

7.7 The three overarching objectives to achieving sustainable development within the Framework are defined as economic, social and environmental. The economic role requires proposals to contribute to building a strong, responsive and competitive economy. The social role requires planning to support strong, vibrant and healthy communities and a high-quality built environment. The environmental role requires the natural, built and historic environment to be protected and enhanced with mitigation and adaptation to climate change; this will be addressed below.

7.8 The proposals would contribute to economic activity both through the construction period and as part of the ongoing operation of the leisure centre.

7.9 In terms of social, the provision of a new leisure centre responds to leisure needs, which have been assessed as part of a borough-wide approach. Paragraph 91 of the NPPF specifically supports planning

decisions which achieve healthy places and: “enable and support healthy lifestyles, especially where this would address identified local health and well-being needs - for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling” (91 c)). Para 92 states: “To provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should: a) plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments”; and b) take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community...”

- 7.10 The provision of leisure would also accord with a number of corporate priorities as set out in the Council’s Corporate Plan 2018 - 2021 (refreshed in June 2019), including: ‘Promoting health, education, culture & wellbeing’. This is further reflected in the RBLP objectives (Para. 2.2.2):

3. Improve the quality of life for those living, working, studying in and visiting the Borough,with good access toservices and facilities (such as, sport and recreation, etc.) to meet identified needs;

8. Offer outstanding cultural opportunities, which are based on leisure and visitor facilities;

- 7.11 Reading Borough Local Plan (RBLP) Policy RL2: Scale and Location of Retail, Leisure and Culture refers specifically to the need for replacement swimming facilities and replacement of the existing leisure centre with a pool on the same site would meet policy and Policy RL6: Protection of Leisure Facilities and Public Houses.

- 7.12 In conclusion, the principle of the use of the site for a replacement leisure centre is acceptable and this importance is reflected in the specific site allocation in the RBLP. The remainder of this report therefore considers the proposed development against other relevant policies, including with respect to contamination and flood risk, as specifically set out within the allocation policy; design, impact on the major landscape feature, as well as sustainability and energy efficiency standards, which are addressed in the sections below.

Design considerations and the effect on the Major Landscape Feature, Heritage Assets and Open Space

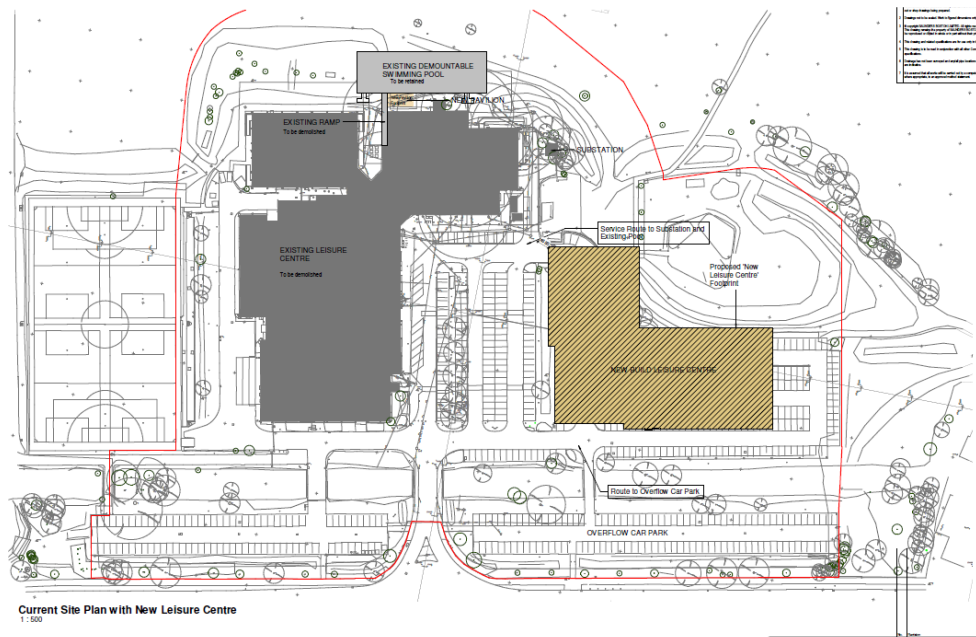
- 7.13 Paragraph 124 of the NPPF states that “Good Design is a key aspect of sustainable development” and that schemes are “visually attractive as result of good architecture and appropriate landscaping; are sympathetic to local character and history,

*including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change” and “create places that are safe, inclusive and accessible and which promote health and wellbeing..”*The NPPF states that permission should be refused for development of poor design that fails to take the opportunities available for improving character, the quality of an area and the way it functions.

- 7.14 The Government’s National Design Guide identifies a number of characteristics to consider in achieving good design, and one of these relates to the context of a site where well-designed development is that which *“responds positively to the features of the site itself and the surrounding context beyond the site boundary. It enhances positive qualities and improves negative ones.”*
- 7.15 RBLP Policy CC7: Design and the Public Realm, requires all development to be of a *“high design quality that maintains and enhances the character and appearance of the area of Reading in which it is located.”* Design includes layout, landscape, density and mix, scale: height and massing, and architectural details and materials.”
- 7.16 The proposed site is within the Thames Valley designated Major Landscape Feature (MLF under Policy EN13), and in close proximity to the River Thames (Waterspaces Policy EN11), and includes part of, but is mostly adjacent, to the Local Green Space of the Rivermead and Thameside Promenade (EN7Wp).
- 7.17 Policy EN13 states that *“Planning permission will not be granted for any development that would detract from the character or appearance of a Major Landscape Feature.”* It goes on to state that *“the extent to which new development prevents or minimises the visual impact on major landscape features and other landscape values is largely dependent on the location, design and scale of proposals.”* The supporting text states that the policy *“does not rule out development in or close to these areas, but seeks to ensure that development only takes place where it can preserve or enhance the character or appearance of the feature.”*
- 7.18 Under Policy EN11 there is the requirement for water spaces to be protected, enhanced and that *“there will be no adverse impact on the function and setting of any watercourse and its associated corridor”*.
- 7.19 Policy EN7 identifies that proposals will not be permitted that *“erode their [Local Green Space’s] quality through insensitive adjacent development....”*
- 7.20 The wider environs include Caversham Court Gardens, a Grade II Listed Registered Park and Garden, and the St. Peter’s Conservation Area. Policy EN1 states that *“Historic features, areas of historic*

importance and other elements of the historic environment, including their settings will be protected and where possible enhanced". Specifically with regard to Historic Parks and Gardens it states "Development will not detract from the enjoyment, layout, design, character, appearance, features or setting of the park or garden, key views out from the park, or prejudice its future restoration." The Conservation Area Appraisal also identifies the importance of views to and from it.

