



**Arthur Hill – Save Our Swimming CIC**  
**35 – 39 London Street**  
**Reading**  
**RG1 4PS**

Planning Policy Team  
Reading Borough Council  
Civic Offices  
Bridge Street  
Reading  
RG1 2LU

By email to [planningpolicy@reading.gov.uk](mailto:planningpolicy@reading.gov.uk)

14 January 2018

Dear Madam / Sir,

**PALMER PARK DEVELOPMENT FRAMEWORK**  
**PUBLIC CONSULTATION**  
**FEEDBACK FROM ARTHUR HILL – SAVE OUR SWIMMING**  
**COMMUNITY INTEREST COMPANY**

Arthur Hill – Save Our Swimming Community Interest company would like to make the following comments in response to Reading Borough Council's consultation on the Palmer Park Development Framework. In summary:

- Refurbishing and reopening Arthur Hill Swimming Pool would be a more cost effective and lower impact option than building a new pool.
- Reading Borough Council should undertake a proper site options appraisal before selecting a location for development of any new swimming pool in East Reading.
- Proposals to expand the car parking capacity in the Park would run counter to policies on preserving public open space (EN7) and promoting sustainable transport (TR1) in the Reading Local Plan.
- Any future leisure development in Palmer Park should not result in any loss of open parkland and should not give rise to a net increase in car parking space in the park.
- Construction of a new leisure facility should not open the door to future leisure development in the park.
- The adventure play area in the park should be refurbished and re-opened.





**Arthur Hill – Save Our Swimming CIC**  
**35 – 39 London Street**  
**Reading**  
**RG1 4PS**

### **Proposed new swimming pool**

1. Although the Palmer Park Development Framework includes proposals for improving the park environment, the bulk of its content presents a case for building a new swimming pool in the park. Our view is that, rather than building a new pool, Reading Borough Council should refurbish and reopen Arthur Hill Pool on the grounds that this would be a more cost-effective option with lesser impact. Refurbishing Arthur Hill Pool would, in our estimation, cost only 25 - 40% of the cost of building a new pool. Funding saved by taking this option could be used towards a new 50 metre swimming pool which Reading's swimming community is calling for.
2. Palmer Park is not the only potential location in East Reading for a new swimming pool, nor necessarily the best location for a new pool. Before deciding to build a new pool Reading Borough Council should undertake a proper options appraisal of all potential sites in East Reading, including newly released sites with development potential and sites owned by potential partners (for example, educational establishments). The assessment should also consider other options for meeting demand for swimming in East Reading, including refurbishing and reopening Arthur Hill Pool, and the potential for co-operating with Wokingham Borough Council to enable their existing and new pools to be made available on advantageous terms to Reading Borough residents.
3. It should not be assumed that a new swimming pool will be built in Palmer Park. Policy EN7 in the submission draft Reading Local Plan states that local green spaces and public open space will be protected from development. Proposals that would result in the loss of any of these areas of open space, erode their quality through insensitive adjacent development or jeopardise their use or enjoyment by the public, will not be permitted. Policy En7Ed indicates that this includes Palmer Park. There is therefore a conflict between the Council's proposals to build a swimming pool in Palmer Park (policy ER1j) and policy EN7.
4. Policy EN7 is supported by the National Planning Policy Framework, which states that existing public open space should not be built on unless the loss is replaced by equivalent or better provision (paragraphs 73 and 74).
5. The draft local plan has not yet been approved by the Secretary of State and that at the Enquiry in Public stage an objection was made to development in Palmer Park by Arthur Hill Save Our Swimming CIC on the grounds of the conflict between policies ER1j and EN7. Even if the Secretary of State approves the plan as submitted by the Council, Palmer Park is not the only potential site for development of a new pool, and planning permission for the building has not been obtained.
6. We also observe that there are a number of other swimming pools within easy travelling distance of Palmer Park – Wokingham Borough Council's new pool at Bulmershe Leisure Centre and the existing pool at Loddon Valley, and the private David Lloyd pool at Thames Valley Park. Reading Borough Council should demonstrate that there is sufficient demand to justify construction of a new pool before embarking on what would be an expensive project which would result in an irreversible



**Arthur Hill – Save Our Swimming CIC**  
**35 – 39 London Street**  
**Reading**  
**RG1 4PS**

loss of parkland. Again, re-opening Arthur Hill Pool would act as a 'halfway house' low cost option which would increase waterspace without the impacts resulting from new build.

