

The information, recommendations and advice contained in this report are correct as at the date of preparation, which is more than two weeks in advance of the Committee meeting. Because of these time constraints some reports may have been prepared in advance of the final date given for consultee responses or neighbour comment. Any changes or necessary updates to the report will be made orally at the Committee meeting.

Case Officer	Sarita Jones
Application No.	18/00489/FULPP
Date Valid	23rd July 2018
Expiry date of consultations	13th August 2018
Proposal	Demolition of existing bungalow and erection of a two storey extension to existing doctors surgery with provision of additional car and cycle parking
Address	<b>68 - 70 Giffard Drive Farnborough Hampshire</b>
Ward	West Heath
Applicant	Giffard Drive Surgery
Agent	Mrs Rebecca Lord
Recommendation	<b>REFUSE</b>

### Description

The site is located at the junction of Giffard Drive and Brabon Road and comprises 68 and 70 Giffard Drive. 68 Giffard Drive is a previously extended detached two storey building in use as a doctors' surgery with associated areas of hardsurfacing to the front and side in use as car parking. As existing there are nine consulting/treatment rooms with associated offices, kitchen/staff room and waiting area. The patient list currently comprises 9100 patients. The surgery's current opening hours are 8.30am 8pm on Mondays, 8.30am to 6.30pm Tuesdays to Fridays, every seventh Friday open until 8pm and alternate Saturdays 8.30am to 12.15pm. Vehicular access is from both Giffard Drive and Brabon Road. Four car parking spaces have access onto Giffard Drive, one of which is for disabled use. Eight car parking spaces have access onto Brabon Road.

70 Giffard Drives lies to the north of the doctors' surgery and is a detached bungalow with gardens to the front and rear. It has a drive with vehicular access from Giffard Drive. 72 Giffard Drive is to the north of the site and comprises one of a pair of two storey semi-detached houses with car parking to the front and access from Giffard Drive.

8 Brabon Road lies to the east of the site and also comprises one of a pair of two storey semi-detached houses. This property has a drive to the front and side, and access from Brabon Road.

There is a detached garage part of the common boundary with the application site.

There is a regular bus service on Giffard Drive. Blunden Hall is located at the end of Blunden Road. This is a community/recreational building which serves the Brookside pre-school and the surrounding recreation ground. There is a footpath link from the Blunden Hall car park to Giffard Drive some 125 metres to the west of the site as the crow flies. This footpath also crosses Cove Brook.

### **Relevant Planning History**

As reference is made in the submitted travel plan to Blunden Hall Blunden Road, the following planning permission is considered to be relevant. In 1999 planning permission, 99/00306/RBCRG3, was granted for the demolition of the existing and the erection of a replacement hall for uses including field study centre, canoe store and other facilities. This permission has been implemented. Thirty car parking spaces were approved for this facility, of which three were for disabled use. (Officer note: there are 37 spaces on site, of which two are for disabled use). A gated single lane entrance from Blunden Road was approved to serve the site. This was implemented and remains the access arrangement at time of writing.

As reference is made to the Voyager project in the supporting documentation, the following planning application is also considered to be relevant. In November 2017 planning permission, 17/00787/COUPP, was granted for the installation of secure bin and covered cycle store outbuildings; and change of use of existing offices (Use Class B1) to community healthcare resources hub (Use Class D1) for healthcare delivery for Farnborough. When fully operational the proposal assumed that the approved building would be open for patient care between the hours of 8am and 8pm seven days a week. A range of primary and community services would be available including General Practitioner/Nurse Practitioner appointments, as well as Urgent Care services, Community Care services and Community Mental Health services. It is noted that, at the Cabinet meeting held on 21 August 2018, a report was considered which gave an update on the proposed acquisition of the Voyager Building, Apollo Rise, Southwood Business Park, Farnborough by Rushmoor Borough Council. This included using compulsory purchase powers to deliver, in partnership with the North East Hampshire and Farnham Clinical Commissioning Group, an Integrated Care Centre for the Farnborough locality. The Cabinet resolved to approve the updated Statement of Reasons for making the Order, as set out in Appendix 1 to Report No. LEG1808, and the making of the Compulsory Purchase Order and map, as set out in Appendix 2 to the Report.

In March 1990 planning permission, RSH 6826, was granted for the erection of a first floor extension over the existing single storey surgery. This permission, which was implemented, included a condition which required that the first floor windows in the north and east elevations were completed in obscure glazed with any opening vents being inward opening only, all to be thereafter maintained in that condition. This was implemented.