- 7.21 The submission includes a Design and Access Statement and A Built Heritage, Townscape and a Visual Impact Appraisal. (BHTVIA) The latter considers the effect of the proposed scheme on the character and appearance of the MLF and on views into and across it from the St. Peter's Conservation Area including from Caversham Bridge, The Thames Promenade and Caversham Court Gardens.
- 7.22 The applicant has referenced a suite of design guidance, as set out in section 4.2 of the DAS, which has informed the design, including a whole range of Sport England design guides and design standards set by National Governing Bodies (NGBs). The overall design approach is therefore, strongly defined by the specific requirements for particular spaces and functions for a leisure centre, which leads to large rectangular spaces. The activities within then further limits the options for creating vistas into and out of the facility.
- 7.23 It has also been necessary to consider the buildability of the scheme and to take account of access requirements for the Reading Festival and other Thames Park events, as well as siting the proposed building to enable the retention of the existing leisure centre during the construction. The proposed scheme has also sought to include measures to contain the overall footprint, such as including the use of bleacher seating for spectator seating.
- 7.24 Measures to ensure the sensitive treatment of the site in the context of the MLF have also been fully considered and incorporated into the overall design approach and are described further below.
- 7.25 The proposed building would be a contemporary flat roofed design located to the east of the site on the existing parking area. It would include three connected key buildings in an 'L' shape: 'hub', sports hall, and swimming pool. The hub forms the central proportion with the other two wings running north-south and east-west from it. The functions of the building would require large volume spaces and the layout proposed is with the aim of breaking up the overall mass.



Proposed leisure centre overlaid on existing site plan

7.26 The surrounding scale of buildings comprises two storey commercial buildings on the opposite side of Richfield Avenue and to the east the three storied Premier Inn and Crowne Plaza, slightly higher than the proposed. Overall the siting and scale and form is considered to respect the location and scale of neighbouring buildings, including the emerging school site to the west, would not be overbearing and would provide a better frontage and improved streetscape to Richfield Avenue.





- 7.27 It would have a maximum height of 12.5m (to the top of the roof top plant enclosure), which is slightly lower than the existing building (the stair towers and sports hall are approximately 13m high). Its overall footprint would be slightly smaller than the existing leisure centre, making it less prominent. The retained demountable pool, which is approx. max height of 7.7m would be to the northern side of the proposed car parking area, and the retained external courts (outside the reline) would be to the west.
- 7.28 A new plaza, including outdoor seating, would link the proposed building and the existing demountable and provide an active public realm to the site and a welcoming entrance and meeting area, which would be in stark contrast to the existing leisure centre with its entrance set a long way back and with no public space to the front



- 7.29 It is also proposed to enhance the existing entrance to the demountable pool, which is currently at over 1m above surrounding ground levels. The proposal includes new landscaping mounding to the front of the demountable and on top of this a modular entrance pavilion to provide a secure entrance for the building.
- 7.30 The smaller sports hall building would be the wing running north-south, and would be sited closest to the MLF, with the main mass of the building positioned further from the Thames and the MLF, as a means to improve its impact on the wider area. In addition, the proposed landscaping scheme would incorporate several screening measures to break up the visual impact of the proposed building. There are existing tree belts along the banks of the River Thames. There would be enhanced tree planting and mounding on the northern side to create further screening of the proposed scheme when viewed from the north. There is a current tree belt of mature trees on the north-eastern side and between this and the building an

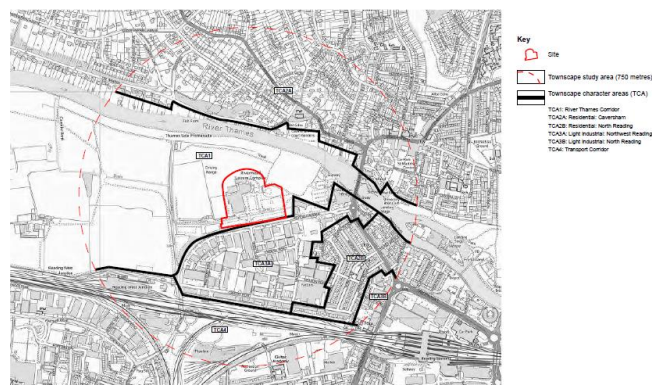
existing mound would be landscaped higher and excavated material and new soft landscaping put on top.

- 7.31 The demolition of the existing leisure centre and the siting of the proposed building to one side would open up the site and views into the MLF from Richfield Avenue, providing an enhancement to the visual links to the surroundings through the site. In contrast to the existing building, which has limited openings within the cladding, apart from high level strip windows, the proposed scheme would maximise openings, including windows front and back creating visual links through into and from the buildings, which would improve the appearance and overall presence on site.
- 7.32 In addition, the proposed building would be sited considerably closer to Richfield Avenue (80m from the access junction compared to 140m at present) which would improve its presence to the street and would allow greater public legibility with the main entrance hub closer to the road. At present, the building is somewhat hidden within the car park.
- 7.33 In terms of providing a welcoming public building the 'hub' would be given prominence through being taller than the wings either side. It would be differentiated from the other two wings, both through the use of materials and colours (dark blue and slate), but also the level of glazing, and signage. It would have a double height activity zone with full height glazing, a projecting roof with dark grey cladding, supported by angled columns with a timber soffit, and brise soleil feature. It has been designed deliberately so that it faces on to the car park entrance with the main pool hall running parallel with Richfield Avenue. The main entrance would have a small lightweight canopy with contrasting yellow/gold cladding to provide a clear entrance point. This would further provide a focal point for the building.
- 7.34 There would be a more active frontage created on the southern side, towards Richfield Avenue achieved with signage, and glazing at ground floor, to allow views out and some visibility of the activities within. Further interest to this elevation would be created through a vertical strip of glazing to the diving area and floor to ceiling glazing would be included to the fitness suite at first floor. This would make clear its function and would create a much more positive and welcoming appearance to the proposed building than the current leisure centre.
- 7.35 There would be a proposed plaza to the western side adjoining the main entrance and 'hub', which would be a pedestrian space, which would include seating, and landscaping.
- 7.36 Access to the main entrance for pedestrians would be enhanced with the extension of the pedestrian pavements, either side of the existing road bridge over the culvert, into the new car park area and

to link with the new footpath through the car park to the main entrance. There would new pedestrian paths to the north and east of the centre to link to the Thames Path and the wider Rivermead Park. These additions to the paths would create an enhanced network of pedestrian and cycling accessibility, and would serve to remove the dominance of the present parking area