### **Loss of public open space**

7. If an options appraisal indicates that a new swimming pool in Palmer Park is viable and the best option, then development of the pool should only proceed under certain conditions:
  - There should be no net loss of open park space.
  - There should be no net increase in the car parking area within the park.
  - Further development in the park, whether for leisure or other purposes, should not be permitted.
8. The two locations identified in the Palmer Park Development Framework are not the only potential sites where a new swimming pool could be built in the park. No justification is given for why these locations have been selected but others rejected. It is conceivable that other locations or orientations for the proposed pool could have lower impacts than the two outlined in the Development Framework. Construction of a new pool in Palmer Park should not commence until a proper appraisal of alternative sites within the park has been undertaken.
9. We are particularly concerned that the proposals in the Development Framework would see a considerable increase in car parking space in Palmer Park, and a corresponding loss in open parkland. Although the figures presented in the Development Framework are somewhat ambiguous, Reading Borough Council's Lead Councillor for Strategic Environment, Planning, and Transport has stated that the proposed development would result in an increase in parking spaces from 217 to up to 280 spaces, plus an 'overflow car park' of around 150 spaces. Grassing, tree planting, and surfacing of car parking areas will not compensate for this loss of open space.
10. The proposal to expand car parking space in Palmer Park is not compliant with policy in the submission draft Reading Local Plan. Policy TR1 requires major development proposals to provide a commitment to implement measures to promote and improve sustainable transport facilities and contribute to meeting the objectives of the Local Transport Plan. An expansion of car parking space associated with development of the swimming pool would clearly run contrary to this policy. The proposal also contradicts the recommendations of the Annual Report from the Strategic Director of Public Health, 'Creating the Right Environment for Health', which states that opportunities to increase active transport should be considered when designing new green spaces and in the improvement of existing space.
11. Our view is that this parking area will attract residential and business parking, as well as park users. There should be no need for substantial additional parking space as Palmer Park is on a number of frequent bus routes. There are two bus stops beside the park, both in close proximity to paths leading directly to the existing leisure centre.



**Arthur Hill – Save Our Swimming CIC**  
**35 – 39 London Street**  
**Reading**  
**RG1 4PS**

12. We are concerned that the new pool is described in the Development Framework as a desirable destination'. Local councillors have likewise expressed aspirations that the new pool will be a 'travel-to destination' from a wider area. Arthur Hill Pool, which the new pool has been billed as replacing, was a local swimming pool catering largely for residents within walking distance of it, and the new pool should likewise cater predominantly for local people. If Reading Borough Council intends to build a swimming pool which will be a 'desirable destination', this should be the replacement pool for Central Pool, currently planned for construction at Rivermead.
13. Page 16 of the Development Framework states that there will be “potential to add new layers of use and function into the core area of the park”. Given that some local councillors have advocated developing Palmer Park as a 'leisure hub', and have mentioned, for examples, future plans to develop a climbing wall in Palmer Park, we view this statement with some alarm as the thin end of the wedge for further development and loss of open space in Palmer Park. We are worried that the leisure centre will be seen by the Council and the contractor which the Council intends will take over Reading's leisure facilities as an opportunity area for development and moneymaking. Already the proposed development includes plans for a new cafe: an unnecessary proposal given that there is already a cafe in the park, and one which has clearly only been included in the interest of increasing income for the leisure centre operators.
14. The development proposals for the heart of the park appear to be principally in the money-making interests of a future leisure centre operator, rather than park users and local residents. Under these proposals public open space in Palmer Park, open to everyone to use free of charge, will be lost to a leisure facility and car park which will only be accessible to those able to pay to use them.