In 2004 planning permission, 04/00945/FUL, was granted for the demolition of the existing bungalow at 70 Giffard Drive and the erection of a two storey extension to the surgery (11.5 metres by 13.5 metres) with external works and car parking. The ridge height for the two storey element of the extension was set down from the main ridge of the existing surgery building (some 7.4 metres). The first floor element of the proposal was set in from both the side and rear boundaries with 72 Giffard Drive and 8 Brabon Road to ensure that satisfactory building relationships resulted. Furthermore the approved footprint was set back from the front elevation of the existing surgery. It was to be built in external materials to match the

existing building. A total of 14 car parking spaces were approved to serve the extended premises. It is noted that in this submission the surgery advised that the proposal would not result in an increase in the number of patients (at that time a patient list of 7300 was advised in the submitted development statement albeit condition 3 attached to this permission allowed a patient list of up to 7500). This permission was not implemented.

## **The Current Proposal**

The current proposal seeks permission for the demolition of the existing bungalow at 70 Giffard Drive and the erection of a two storey extension to the surgery (some 11.4 metres by just under 15 metres) with provision of additional car and cycle parking. A terrace/planting area on the east side of the building is proposed to be used as a courtyard garden. The design of the extension is a mirror of the existing building with a gabled pitched roof set just below the existing ridge line resulting in a valley between the existing building and proposed extension. The proposed external materials include PPC aluminium windows, doors, rooflights, louvres, fascia and gate in a dark grey finish and a buff coloured facing brick. Internal alterations associated with the improvement of the surgery and new windows/doors are proposed in the existing building to match those proposed in the extension. Vehicular access remains from both Brabon Road and Giffard Drive with nine spaces proposed from Brabon Road and nine spaces from Giffard Drive, two of which are proposed for disabled use. The patient entrance is shown on the Giffard Drive elevation with the staff entrance proposed on the Brabon Road elevation. Cycle parking for seven cycles is proposed adjacent to the bin store on Giffard Drive.

As proposed the extended building would provide sixteen consulting/treatment rooms with associated meeting room, offices, kitchen/staff room and waiting area. The supporting information indicates that it is anticipated that the patient list will increase at about 300 patients per annum over the next few years. The supporting healthcare planning statement submitted by the North East Hampshire and Farnham Clinical Commissioning Group advises that once completed the extension and remodelling of the Giffard Drive surgery can facilitate the delivery of various core criteria as required by NHS England including facilitating 7 day access to effective care on a locality basis including the possibility of 8-8 working.

The application is supported by a Healthcare planning statement prepared by the North East Hampshire and Farnham Clinical Commissioning Group in support of the proposal, letters from the Partnership Director of Finance and the Estates Advisor of the North East Hampshire and Farnham Clinical Commissioning Group in support of the proposal, a planning support statement, a SUDS statement, a plan of the Giffard Drive surgery catchment area (officer note the Jenner House and Southwood practices are also located within the defined catchment area), a transport statement and a travel plan.

The submitted planning support statement states that in February 2018 public consultation was undertaken by the surgery with both the patient group and the wider community. This resulted in 143 persons in support of the scheme, 22 persons with mixed reactions and 2 persons who objected to the scheme.

## **Consultee Responses**

Environment Agency	does not wish to be consulted on this application.
HCC Highways Development Planning	raises objection to the proposal.

Hampshire Fire & Rescue Service	advises that the development should be in accordance with Approved Document B5 of the Building Regulations and section 12 of the Hampshire Act 1983. Advisory comments are made in relation to access for high reach appliances, fire protection, testing of fire safety systems and the use of timber framed buildings.
Environmental Health	raises no objection subject to condition.
Planning Policy	provides the policy context for the proposal
Surface Water Drainage Consultations	advise that as the site is less than a hectare in area, there is no need for them to comment on the application.
Thames Water	advises that the development is in proximity to public sewers. It raises no objection to the proposal on surface water grounds on the basis that the developer will follow the sequential approach to the disposal of surface water nor in relation to the waste water network/waste water process infrastructure capacity.