- 7.37 Some of the consultation responses raised concern with the colour, design and longevity of materials. A minimal palette of materials are presented with the elevations to the sports hall and swimming pool largely comprising white composite panels with dark grey brick plinth. These materials have been chosen because of their longevity and sustainability: high thermal performance, high levels of air tightness, and their suitability for a corrosive atmosphere. The design incorporates elements of dark blue panels to ground floor elevations with lighter panels above. The blue is incorporated to reflect the nearby watercourse and make clear its function as including a swimming pool. Having lighter cladding to the upper levels, with a random pattern of grey panels is intended to reduce the visual impact and to be more sympathetic to the surroundings than the current leisure centre building. Imagery is provided below to demonstrate this point. The visual impact of the buildings is further addressed below within the context of the MLF, heritage assets and the Conservation Area. It is considered that other colours would make the building more visible.
- 7.38 The design is considered to incorporate good quality landscaping within and to the edges of the site, and within the parking area too, and with good and safe connections through the site to the proposed building and the existing demountable pool building. The landscaping is detailed within the section below. The landscaping scheme presented would create an enhanced appearance to the site.
- 7.39 A Built Heritage, Townscape and Visual Impact Appraisal (BHTVIA) was submitted and is considered to provide a thorough and robust assessment of the potential impact of the proposed development on the significance of heritage assets, townscape character and visual amenity, from visual receptors at the site and its surroundings. This includes with respect to the effect on the character and appearance of the MLF and views into and across the St. Peter's Conservation Area, including from Caversham Bridge, the Thames Promenade and the Grade II listed Park and Gardens of Caversham Court Gardens.
- 7.40 It should be noted that although the study was undertaken in the Autumn, in line with best practice, the consultant appraised the visual effects, relating to when there would be the highest degree of visibility, which would normally be during the winter months when deciduous trees would be bare of leaves. The BHTVIA was based on access to publicly accessible areas, and although potential effects from properties were considered the nearest publicly accessible location was used.

- 7.41 The site itself has no Heritage Assets (HA), but those within 500m of the proposed site are assessed. An assessment of their significance² has been undertaken, and is documented in table 3.1 of the BHTVIA. All except The Church of St. Peter, are identified as having a medium level of sensitivity to development.
- 7.42 In terms of the St. Peter's Conservation Area, relevant defined key characteristics of it, as set out in the Conservation Area Appraisal (CAA), have been used to assess the impact of the proposed scheme. The CAA states that with respect to views out only the churchyard and Caversham Court have significant views out of the area, across and along the River Thames. It states *“Although the Thames-side Promenade is an attractive walk on the opposite side of the River, the buildings in this view are unattractive. The new swimming pool [referring to the demountable pool] adjacent to Rivermead Leisure Centre is visible from Caversham Court Gardens, and it will be important that sufficient tree planting takes place to screen the building as much as possible.”* The CAA concludes that elsewhere the views out of the CA are very limited.
- 7.43 The conclusion of the BHTVIA is that the proposal would have no harmful effect on the setting or significance of the HAs in the surrounding area, and the assessment has had regard to the statutory duties in Section 66³ of the Planning (Listed Buildings and Conservations Areas) Act 1990 (as amended) and is in line with Section 16 of the NPPF and the guidance in the NPPG.
- 7.44 With respect to townscape the BHTVIA identifies four main Townscape Character Area receptors, and these are shown below:



² The NPPF defines heritage significance at 'Annex 2: Glossary' as: *“The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting.”*

³ *“In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.”*

- 7.45 The townscape value has been assessed as: TCA1: River Thames Corridor - High; TCA2: Residential Caversham - medium- to high; TCA3: Light Industrial - low; and TCA4: Transport Corridor - low. In addition, the assessment includes a review of the value of views towards the site from defined sensitive receptors, such as Caversham Court Gardens, the Church of St. Peter and Caversham Road Bridge, and assesses the scheme's visual impact.
- 7.46 The proposed scheme would be visible in some views, as is the existing leisure centre. It would be seen beyond the tree planting along the river edge, such visibility would remain broadly the same as the existing centre, although the views from some of the visual receptors identified in the BHTVIA would change. Officers agree that the proposed building would not be considered harmful in the context, as the magnitude of change in the views from these visual receptors are assessed as being low.
- 7.47 The elevational detail and materials have been developed in consideration of the views to it from the surrounding properties to the north. Screening would be provided by the retained north-east mound, which would be extended in height and soft landscaped. The windows to the rear of the first floor would provide views into the leisure centre and the choice of cladding is intended to break up the northern elevation with variations in colour and angled sections. In addition, the existing raised bunds to the north and east of the site would be extended to further screen views from Rivermead Park and the Thames Path. There would be approximately 100 new trees provided as part of the overall landscape strategy. In combination, it is considered that the impact of the proposal would be limited, and indeed it is considered it would have an enhanced appearance, compared to the existing leisure centre.
- 7.48 The proposed building would be a comparable height to the existing leisure centre and would continue the character of development in the area. It would be of a higher design quality than the existing centre. It would be seen through the tree planting along the river edge against a backdrop of industrial buildings along Cardiff Road.
- 7.49 Overall the design is considered to be in accordance with Policy CC7, whilst ensuring it meets the requirements for sports provision and would achieve a high level of sustainability. It is considered that a good balance has been achieved between a functional contemporary building and a scheme which respects the wider setting within the MLF and views from the north.
- 7.50 The existing views within the BHTVIA have been supplemented by superimposed CGIs of the proposed scheme, and some images are included below. It is considered that the proposed scheme would not be overly prominent when viewed from the north and would not have a detrimental effect on the MLF, or views across it, and would not

detract from the overall character or appearance of the MLF and would therefore accord with Policies EN1, EN7, EN11 and EN13.



Figure 30: Artist's Impression of the view of the Rivermead Leisure Centre across River Thames



Figure 31: Artist's Impression of approaching the leisure centre from the Thames Path

Transport/Parking

- 7.51 The application was supported by a Transport Assessment and Travel Plan.
- 7.52 The Application Site is in a sustainable location easily accessible by foot, cycle paths and public transport. It is surrounded by a network of local on and off-road cycle routes providing a link to residential areas. The R40 route connects Emmer Green and Caversham Heights to the site and other local cycleways provide connections to other parts of Reading. NCN Route 5 adjacent to the River Thames is approximately 600m to the east of the site and provides a link to the R40.
- 7.53 There are also a number of bus routes within the vicinity which provide access to Reading town centre and surrounding residential areas. The site is also served by Readibus.
- 7.54 The proposal would retain the existing pedestrian and vehicular access from Richfield Avenue. The proposed scheme would include a car park on the site of the existing leisure centre with a total of 122 standard car parking bays, 22 blue badge bays, 14 family spaces, and the retention of the two overflow parking areas of 88 and 112 no. spaces. There would be a coach drop-off point on the western edge of the car park and a Readibus drop off point.
- 7.55 There would be 40. no designated electric vehicle charging points (EVCP).
- 7.56 There would be a total of 40 no. covered cycle storage spaces located directly outside the main entrance hub.
- 7.57 The current pedestrian access from Richfield Avenue terminates at the edge of the existing car park. The proposal would extend the pavements either side of the access road, would link to the pedestrian plaza, the leisure centre, and the surrounding park. This would create a safe route to the parkland for pedestrians and cyclists. Pathways within the site would be well lit and suitable for all abilities including level access, tactile signs and suitable surfaces.
- 7.58 The enclosed bin storage area and existing substation would be provided adjacent to the turning head to the north of the new car parking areas and deliberately sited away from the drainage culvert to minimise rodent ingress. A condition is recommended for the submission and approval of further details.
- 7.59 A secondary servicing area would be provided adjacent to the eastern frontage of the building, also with a turning head.
- 7.60 The DAS includes some information with regard to the proposed phased approach to construction, intended to allow the existing leisure centre to remain in operation throughout the build period. A

condition is recommended for the submission and approval of a Construction Method Statement, to include a phasing plan.

