



The Wokingham Society

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Website; www.wokinghamsociety.org.uk

Peter Must
Chairman
8 Albert Road
Wokingham
Berkshire
RG40 2AL
Tel: 0118 9781671

email: chairman@wokinghamsociety.org.uk

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Dear Sirs

CARNIVAL LEISURE HUB APPLICATION NO: O/2015/1056

I am writing on behalf of the Executive Committee of the Wokingham Society to offer our response to the hybrid application for the development of the Carnival Leisure Hub. May we say at the outset that we support the concept of developing this site and our comments address specific concerns about particular proposals within the application?

1. Car park/bowling alley

In our response to the consultation in March 2014 on developing the Carnival Pool site we wrote: “Without a Wokingham Town Centre Car Parks Capacity Statement in place it is difficult to comment on the appropriateness or otherwise of providing 500 parking spaces (rather than a different number) in this location, no explanation being offered in the consultation material. We would like to come back to this question when the strategy is available and we therefore hope that the Council will be ready and willing to consider any additional submissions specifically related to the size and use of the multi-storey car park at that stage”.

At the consultation stage we were told that the car park at this location was meant to be a ‘gateway’ car park, intended to provide both long-stay space for those wishing to access other parts of the town from that location, including the station, and short-stay bays primarily for those using the facilities on site.

At its meeting on 26 March 2015, the Borough Council Executive was told that, in place of A Wokingham Town Centre Car Parks Capacity Statement:

“The specifics of car parking numbers required across the town will be dealt with in the planning application for Elms Field.

In addition a wider strategy for travel to and around the town is being written and this will incorporate aspirations for car parking. This vision document will be brought to Members in due course”.

(a) Amount of parking space and building height

Paragraph 85 of the Transport Assessment states that:

“The Highways Authority [ie the Council’s Highway Department rather than the Highways Agency] has recently undertaken a review to identify future parking demand based on a regenerated town centre, and supply taking into account the forecast loss of spaces due to the redevelopment of existing car parks”.

The details of this review have not been made available to the public, although we see that they are included in a paper entitled ‘*Travelling to Wokingham Town Centre – Our Vision for the Future*’, to be considered by the Council Executive on 25 June 2015. It is most unfortunate that this paper was not available for consultation during the response period for this application so that readers could see the basis of the claims of parking spaces needed by 2026.

In the application itself we are merely given the claimed conclusion that “in the order of 260-375 parking spaces is required at Carnival Pool in addition to the replacement of the existing provision [ie the current 220 spaces which will be lost from the site].” This conclusion is arrived at by assuming a need for spare capacity of between 15% and 20% on top of the estimated supply of/demand for town centre car parking spaces in 2026, calculated at 1521/1560 spaces. What is not explained, until one reads the Vision paper, is that this spare capacity derives from an assumed average 80-85% occupancy rate of all town centre car parks.

This surplus is, of course, quite expensive unused space, especially when provided within a multi-storey car park, and one is bound to ask whether such extra provision is absolutely vital. We are highly sceptical that it is needed in this particular location, at such a cost per space.

In particular, we note that the 178-bay multi-storey car park at Elms Field, not included in the capacity survey because it is privately run, is distinctly underutilised and, if refurbished to make it more attractive to users, would very easily meet the spare capacity figures at a fraction of the cost of a new build. We therefore propose that this opportunity be explored rather than approving the cost of such a large car park on Elms Field.

In addition, both the Town Centre Masterplan and the Vision statement refer to the provision of long-stay car parking at Coppid Beech and elsewhere (see next section) in order to reduce the amount of long-stay parking in the town. If provided, these spaces will mean that less are needed in and around the town centre and we would argue that this provision should be factored in since it will then show that less off-street parking is needed in Wokingham town centre than the application proposes.

In summary, we accept the case for a car park on this site, but we are not persuaded nor, we suggest, should the Planning Department or the Planning Committee be, of the need for it to be as large as intended. The consequence of the unquantified assumptions about size is that this building will tower over the south side of the town, being clearly visible from Elms Field, the Pavilions, and properties to the north of Wellington Road. **We urge that the use of the Elms Field multi-storey car park be optimised, and the likely number of gateway long-term parking spaces should be factored in so that the height of the building at Carnival Pool can be reduced by one floor, with the additional benefit that it will not dominate the skyline.**

If the choice is solely whether to approve or reject the proposal, we strongly recommend that it be rejected on the grounds that the case for a building of this size has not been made.

(b) Use of the multi-storey car park

The terms ‘gateway’ and ‘long-, medium- and short-stay’ are used imprecisely in the documentation. The area at the edge of Elms Field and Carnival Pool is referred to as a ‘gateway’. When talking about car parks, the Transport Assessment, quoting the Town Centre Masterplan, says: ‘at least 600 additional spaces will be available for long-stay car parking at strategic

gateways to the town centre', these being at the Station, Tesco and Coppid Beech (ie not Carnival Pool). According to the Masterplan, Carnival Pool should be used for medium-stay parking.