### **Neighbours notified**

In addition to posting a site notice, 55 individual letters of notification were sent to addresses in Beta Road, Brabon Road, Coleville Road and Giffard Drive

### **Neighbour comments**

Written objections and CDs providing photographic evidence of on street parking in the vicinity of the surgery (from 87 and 91 Giffard Drive), have been received from 83, 87 and 91 Giffard Drive citing objections on the following grounds:

- existing parking is poor and the proposed parking for the new layout of the surgery is inadequate;
- new parking at Blunden Hall would work if parking restrictions are put in place in Brandon Road (sic) (officer note believe this should be Brabon Road) to prohibit people from parking illegally or badly;
- fail to believe that patients will use Blunden Hall parking in bad weather or if have mobility issues;
- inconsiderate on street parking by doctors and patients in Giffard Drive, Brabon Road and Beta Road (photos provided on CD);
- insufficient car parking on site at present and the proposed extension will only exacerbate the problem;
- repeated instances of doctors parking in Giffard Drive all day long when there have been empty spaces in their allocated place;
- parking spaces onto Giffard Drive are so dangerous;
- footpath on Brabon Road has on numerous occasions been used as an extension to the main car park by cars parking on it, notwithstanding any wheelchair user or pushchair that might want to get past;
- concern about accessibility for emergency vehicles;

- disabled parking space constantly abused by able bodied people;
- proposed extension would also remove some existing on street parking spaces;
- travel plan indicates that Blunden Hall is a free public car park and surgery would encourage patients and visitors to use the car park;
- Blunden Hall is not a public car park, it is for the sole use of users of Blunden Hall and the adjacent park and swings;
- note that Council has given written approval for Blunden Hall car park to be used as the primary car park during the construction period of the car park and remodelling of surgery;
- concerns about use of footpath between Giffard Drive and Blunden Hall on dark winter nights;
- travel plan states that 58.15% of patients and 77% of employees use their cars to travel to the surgery, this will not change and will only increase if the planning application is granted;
- patients will not use Blunden Hall car park as it will inconvenience them too much particularly the very sick;
- traffic flow in Blunden Road would increase considerably and inconvenience the residents in Blunden Road and surrounding road;
- 7 day opening including the possibility of 8-8 working is absolutely horrifying;
- if proposed plans for the merger of Milestone Surgery and Southwood Practice in 2019 (source Farnborough Matters Farnborough and Cove Branch of the Labour party) (officer note this merger will take place on 1 October 2018 and the merged surgeries will be known as Voyager Family Health) and the delivery of a new centre for health in Farnborough similar to the already established Centre for Health in Aldershot (source Action 4 Rushmoor issued by the Conservatives) go ahead surely the pressure would be taken off local doctors surgeries such as Giffard Drive and Jenner House on Cove Road;
- ongoing issues with bin store;
- the surgery has outgrown the site already and enough is enough;
- loss of privacy to adjoining neighbours;
- car parking spaces block emergency routes;
- does not meet the Council's adopted car and cycle parking standards in terms of size and number of parking spaces;
- given existing users of Blunden Hall and it is available for hire, a traffic survey should be undertaken to ascertain its usage as 2000 additional traffic movements a month associated with the surgery are likely as the number of patients attending the surgery increase due to the additional doctors and other services they propose to offer;
- a travel plan should be provided prior to any permission being granted and also in relation to the construction phase;
- accuracy of plans;
- parking restrictions should be put in place including permit parking;
- an alternative location with adequate parking should be sought eg at Oak Farm;
- number of people using the bus to visit the surgery is very low at present;
- given number of consultation rooms and intention to carry out minor surgery more a health centre than doctors surgery then health centre parking standard should apply;
- conflict with the Highways Act 1835 with regard to obstruction of footpath or causeway by the side of the road for use by pedestrians;
- information on travel plans provided in respect of Planning Policy Guidance Note 13 (officer note this has been superseded by the National Planning Policy Framework/Practice Guidance);
- loss of on street parking

Representations have been received from 51 Beta Road, 26 Birchett Road, 9 Burnsall Close, 25 Chaucer Road, 27 Chamomile Gardens, 23 Clouston Road, 24 Fennel Close, 186 Fernhill Road, 72 Fleet Road, 51 Giffard Drive, 6 Glebe Road, 24 and 30 Houseman Road, 12

Oldwood Chase, 15 Prospect Avenue, 161 Prospect Road, 50 Southlands Chineham, Dene Healthcare Unit Leeds, 95 Carfax Avenue Tongham writing in support of the proposal as follows:

- old surgery building and no longer fit for purposes with increasing population and healthcare needs;
- new building with improved parking would improve local roads, make accessibility better (new lift) and hopefully attract health care professionals to work and would benefit/provide health services for Rushmoor residents;
- plans look well designed;
- proposal will support new housing developments within Farnborough;
- the development can only improve its availability and access to the general public;
- any surgery development will be beneficial for existing patients, the local area and the staff who work there;
- this extension will bring extra facilities/services that will offer the doctors, other NHS practitioners and office staff more space to work in;
- much needed as patient numbers have grown considerably;
- a welcome proposal;
- impressed with the background thinking that was evident in the development using on line communication to minimise the need for visits and parking;
- plans will allow more effective use of improved facilities;
- more localisation of NHS services is a very good thing;
- the design increase the capacity of the surgery by a considerable amount without the need for an overbearing design;
- this design is in keeping with the area;
- the demands and requirements in Primary Care are escalating at an unbelievable rate and projects like this will go some way to assuring that the traditional friendly small to medium sized well run surgeries are able to prevail in the evolving landscape;
- exciting opportunity for Farnborough;
- surgery is one of the highest rated in Farnborough with patients out of the catchment area trying to register for it;
- the extra space will enable the practice to offer more services, saving patients the need to travel further afield;
- long overdue;
- staff using the car parking facilities at Blunden Hall and extra slots at the surgery will relieve the surgery car parking;
- the proposed secure, covered bicycle spaces should make patients happier to cycle to their appointment

A representation has been received from 60 Giffard Drive raising no objection to the development

Representations have been received from 89 and 95 Giffard Drive as follows:

- agrees that the surgery is in need of development and expansion;
- notes that the parking is an absolute nightmare, given that the car park is full before patients can use it;
- parking in adjoining roads is horrendous;
- the increase in the size of the surgery, employing more staff and increasing patient numbers will only make this matter worse;
- car parking needs to be addressed to make this development work successfully;
- concerned about noise disturbance during construction and seeks controls on working

hours;

- seeks assurances that suitable interim parking arrangements for patients and construction vehicles are in place so that residents driveways are not blocked.

## **Policy and determining issues**

The site is located within the built up area of Farnborough. As such "saved" local plan policies ENV17 (General Development Design and Criteria), ENV21 and ENV22 (Access for people with disabilities), ENV45 (Community Facilities), ENV48 and ENV50 (Environmental Pollution and Noise), H13 (Loss of housing) and TR10 , policies SP7 (Neighbourhood renewal), CP1 (Sustainable Development Principles), CP2 (Design and Heritage), CP3 (Renewable Energy and Sustainable Construction, CP4 (Surface Water Flooding), CP10 (Infrastructure Provision), CP16 (Reducing and Managing Travel Demand) and CP17 (Investing in Transport) of the Rushmoor Core Strategy are relevant to the consideration of this proposal. The Council's adopted planning documents (SPD) on 'Planning Contributions - Transport' 2008 and 'Car and Cycle Parking Standards', 2017 and the advice contained in the National Planning Policy Framework (NPPF)/National Planning Practice Guidance are also relevant.

The Council published the draft submission version of the Local Plan for public consultation between Friday 9 June and Friday 21 July 2017. The Council's Planning Policy team have processed all the representations that have been received, prepared a report which has summarised the issues raised during the consultation and set out the Council's response. On 2 February 2018, this report, together with all the 'duly made' representations received during the consultation period, were submitted to the Planning Inspectorate for examination, alongside the plan and its supporting documents.

A planning inspector has been appointed. She held a public hearing which took place in May this year. Given this, and recognising that they currently have limited weight, policies IN1 (Infrastructure and Community Facilities), IN2 (Transport), D1 (Design in the Built Environment), DE5 (Proposals affecting existing residential (C3) uses), DE10 (Pollution), NE8 (Sustainable Drainage Systems) are also relevant to the consideration of this proposal.