- 7.61 The Highway Authority has confirmed that the scheme would be acceptable in transport terms, subject to attaching a number of conditions (set out in the Recommendation above), and would therefore accord with requirements of policies TR2-TR5.

Landscaping, Ecology & Open Space

- 7.62 Policy CC7 requires developments to be assessed to ensure that they *“Are visually attractive as a result of good high quality built forms and spaces, ... and appropriate materials and landscaping.”*
- 7.63 Policy EN12 states that on all sites development should provide *“a net gain for biodiversity wherever possible.”*
- 7.64 Policy EN14: Trees, Hedges and Woodlands requires new development *“...make provision for tree retention and planting within the application site, particularly on the street frontage, ... to improve the level of tree coverage within the Borough, to maintain and enhance the character and appearance of the area in which a site is located, to provide for biodiversity and to contribute to measures to reduce carbon and adapt to climate change.”*
- 7.65 The site is within the Rivermead Park and this is within the Major Landscape Feature (MLF) (Policy EN13) and includes a small part of, but is largely adjacent to, the protected Local Green Space under EN7Wp (Rivermead and Thameside Promenade), which states that *“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.”*
- 7.66 The site is also within an Air Quality Management Area (EN15) where the provision of tree coverage is important.
- 7.67 To the west, north and north-east side of the site there is a large section of short amenity grass forming the parkland setting of Rivermead Park. Most of the site to the south of the existing centre is tarmac car park, broken up with elements of soft landscaping within and at the perimeter of the car park. There is also a tree belt running along the drainage culvert and along Richfield Avenue to the south of the site. There is a further tree belt to the east of the existing centre, screening the play area from the River Thames.
- 7.68 The site is not covered by Tree Preservation Orders and contains 50 individual trees, the majority of which are classified as Category C, with 7 no., as category U trees. The submitted Arboricultural Impact Assessment recommends the felling of 24 trees; most to achieve the proposed layout and 6 which are considered low quality trees.

- 7.69 At the pre-application stage the Natural Environment Officer identified that landscaping could serve to screen areas of the site from outside the site. The Officer also advised that although native tree planting would be preferable there have been some issues with the successful establishment of certain trees to the north of the demountable swimming pool. Therefore, the advice was that an assessment of the ground/ soil would be required to identify any issues and suitable remediation.
- 7.70 The proposal includes for a comprehensive landscaping scheme, which was amended following detailed comments raised by the Natural Environment Officer, Caversham Globe and others regarding a number of the existing and proposed trees, in particular the proposed removal of a number of younger trees, which had been planted by Tree Wardens and had been hard to establish. The landscaping proposals have been amended including reduced/ replanned bunding footprints, paths relocated to avoid removal of trees which are now being retained (and protected during demolition / construction). *(Planning officer note: Any further comments on the amended scheme from the Natural Environment Officer will be reported in an update).*
- 7.71 In summary the amended landscaping scheme includes the following:
- Improvement of the raised bunds on the northern boundary and retention of existing and proposed new trees to further screen views from Rivermead Park and the Thames pathway.
 - The north-eastern mound will be increased in height with excavated spoil and planted with native species trees of local provenance, to extend the existing tree belt to the northeast and 3x London Planes, and a juvenile Aspen, north of the sports hall and east of the substation on the Thames Promenade, will be retained.
 - Replacement tree planting at a ratio of 2:1 replacements to link the existing northern belt of trees around the substation, around the new centre and connect with the existing planting to the south along the drainage culvert (Richfield Avenue side).
 - New tree planting to the western elevation with a tree lined avenue leading to the main entrance and within the hard paving of the proposed path between the new leisure centre and the existing demountable pool.
 - Outdoor seating with planters along the main promenade west of the building.
 - Planting beds within the car park and to the front of the main building.
 - A café and play area to the x of the existing demountable pool to the north of the site would be enclosed by low level shrub to provide clear site lines around the play area.
 - A raised height bund in the location of the existing play area (to be relocated).

- Soft landscaped area between the existing external pitches and the western end of the proposed car park to include grass and seasonal bulbs.
- The existing areas of landscaping along the southern boundary water course will be pruned and rationalised.
- Trees outside the boundary of works to be retained and protected during works with hoarding: 4 no. juvenile Oaks on the Thames Prom north of the sports hall and east of the substation; 6 no. Lime trees to the north of the existing demountable; and 1 no. Field Maple north of existing play area (north of the new centre) lies outside of the development area.

7.72 The site includes a small part of the area of Local Green Space, and the proposal includes minimal loss of land to the development confined to some strips for the service road to the east of the building and a bin store to the north. The loss would be mitigated through the demolition of the existing centre and the subsequent enhanced landscaping scheme. Policy EN7 seeks to protect the unnecessary loss of areas of open space, which can be accessed by the public. It is not considered that the Local Green Space, which this policy intends on protecting, would be affected by the proposal.

7.73 To meet the requirements of Policy EN12 there should be no net loss of biodiversity and there should be a net gain wherever possible. At pre-application stage the Council's Ecology Consultant specifically identified that the redevelopment provided the opportunity to enhance the ditch which runs adjacent to Richfield Avenue, by creating a more varied channel, and the removal of litter, invasive species and dense vegetation.

7.74 The submitted Ecological Appraisal identifies that the site is not designated for its wildlife interest and does not support UK Priority Habitat and predominantly comprises areas of hard standing and amenity grassland and no habitats of ecological importance. No evidence of roosting bats was found during inspection, although there would be a re-survey prior to demolition.

7.75 The proposal includes enhancements to the site's biodiversity value and protection of existing features including shrubs and trees. The proposed landscape plan identifies that the ditch would be improved through the ongoing maintenance and treatment of Japanese Knotweed, that overgrown sloped embankments would have ongoing annual mowing, and that existing London Planes would be retained.

7.76 Key mitigation measures would include vegetation protection and management, sensitive lighting, and sensitive removal of vegetation. Key compensation measures would include bird nesting and bat roosting boxes and wildlife attracting native hedges and tree species.

7.77 Comments from the Ecology officer and further comments from the Natural Environment officer will be reported in an update.

Conditions are currently as recommended above, and subject to the receipt of further satisfactory details officers advise that the landscape strategy and biodiversity enhancements are likely to be considered acceptable. Further confirmation will be provided in an update report.