On enquiry to the Council we have been told that the car parks team uses the following definitions:

- Short-stay car parks are those that allow stays of up to 3 hours
- Long-stay car parks are those which permit parking over this length of stay and which offer season tickets to its users.
- However, because of the pricing structure of both the short- and long stay car parks within the town, there will be an element of short-stay use within long-stay car parks due to the proximity of these car parks to visitor destinations. Therefore, long stay car parks in Wokingham town centre are referred to as "Mixed Use" car parks.

And 'It is proposed that the multi-storey car park at Carnival Pool will be a Mixed Use car park'.

There is clearly a disconnect between the Council's current terminology and that used in the application, to the extent that it is impossible to determine exactly what lengths of stay are intended for the Carnival Pool car park. It is essential that this be clarified, and that indeed genuine long-term stays are permitted at this location, so that the car park can be used by commuters, and by overnight guests at the proposed hotel on Elms Field.

If this issue cannot be resolved by the time the application comes before the Planning Committee, we urge that it be sent back for the necessary clarifications to be provided, with provision for overnight parking.

(c) Design

Although some of us find the proposed design stark and unattractive, we recognise that this in part reflects the responses at the consultation phase and we have concluded that we would not wish to challenge the intended appearance of the car park/bowling alley. **We would reiterate, however, that it would be far better if it were a floor lower for the sake of its appearance on the south Wokingham landscape.**

2. Residential

In our response to the consultation we asked why housing had been proposed for the site when it had not been included in the Managing Development Delivery Local Plan. The answers were that it would add vibrancy, surveillance and an income stream. None of these were thought necessary in the Town Centre Masterplan and we are left with the conclusion that it is really the last of these motives which is the driving force. Apartments make poor bedfellows for a sports and leisure complex and, in design terms, they look entirely out of keeping with the rest of the buildings. **We urge that this element be removed, or at least reduced to the absolute minimum thought appropriate for a surveillance benefit.**

3. Pool and Leisure Extension

The earlier consultation prior to this application gave no indication that part of the Leisure Extension might be used for commercial and residential premises, which would entail that element being equivalent in height to the proposed car park. The 46 residential units would be over double in number to the 21 apartments referred to in Section 2 above.

We consider the provision of a significant retail element to be antithetical to the sports and leisure purposes of this site; it is extremely doubtful that this could be limited to sports/leisure outlets, or sustained should relevant retailers leave.

The case for yet further residential supply was not made in the Managing Development Delivery Local Plan, as noted in the section above. Our view is that, if at all, one should have *either* the separate residential blocks *or* a number of apartments above the leisure facilities. The need for surveillance cannot

possibly justify 67 apartments, nor does a leisure site like this need that scale of housing, especially since it is argued that ‘unique’ considerations entail no provision for affordable accommodation.

It is also stated that this element would be as tall as the multi-storey car park, thus presenting another disfigurement of the skyline.

For all the above reasons, we call for the commercial and residential block to be abandoned on the grounds of inappropriateness, over-supply and height.

In its Statement of Community Involvement, the applicant agrees that thought will continue to be needed as to the design of this part of the complex. **We would reiterate our hope that the local community will be given the opportunity to comment on proposed designs before a detailed planning application is submitted.**

4. Landscaping

We note that the route of the existing footpath to the railway line is to be retained, although shared with access to residents’ parking spaces, and that the green buffer between it and the Pavilions is to be maintained. **The opportunity should be taken to tidy and shape that buffer so that it forms a pleasant hedgerow rather than an unkempt and neglected place for weeds and thorns.**

Otherwise, we wish to repeat our previous response in respect of this, and other areas of green open space, and **are glad to note from the Statement of Community Involvement that it is intended to involve interested residents (including Incredible Edible) in planning these areas:**

“Much effort has been devoted to landscaping the first part of that path, especially for Wokingham in Bloom, and there are plantings and insect habitats that have been created in the last couple of years. It is understood that local residents regard the path as a hazard to personal safety and we would not wish retain it against their concerns. We would ask, however, that an attempt be made, in consultation with the Town Council, to see how this landscaping effort can be reinstated, in whatever form, elsewhere in the development.

We would support the suggestion that the area of land at the edge of the site at the top of Finchampstead Road be landscaped to provide a seating area with shrubs around it, to mirror the ‘Carnival Corner’ location across the road that we have helped to plant.”.

4. Road crossings

We strongly support the installation of a signalised pedestrian crossing from the promenade to the other side of Wellington Road, but (as we said in our earlier submission) we would also ask that careful thought be given to providing safe crossings for people around the Carnival Pool roundabout, so that pedestrians can get from Finchampstead Road to Denmark Street and vice versa without having to go all the way to the promenade crossing. Could you also see what can be done about the lack of a crossing around the Pavilions/future McCarthy and Stone area since Section 106 money was reserved for this purpose?

Thank you.

Yours faithfully

A handwritten signature in black ink that reads "Peter Must". The signature is written in a cursive style with a long horizontal stroke at the end.

Peter Must
Chairman

Development Management
Wokingham Borough Council
PO Box 157
Shute End
Wokingham
Berkshire
RG40 2AL