The main determining issues are the principle of development, the impact on the character of the area, the impact on adjoining residents, flood risk and the water environment, highway considerations and provision of facilities for people with disabilities

## **Commentary**

### The principle of development

The proposal will result in the result of an existing dwelling. As such "saved" local plan policy H13 and policy DE5 of the Draft submission Rushmoor Local Plan, as proposed to be amended, are relevant to the consideration of this proposal. Both policies resist the loss of residential accommodation unless special circumstances are met which would justify such a loss. In this regard policy H13 advises, inter alia, that the proposed use is ancillary to the residential character of the area and would provide an essential community facility which cannot be provided elsewhere. With regard to policy DE5 one of special circumstances include the provision of an essential community facility which cannot be provided elsewhere. Given this the Rushmoor Infrastructure Plan (January 2018) provides background evidence as to the key elements of physical and social infrastructure likely to be needed in the Borough up to 2032 to support delivery of the Rushmoor Local Plan. This plan identifies that

GPs are universally facing operational and financial pressures and many are in buildings which require investment to maintain their suitability and capacity for modern health care needs and services. In this case it is recognised that the existing doctors surgery is a valued community facility which is reflected by the surgery's Good rating stated in the Quality Report issued by the Care Quality Commission in October 2016 as updated by the Care Quality Commission GP Insight report dated June 2017. Furthermore the North East Hampshire and Farnham Clinical Commissioning Group (CCG) has confirmed that:

"the proposed extension at Giffard Drive only just brings the Practice up to the recommended floor area and clinical capacity for its prevailing list size. The current premises are now too small and compromised in relation to meeting current and expected demands; the local communities are continuing to grow, and there is an increasing likelihood without this scheme that future patients seeking care within this location may have difficulty in being accommodated. Any reduction in the proposals for the as built floorspace at Giffard Drive Surgery would directly impact on the practices' ability to provide and sustain a high standard of care.

The CCG acknowledges that a prolonged search for alternative sites within the catchment area was unsuccessful after exploration of the Chapel Lane site provided to be uneconomic, and that extending the existing premises at Giffard Drive Surgery remains the only viable and practical option"

Having regard to the above, no objection is raised to the principle of the loss of the dwelling nor to the extension of the premises subject to consideration of the following matters.

#### The impact on the character of the area

As existing the doctors surgery comprises a two storey building which is generally larger than existing development in the vicinity. 68 Giffard Drive, being a bungalow, is small both in terms of footprint, height and massing. It is, in itself, unusual given that the predominant height of buildings in the vicinity of the site are generally two storey. This, together with the single storey garage and gardens to front and rear, means that there is a feeling of spaciousness around the built form. The footprint of the proposed extension is within 1.325 metres of the boundary with 72 Giffard Drive and 1.334 metres of the boundary with 8 Brabon Road. This means that the proposed extension effectively infills the space between the site and the adjoining properties to the north and east. The proposed extension would have a gable front onto Giffard Drive with a flat roof link between the existing and proposed built form. This results in a somewhat disjointed appearance whilst concluding that this design has been chosen to minimise the bulk of the roof to improve the impact of the extension in amenity terms. Whilst the existing building pays regard to the residential pattern of fenestration commonly seen in the area, the proposal has one large window on the Giffard Drive frontage which results in a largely unrelieved first floor elevation. The proposal is not considered to have a positive contribution to the area and objection is raised to the proposal in this regard

#### The impact on adjoining residents

The closest residents affected by the proposed extension are situated at 72 Giffard Drive to the north and 8 Brabon Road to the east. It is noted, and regard has been had, to the solar study that has been provided within the submitted design and access statement.

With regard to 8 Brabon Road, the occupiers of this property were written to with a view to



visiting their property to assess the proposal. This property was also visited on two separate occasions. The occupiers have recently advised that they are tenants. As they are moving week commencing 3 September the proposal does not concern them much and advise to contact the new tenants who move in on 15 September. Details of the landlord have been requested. Given this, the impact on 8 Brabon Road has therefore been assessed from 70 Giffard Drive and the Brabon Road/Giffard Drive streetscenes. This dwelling is a detached bungalow with detached garage located to the east of the application site. It is noted that the proposed first floor element extends further down the common boundary and the overall footprint is larger when compared to the extension approved in 2004. The height, width, massing and proximity of the proposed extension is considered to result in harmful overbearing/overshadowing impacts, have an unacceptable sense of enclosure to the rear garden of 8 Brabon Road and a general loss of outlook. As such objection is raised to the proposal in this regard. An additional window is proposed in the first floor east elevation which would directly overlook the rear garden of 8 Brabon Road. It is noted that the pattern of overlooking proposed reflects that which currently takes place between the surgery and 8 Brabon Road, albeit with an increase of one window. In the event that planning permission were to be granted, it would be appropriate to obscure glaze this window and make it top opening only. Subject to this acceptable levels of privacy to the occupiers of 8 Brabon Road could be safeguarded. The proposed terrace/planting area will introduce levels of activity, noise and use, which currently do not take place, adjacent to the common boundary with 8 Brabon Road. Given the screening afforded by the existing single garage on the common boundary and potential for additional fencing/controls on hours of use, it is considered that in the event that planning permission were to be granted, these impacts could be satisfactorily addressed by way of condition.