Sustainability

- 7.78 There are several sustainability policies within the local plan which are relevant to new development.
- 7.79 The overarching sustainability Policy, CC2 requires proposals for new development to be designed and have site layouts which *“use energy, water, minerals, materials and other natural resources appropriately, efficiently and with care and take account of the effects of climate change.”* In order to achieve this *“all major non-residential developmentsare required to meet the most up-to-date BREEAM ‘Excellent’ standards, where possible;...Both residential and non-residential development should include recycling greywater and rainwater harvesting where systems are energy and cost effective.”*
- 7.80 Policy CC3 requires that all developments demonstrate how they have been designed to incorporate measures to adapt to climate change.
- 7.81 CC4: Decentralised Energy is relevant to this application as it is over 1000sqm, and requires the consideration of the *“... inclusion of decentralised energy provision, within the site, unless it can be demonstrated that the scheme is not suitable, feasible or viable for this form of energy provision.”*
- 7.82 Policy CC5 requires minimisation of waste during construction and the life of the development.
- 7.83 The submitted Sustainability Statement and Energy Strategy demonstrate that the proposed scheme would, through a building fabric first design approach combined with available Low and Zero Carbon (LZC) technology, meet carbon emission reduction targets to 45% below Part L 2013 baseline, and would be able to exceed the target of BREEAM rating of ‘Excellent’.
- 7.84 The scheme would achieve this through a number of measures as follows:
- A passive design exercise has been undertaken to optimise the building design and siting to reduce demand and to make best use of natural daylight and thermal mass insulation.
 - Natural ventilation for the sports hall and main reception area.
 - Solar shading has been provided for large areas of glazing through the use of external brise soleil and high level canopies.

- Design and use of construction details, which will limit thermal bridging and reduce heat loss through the building envelope.
- Low external element u-values.
- Low air permeability.
- Low energy LED lighting with lighting controls.
- Mechanical ventilation with passive heat recovery .
- Moveable floor pool cover to reduce the unregulated energy use.
- Water conservation measures.
- Air Source Heat Pump ASHP space heating to Gym, Studios, Offices, Café, and associated areas.
- High efficiency Air to Water CO2 Air Source Heat Pump ASHP hot water services.
- Solar Photovoltaic panels generating on site zero carbon electricity.
- Space available for plat heat exchangers in the plant room should a hot water services be provided by a district heating or energy scheme in the future.

7.85 The inclusion of 40 electric vehicle charging bays would also contribute to reducing carbon emissions.

7.86 A number of renewable measures were explored within the Energy Strategy and with respect to decentralised energy schemes the leisure centre is not one of the most suitable areas as identified in the Council’s commissioned studies. Therefore, the leisure centre would not be able to connect to a district energy centre. The Strategy also recommends that on site LZC is the best method of reducing carbon emissions from the leisure centre.

7.87 Consideration was given to the use of a green or blue roof⁴ and the applicant has advised that the structural spans that would be required clear of columns for the pool hall and sports hall would mean that this measure would be prohibitively costly due to the weight of such measures. The use of green roof/walls is one possible measure, and the proposed scheme already exceeds the BREEAM rating of ‘Excellent’ through a combination of other measures, which meets RBC’s sustainability targets and relevant policies.

7.88 Subject to conditions requiring the submission and approval of BREEAM certificate and details of PV panels, it is considered that the scheme would accord with Policies CC2, CC3, CC4 and CC5.

Environmental matters

7. 89 ***Air Quality:*** Policy EN15 requires developments to “*have regard to the need to improve air quality and reduce the effects of poor air quality*”. The Environmental Health Officer has confirmed that the submitted Air Quality Assessment demonstrates that the impacts of the operational scheme on air quality would not be significant. As

⁴ A blue roof is a [roof](#) designed for the [retention](#) of rainwater above the [waterproofing element](#) of the [roof](#)

there is a risk of dust emission during construction, a condition is included requiring a Construction Method Statement to include dust control measures.

- 7.90 **Noise:** Policy EN17 relates to noise generating equipment and that where such is proposed “.. *the noise source specific level (plant noise level) should be at least 10dBA below the existing background level as measured at the nearest noise sensitive receptor.*” The proposal includes locating plant away from facing directly onto residential properties. The submitted noise assessment demonstrates that the plant noise would not cause adverse impacts on the nearest sensitive receptors and the traffic associated with the site’s use would not create a change to noise levels. The Environmental Health Officer has reviewed the submitted noise assessment and has no objection to the proposed plant subject to a condition restricting the noise levels.
- 7.91 **Contaminated land:** Policy EN16: Pollution and Water Resources states that “*Development will only be permitted on land affected by contamination where it is demonstrated that the contamination and land gas can be satisfactorily managed or remediated so that it is suitable for the proposed end use and will not impact on the groundwater environment, human health, buildings and the wider environment, during demolition and construction phases as well as during the future use of the site.*”
- 7.92 The site is contaminated land as it is a former landfill site. Of concern is that the site is also over a principal aquifer. The submission included a Contamination Statement which shows that the site is a Characteristic Gas Situation (CS) level 3, and outlines appropriate gas protection measures, potential reduction in the source of groundwater contamination and the testing and re-use of excavated material.
- 7.93 The Environmental Health Officer has confirmed that the submitted remediation scheme is acceptable and conditions are included for the implementation of the land gas remediation scheme and the submission and approval of a verification scheme. As there are parts of the site which have not been tested because they are covered with buildings it has been agreed that a condition be included requiring further sampling of the soil once the buildings are demolished and if required further remediation measures set out. The EA considered the scheme acceptable subject to a number of conditions related to land gas contamination and the requirement for no drainage systems for the infiltration of surface water to the ground and no piling. All these conditions are included in the recommended conditions above.
- 7.94 **Drainage & Flood Risk:** Policy EN18 requires all major developments to incorporate Sustainable Urban Drainage Systems (SUDS) with runoff rates aiming to reflect greenfield conditions or be no worse than existing.

- 7.95 A Sustainable Drainage Strategy and Proposed Drainage Layout have been submitted. The surface water discharge would be to the existing minor watercourse running along the south of the site via an outfall just south of the existing building with a reduced flow rate via a flow control device. A betterment of 50% on the existing site drainage would be achieved through the use of attenuation tanks. These would be sized to attenuate a 1 in 100 year storm event with a 40% allowance for climate change. Following confirmation from the applicant that the development would provide betterment in a 1 in 1 year storm event when compared against the existing discharge rates, the SUDS officer confirmed the scheme was acceptable subject to conditions as included above.
- 7.96 Policy EN18: Flooding and Sustainable Drainage requires development to be directed to areas as the lowest risk of flooding in the first instance, following the Sequential and Exception Test set out in the NPPF. The sequential test⁵ for the site has already been undertaken as part of the background for developing the new local plan and the allocation of the site.
- 7.97 The site is within Flood Zone 2 and 3A and the submitted Flood Risk Assessment identifies the site as a have a low risk susceptibility to fluvial flooding and the proposed use is classified as 'less vulnerable'. The proposed location of the building would be within the lowest risk part of the site. The EA initially objected, because the original Flood Risk Assessment did not have the most up-to-date flood level information at the time of submission. A revised FRA was subsequently submitted with the updated information, and the EA removed their objection.