#### **Proposals for increasing general use of the park.**

15. Although the proposals to 'reinstate the heart of the park' relate largely to building a new swimming pool, we support other measures presented in the Development Framework which aim to increase the park's informal use, improve footfall in the park and improve entrances and paths. We broadly support the initiatives aimed at retaining the character of the northern part of Palmer Park, strengthening the active core of the park, and those relating to paths and historic links. These improvements would be viable as a stand-alone package without construction of a new swimming pool. Under no circumstances should a new pool be built without the proposed broader improvements to the park also taking place.
16. We agree that the future plan for Palmer Park should aim to consolidate the park's uses, but we would like to warn that previous development in park, and the opening of vehicular access to these developments, has led to the 'collection of uses' and 'lack of structure or heart to the park' which are perceived as issues. Further development in the park is unlikely to be able to address these issues successfully.
17. We would like to emphasise the importance of Palmer Park for informal recreation by the local community. In particular, the Development Framework claims that the area allocated for an



**Arthur Hill – Save Our Swimming CIC**  
**35 – 39 London Street**  
**Reading**  
**RG1 4PS**

expansion of the car park is an 'underused' part of the park. This is emphatically not the case, as the area is in daily use by families and children playing games and other activities. We are disappointed that the Council does not consider an Equalities Impact Assessment necessary for the proposed development, given the various ethnic minority communities which are present in East Reading, and the large proportion of ethnic minority residents in the area immediately surrounding the park, many of whom use the park heavily.

18. We are also disappointed that the ERAPA adventure play area is marked in the Development Framework as 'play equipment marked for removal', as there has been no discussion of this with the local community or park users. The adventure play area should be refurbished and re-opened. If a new consolidated play area is opened in the park, it must include an adventure play area of a similar scale to the current ERAPA facility.
19. The Palmer Park Development Framework does not include proposals to improve lighting around the park's main paths, or to tackle the occasional flooding of paths which makes them impassable. These issues could be easily resolved, and the necessary improvement measures should be included in the Development Framework.
20. The Development Framework should place more focus on integrating the library into the park as a whole, and linking it more closely with facilities in the central area, rather than treating it in isolation from other features of Palmer Park.

### **Closing comments**

21. We must finally place on record our view that Reading Borough Council is not conducting consultation on the Palmer Park Development Framework in good faith, as we believe that local councillors and senior officers have already made up their minds on the future of Palmer Park and will not change their views if this consultation demonstrates that the public hold different views to theirs. The Council has demonstrated a number of breaches of trust in relation to a proposed new swimming pool in East Reading, and other local issues, which make it difficult for us to take this consultation at face value. Notably:
  - Reading Borough Council first pledged to build a new pool in East Reading in 2003, yet more than fifteen years later work on the new pool has not yet commenced.
  - In 2005 the Council undertook a previous consultation on Palmer Park (including construction of a new pool), the results of which have never been actioned.
  - The Council promised not to close Arthur Hill Pool until a new pool had been built, yet this promise was broken when Arthur Hill Pool closed in 2016.
  - The Council stated that Arthur Hill Pool had been closed for financial reasons, yet barely six months after the pool has been closed the site was allocated for housing development in the draft Local Plan.
  - A large majority of local residents opposed construction of the East Reading Mass Rapid Transit scheme, yet their views were ignored and the Council proceeded with the scheme contrary to



**Arthur Hill – Save Our Swimming CIC**  
**35 – 39 London Street**  
**Reading**  
**RG1 4PS**

the wishes of local people. We have no reason to believe that the situation will be any different with Palmer Park.

22. In order to help generate confidence that the Council has considered all the issues which we, and other consultees have raised in this consultation, we request that the Council publishes a detailed response to the consultation, in accordance with best practice, providing point-by-point responses to every individual point raised by consultees.

Palmer Park was gifted to the public for their recreational use, not for the Council to develop on at its whim. However, it has been selected as a location for a new swimming pool purely out of convenience to the Council. There is a clear conflict of interest in this case between Reading Borough Council's roles as a planning authority, a landowner, a leisure provider, and a developer. That the Council has not resolved this conflict of interest is evident in that the Palmer Park Development Framework actively advocates for a new pool in the park rather than taking a neutral, more objective approach.

Yours sincerely,

Peter Burt  
Company Secretary