With regard to the impact on 72 Giffard Drive, this property was visited and a card left for a visit to be arranged. No response has been received at the time of the preparation of this report. As such the impact has been assessed from 70 Giffard Drive and the Brabon Road/Giffard Drive street scenes. This property is one half of a pair of semi-detached houses located to the north of the application site. It is noted that the proposed first floor element is closer to this property and the overall footprint is larger when compared to the extension approved in 2004. The height, massing and proximity of the proposed extension will result in a loss of light to the first floor window in the side elevation. Given that a separation distance of some 4.3 metres is retained and as this window serves a stairwell, the resultant impact is not considered to be materially harmful to justify the refusal of the application on this ground. However the proposal is considered to result in harmful overbearing/overshadowing impacts, an unacceptable sense of enclosure to the rear garden of 72 Giffard Drive and a general loss of outlook. As such objection is raised to the proposal in this regard. The proposed extension will be forward of 72 Giffard Drive by some 1.3 metres. Whilst this will change the building relationships between the two buildings, this is not considered to result in material harm to the residents of 72 Giffard Drive. No objection is therefore raised to the proposal on this ground. Additional windows are proposed in the first floor north elevation which would directly overlook this property and its rear garden. It is noted that the pattern of overlooking proposed reflects that which currently takes place between the surgery and 70 Giffard Drive, albeit with an increase of one window. Given that velux windows are proposed in the roof slope above the consulting/treatment rooms which have these overlooking windows, in the event that planning permission were to be granted, it would be appropriate to obscure glaze the windows in the first floor side elevation and make them top opening only. This may be secured by way of condition and would follow the general approach taken on this issue in 1990. Subject to this acceptable levels of privacy to the occupiers of 72 Giffard Drive could be safeguarded.

Given the separation distances to properties to the south and west of the proposed development and having regard to existing building relationships/pattern of overlooking no objection is raised to the proposal in terms of adverse impact resulting from the development on these residents.

It is recognised that residents in the vicinity of the site experience problems associated with car parking associated with users of the surgery as evidenced by the photographs submitted by residents objecting to the proposal. However both Giffard Drive and Brabon Road are public highways. As such the public may use them for the parking of vehicles. In the event vehicles are an obstruction they fall to be dealt with under highway legislation enforced by Hampshire Constabulary. Whilst acknowledging that there are inconsiderate drivers who block driveways and sightlines and park on the pavement, the resultant impact is not considered to constitute material planning harm such that objection should be raised to the proposal in this regard.

### Flood risk and the water environment

The application is supported by a SUDs statement. However whilst the proposed extension has a footprint of less than 250 sq m and as such it is classed as minor extension by the Environment Agency, a flood risk assessment is also required as the site is located within Flood Zone 2. No such assessment has been submitted.

As can be seen from the consultation responses above, given the size of the development, the Environment Agency and Hampshire County Council as Lead Local Flood Authority have both declined to comment on grounds of flood risk. On this basis the Council is referred to standing advice issued the Environment Agency which provides the following information:

Minor developments are unlikely to raise significant flood risk issues unless:

- they would have an adverse effect on a watercourse, floodplain or its flood defences;
- they would impede access to flood defence and management facilities, or;
- where the cumulative impact of such developments would have a significant effect on local flood storage capacity or flood flows.

The Environment Agency's advice on flood risk assessment seeks to ensure that extensions or alterations are designed and constructed to conform to any flood protection already incorporated in the property, and include flood resilience measures in the design.

In this regard they advise that floor levels are either no lower than existing floor levels or 300 millimetres (mm) above the estimated flood level. If proposed floor levels are not going to be 300mm above existing flood levels, further information is required in relation to flood resistance and resilience measures. The agent has advised that a flood risk assessment is being prepared but no such information has been submitted in support of the proposal. As such objection is raised to the proposal in this regard.