Infrastructure requirements

- 7.98 In accordance with Policy CC9, the following would be sought:
- Employment, Skills and Training - construction
- 7.99 The applicant has agreed to work with Reading UK CIC to develop an Employment Skills Plan and a condition requiring this is recommended.

Other matters raised during consultation

No 50m Pool

- 7.100 Some objectors have raised concern over the proposal not including a 50m pool. This is not material to the planning balance, but for clarity this was thoroughly considered in developing the proposals. RBC Leisure has provided the following information:

⁵ http://www.reading.gov.uk/media/8646/EV028-Sequential-and-Exception-Test-Local-Plan-2018/pdf/EV028_Sequential_and_Exception_Test_Local_Plan_2018.pdf

- 7.101 The Sport England's modelling results indicated that there was no clear strategic need for provision of this scale on a single site. The provision of a 50m pool was not supported by Swim England (formerly Amateur Swimming Association - ASA) as the most appropriate facility type for Reading.
- 7.102 50m pools are rare due to the cost of building, maintaining and operating them and it would not have been possible to provide a 50m pool and diving facilities. The overall aim was to provide a wide range of facilities to meet a broad range of activities and a 25m pool would still meet FINA (International Swimming Federation) requirements and it would be able to be used as a short course competition pool.
- 7.103 Consultation with Sport England and Swim England supported 25m pool options as the most appropriate scale of facility to meet the strategic needs of swimmers and clubs in Reading.

Equalities Impact

- 7.104 In determining this application the Council is required to have regard to its obligations under the Equality Act 2010. Matters have been raised through the consultation with regard to a number of access matters, as documented in the Consultation section above. The proposed scheme would be DDA compliant. The scheme was presented to the Reading's Access and Disabilities Working Group on 5th March 2020.
- 7.105 The proposed scheme includes a wide range of accessibility measures (listed in Appendix 2).
- 7.106 Following consultation with the Access Officer during the course of the application, as detailed in the Consultation section above, and in direct response, the applicant mainly provided further clarification within the Consultation Response Statement (dated 24th February 2021 rec 12th March 2021). One change was made, however, to the original grasscrete in front of the southern elevation glazing, so that this would now be a planted, landscaped area.
- 7.107 A further presentation was made to RBC's Access and Disabilities Working Group on 4th March 2021, to explain the accessibility strategy further. The applicant has confirmed that a working group is being set up between members of this working group, GLL, RBC and SBA who would review plans going forward into the next design stage.
- 7.108 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.

CONCLUSION

- 8.1 This proposal has been carefully considered in the context of the Reading Borough Local Plan 2019. The proposal would provide an enhanced replacement leisure centre on an allocated site, making effective use of a previously developed site.
- 8.2 The design has been carefully considered and developed, so that it responds positively to the site in terms of being positioned closer to Richfield Avenue, placing the smaller mass of the sports hall closest to the MLF, enhancing its prominence within the street and providing a welcoming and clear entrance. It incorporates a comprehensive landscaped scheme, with biodiversity enhancements, which have been amended during the course of the application to respond positively to consultation and neighbour comments, and includes enhancement of screening. It is considered to not cause significant harm to the character and appearance of the wider Major Landscape Feature, or detrimentally affect the views from the north and specifically from the St. Peter's Conservation Area and specific heritage assets within it, and would be an enhancement compared to the existing Leisure centre.
- 8.3 The design would be a smaller footprint, of good quality, with better designed facilities than the existing centre, in a flexible space to be able to respond to future leisure provision, such as differing uses within the double height activity area. It has been developed in consultation with a range of national and local sports groups and other stakeholders. It would be a sustainable building which would exceed the BREEAM 'Excellent' rating and would therefore, meet the Council's sustainability policies.
- 8.4 The centre would provide enhanced leisure facilities that would meet national and local objectives and policies regarding access and participation in sport and leisure and promoting health and wellbeing.
- 8.5 Officers have worked positively and proactively with the applicant on this scheme, and amendments have been secured, which are considered to satisfactorily address policy issues and overall officers consider this to be a supportable scheme, which accords with relevant national and local policy. The planning application is therefore recommended for approval subject to conditions as detailed above.

Case Officer: Alison Amoah

APPENDIX 1: EIA Schedule 3 Criteria

CHARACTERISTICS OF DEVELOPMENT

1. The characteristics of development must be considered with particular regard to—

- (a) The size and design of the whole development;
- (b) Cumulation with other existing development and/or approved development;
- (c) The use of natural resources, in particular land, soil, water and biodiversity;
- (d) The production of waste;
- (e) Pollution and nuisances;

LOCATION OF DEVELOPMENT

2.—(1) The environmental sensitivity of geographical areas likely to be affected by development must be considered, with particular regard, to—

- (a) The existing and approved land use;
- (b) The relative abundance, availability, quality and regenerative capacity of natural resources (including soil, land, water and biodiversity) in the area and its underground;
- (c) The absorption capacity of the natural environment, paying particular attention to the following areas—
 - (i) Wetlands, riparian areas, river mouths;
 - (ii) Coastal zones and the marine environment;
 - (iii) Mountain and forest areas;
 - (iv) Nature reserves and parks;
 - (v) European sites and other areas classified or protected under national legislation;
 - (vi) Areas in which there has already been a failure to meet the environmental quality standards, laid down in Union legislation and relevant to the project, or in which it is considered that there is such a failure;
 - (vii) Densely populated areas;
 - (viii) Landscapes and sites of historical, cultural or archaeological significance.

TYPES AND CHARACTERISTICS OF THE POTENTIAL IMPACT

3. The likely significant effects of the development on the environment must be considered in relation to criteria set out in paragraphs 1 and 2 above, with regard to the impact of the development on the factors specified in Regulation 4(2), taking into account—

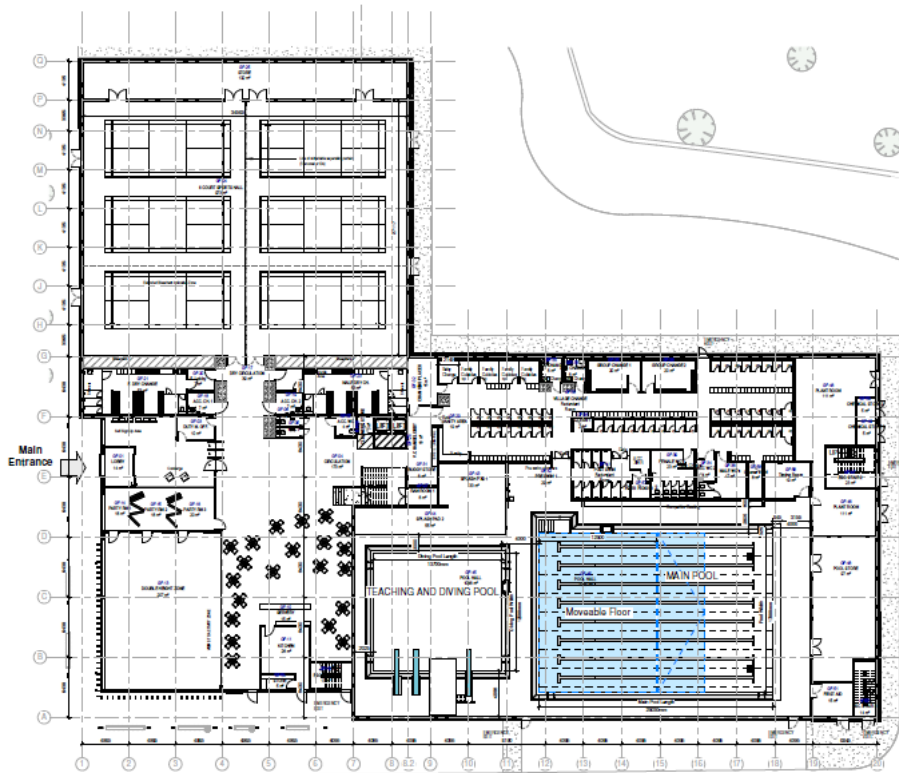
- (a) The magnitude and spatial extent of the impact (for example geographical area and size of the population likely to be affected);
- (b) The nature of the impact;
- (c) The transboundary nature of the impact;
- (d) The intensity and complexity of the impact;
- (e) The probability of the impact;
- (f) The expected onset, duration, frequency and reversibility of the impact;
- (g) The cumulation of the impact with the impact of other existing and/or approved development;
- (h) The possibility of effectively reducing the impact.

APPENDIX 2: Accessibility Measures

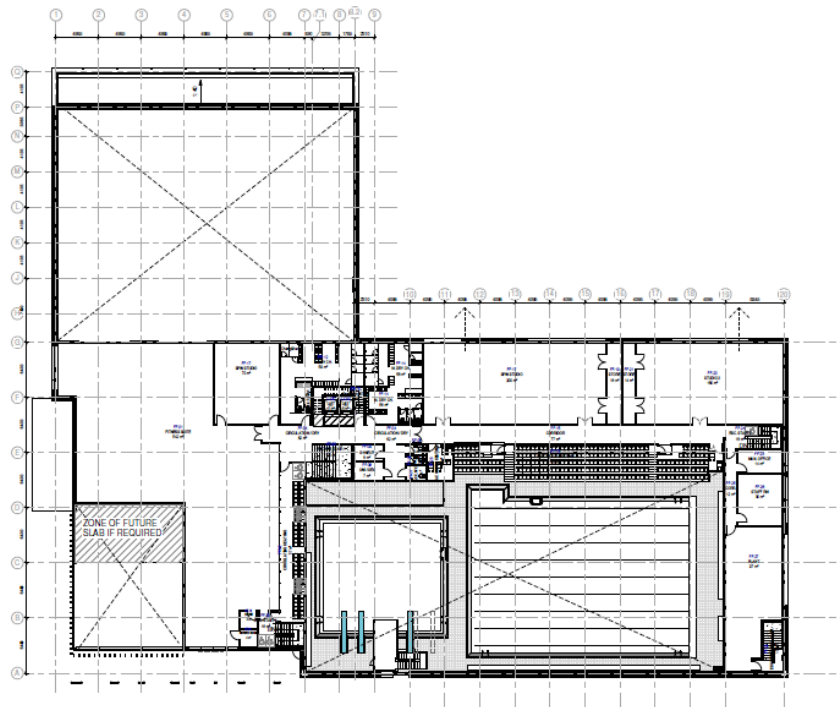
- Well-lit level footpaths, with suitable surfaces, through to the main entrance, with dropped kerbs and blister paving where required. Resting benches will be provided no more than 50m apart along these routes to the entrance;
- 22 no. accessible parking spaces;
- Drop off points and dropped kerbs outside the main entrance;
- Level access into the building through the main reception;
- Level access from fire escape routes around the building;
- Visual contrast of colour of cladding to make the entrance clear;
- Automatic doors within the lobby area;
- Circulation widths suitable for wheelchair users, with sports wheelchairs at ground floor;
- Induction hearing loops and dropped counter sections;
- Accessible toilets;
- Accessible Changing facilities (in accordance with Sport England's Guidance) including a Changing Places room;
- Unisex and gender neutral changing cubicles;
- Lifts;
- Wheelchair storage;
- Shallow accessible steps into the pool with handrails;
- Wet side wheelchair lifts;
- Stairs to be accessible for ambulant disabled with wheelchair refuges;
- Brail signage;
- Detailed review of Swim England's Dementia Friendly design guidance to ensure the centre would be Dementia friendly.
- Coloured paving and tarmac to be decided at the next detailed design stage;
- Pedestrian Plaza would be wide enough to allow adequate circulation between users and detailed design to ensure 'clutter free' zones;
- Knee rails would be kept to a minimum;
- Tree pits with suitable grating and future maintenance;
- Lighting strategy for suitable site wide lighting. To be detailed further at next design stage;
- Manifestation on glass doors and windows would be provided in line with Building Regulations;
- Entrance barrier matting would be suitable for wheelchair users and of an appropriate colour for those with Dementia.