### Highway considerations

It is acknowledged that the surgery has issues with car parking. This is evidenced by existing levels of on street parking in the vicinity of the surgery and the photographs provided by residents covering a period of many months.

The planning agent has confirmed that:

"the proposed extension is primarily to improve deficiencies in the existing surgery so that the practice can deliver healthcare services in a fit for purpose environment. The increase in floor area will also allow for some limited increase in patient numbers in line with local growth and demand, however essentially the increase is to ensure that current operational needs are met. This is confirmed in the CCG letter which advises the existing floor area is too small for the patient list. As such it is not possible to draw a direct correlation between the proposed floor area and number of consulting rooms and the level of traffic generated"

These comments have been noted but raise concerns. The application states that the existing patient list is 9100, with an increase of about "300 patients per annum over the next few years". In just three years this could represent an increase of 900 patients, notwithstanding any increase in subsequent years, which is not considered to be a limited increase. It is noted that this is a significantly higher increase than that experienced to date, for example, when the planning application was submitted in 2004 the patient list was around 7300. Given that the current patient list is 9100, this means that the increase in patient numbers since 2004 has been about 129 per annum, significantly less than that currently indicated. Furthermore it is also noted that, whilst recognising that the condition was not enforceable, the reason for the restriction on patient numbers imposed in 2004 was in the interests of highway safety.

It is long established that the car parking standard for health establishments is based on the number of consulting rooms. In this regard the Council's adopted car parking standard requires 3 spaces per consulting room.

The County Highway Authority has been consulted on this application. Whilst raising no objection to the proposed access arrangements, it makes the following comments on parking and the travel plan:

"The parking standards for the site are laid down by Rushmoor Borough Council (RBC) as the local parking authority, in accordance with their Supplementary Planning Document (SPD) as adopted in November 2017.

Parking standards are applied to the increase in use and are not retrospectively applied to any existing shortfalls in parking.

These standards require the provision of 3 parking spaces per consulting room. It can be reasonably argued that treatment rooms should fall into this category, and as such, both scenarios will be assessed.

#### Consulting rooms only

There is a net increase of 4 consulting rooms, requiring 12 additional spaces. The provision of 6 spaces results in a 50% shortfall which is not acceptable. The displacement of cars on the local road network could lead to highway safety issues. Local residents have commented of the existing parking struggles at the site and lack of on street parking in the area. The under provision of car parking would exacerbate this issue.

#### Consulting and treatment rooms

Taking into account both consulting and treatment rooms, there is a net increase of 7 rooms

requiring a total of 21 spaces. The provision of 6 spaces results in a shortfall of 71% which is a worse case than above. This consideration could lead to the displacement of 15 vehicles on the surround (sic) residential streets which would not be in the interests of highway safety or local residents.

#### Staff parking and travel plan

The submitted Travel Plan (TP) indicates that 77% of staff drive a car to work. Using information from the application form, (indicating the equivalent of 16 full time staff), this would result in 12 members of staff requiring a parking space. This would leave 6 spaces free for patients. As above this would result in the displacement of car parking to the detriment of highway safety.

It is noted that although the surgery is doubling in size, the application form implies staffing levels are to remain the same. The Highway Authority would wish to see clarification that this is the case, and if not, what the net change in staffing levels would be. It would also be beneficial to have the peak staffing levels to ascertain the true (sic) impact on the car park. (Officer note the agent has advised that this will be submitted but has not been received at time of writing)

Notwithstanding the above, the TP does not set out any targets to reduce the use of the private car. Whilst the TP states how sustainable travel is to be promoted and that the Travel plan Co-ordinator will regularly review the plan against the targets, without specific targets set, the TP becomes ineffective."

In conclusion the Highway Authority would recommend refusal on ground of inadequate car parking provision and inadequate travel plan.

The agent confirms that -

"The focus of the improvement measures in the Transport Statement (TS) is the provision of a Travel Plan (TP), which includes encouragement for staff and patients to use public transport and walking, also staff sharing and parking at Blunden Hall car park nearby or on the road some distance from the surgery. These measures together with the increase in available spaces on site should alleviate any existing on street parking pressure locally. The TP can be secured by planning condition"

The submitted travel plan makes the following statements in relation to car parking:

"7.8 In order to avoid excessive on street parking, all employees (with the exception of doctors on call) would be encouraged to use the Council owned Blunden Hall car park, some 140m walking distance west of the site.