APPENDIX 3: Plans

Plans



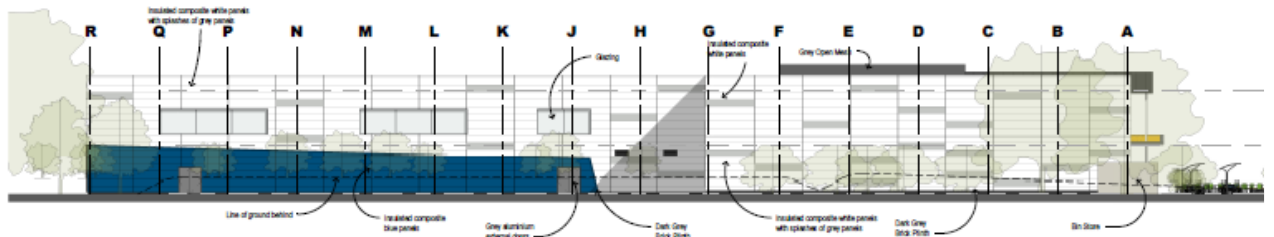
1 Ground Floor Plan
1:200



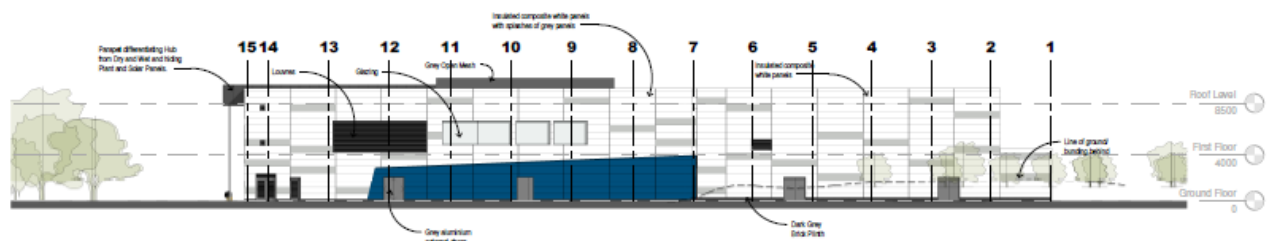
1 Proposed First Floor Plan
1:200



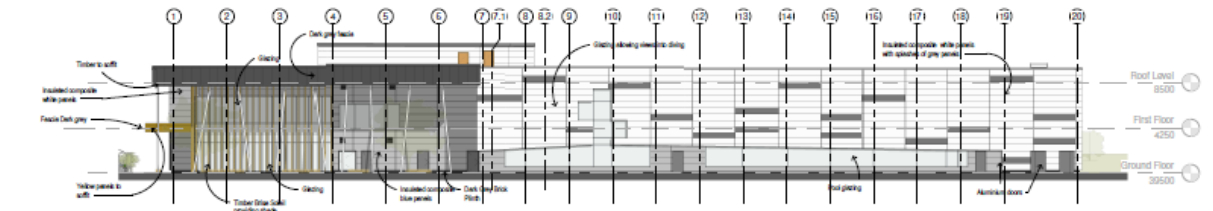
Elevations



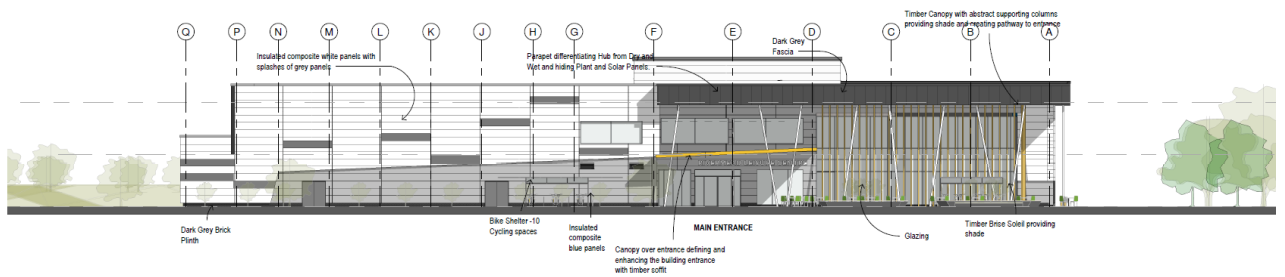
Proposed North Elevation
1:200



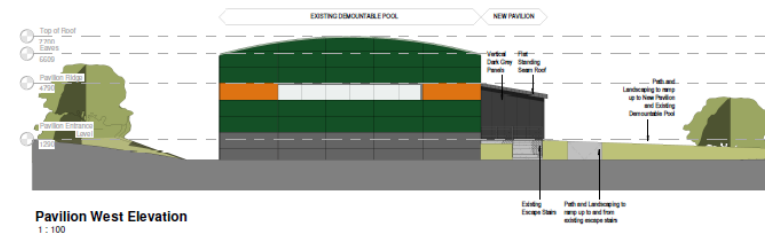
Proposed East Elevation
1:200



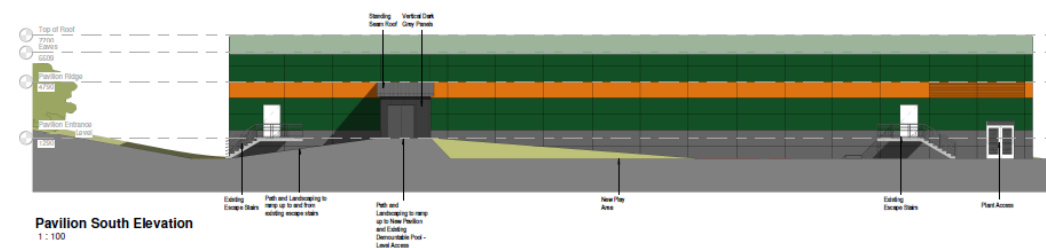
Proposed South Elevation
1 : 200



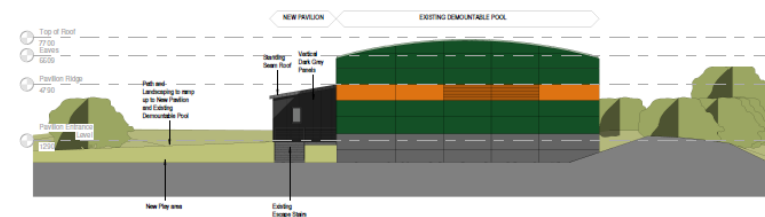
Proposed West Elevation
1 : 200



Pavilion West Elevation
1 : 100



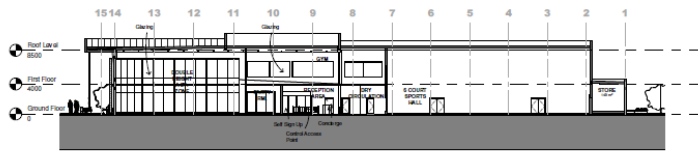
Pavilion South Elevation
1 : 100



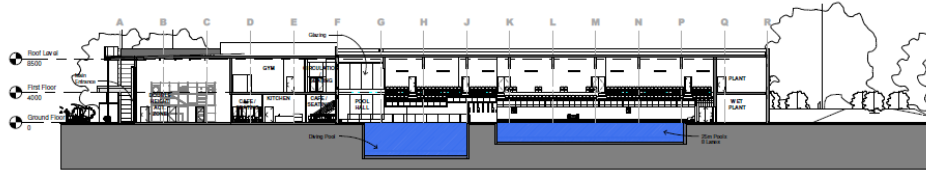
Pavilion East Elevation
1 : 100



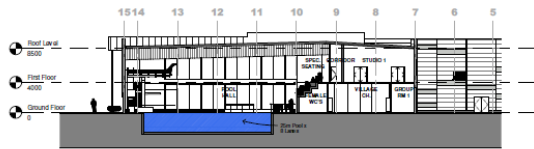
Sections



Proposed Section A
1 : 200



Proposed Section B
1 : 200



Proposed Section C
1 : 200



Tree Plan (review to be provided in the update report)

Proposed Site Plan