7.9 Blunden Hall car park is a free public car park and the surgery would encourage patients and visitors to use the car park. The car park would be used as the primary car park during the construction period of the extension and remodelling of the surgery, for which written approval has been obtained from the Council.

7.10 The employee surveys show some 9 employees park on site in the surgery's car park, which take up vehicles spaces for patients and visitors. The survey also confirmed that 7 employees park on street. The relocation of those employees vehicles would significantly reduce the on-street parking demands.

7.11 The increase in the number of car parking spaces provided from 12 to 18 spaces and employees parking off -site and at Blunden Hall car park, should ensure the level of on street parking associated with the site is minimal and significantly better than currently taking place."

There are a number of concerns about this approach. With regard to the availability of car parking at Blunden Hall it is relevant to note that the level of car parking sought for the redevelopment of Blunden Hall reflected the recreational/community use of the site. It did, and does, not make provision for other uses in the area. Whilst the car park is within the ownership and control of Rushmoor Borough Council, it is ancillary to Blunden Hall as a recreation/community site and is available for public use in this regard. It is not one of the Council's public car parks operated by the Council's parking service. The views of the Head of Community and Environmental Services who is responsible for Blunden Hall have been sought on this issue. He advises that the Council has agreed to the use of Blunden Hall car park during the construction period. However the Council has not agreed to the use of the car park on a permanent basis. He advises that the surgery would need to prove that there was sufficient capacity for the number of vehicles they are proposing in order not to adversely affect the regular users. He is of the view that a study needs to be undertaken to determine the usage. Whilst he is of the view that the car park could accommodate 16 staff cars he would not want patients parking as well as this could lead to an on-street parking issue in the turning circle at the end of Blunden Road. He concludes by advising that he feels:

"... the surgery have made an assumption that they can use the public car park, without any consultation with the Council, but clearly the original planning permission was only approved for the use of hall, playground and dog walkers etc and no other users. Unless spare capacity is proven, then I wouldn't support the parking by patients but we could concede some spaces for their staff"

Furthermore there are concerns that the proposed car parking spaces are substandard in size. The minimum size for a parking space for new development is 4.8 metres by 2.5 metres. In addition 1.2 metre margins in length and width are required for a parking space for a person with disabilities. It is also noted that at least two existing on street car parking provision would be removed from public use as a result of this proposal. The adopted parking standard also states that the widths and lengths of spaces may need to increase if those spaces are next to a wall or footway for example in this case spaces 4,9 and 10-18 inclusive. The County Highway Authority has provided further information on the size of the car parking spaces. The proposed parking layout shows new and reconfigured parking spaces. The County Highway Authority has confirmed that none of the proposed spaces wholly meet the current size requirements, nor are appropriate length margins proposed for the spaces for use by people with disabilities. This further undermines the lack of car parking provision.

In the absence of clarity and certainty, it has not been satisfactorily demonstrated that that alternative car parking facilities are available in perpetuity to address the shortfall, in part or in whole, in on site car parking provision. As such objection is raised to the proposal in this regard.

As the proposal is recommended for refusal by the County Highway Authority no transport contribution is sought.

Having regard to the above objection is raised to the proposal in terms of inadequate parking provision and travel plan.

#### Provision of facilities for people with disabilities

The proposed facilities include level thresholds to all external doors, a lift to the first floor, an accessible toilet located on the first floor and additional disabled parking provision. These facilities are considered to be appropriate in accessibility terms and are acceptable.

In conclusion it is recognised that there are benefits associated with the development in that it would provide improved healthcare facilities to serve the local community and provide employment during and post construction and training facilities for health care workers. This is further evidenced by the written support for the proposal by the North East Hampshire and Farnham Clinical commissioning group. However, whilst having regard to these benefits, the harm associated with the proposal as set out above is so significant that, in the planning balance, they do not override the harm associated with the development and as such the proposal is recommended for refusal.

#### Full Recommendation

It is recommended that planning permission be **REFUSED** for the following reasons:

- 1 The development is unacceptable in highway terms in that inadequate car parking provision has been provided which would be likely to encourage the parking of vehicles on the public highway interrupting the free flow of traffic to the detriment of highway safety. Moreover it has not been satisfactorily demonstrated that alternative car parking facilities are available in perpetuity to address the shortfall, in part or in whole, in car parking provision. In addition the submitted travel plan does not set out any targets to reduce the use of the private car. The proposal therefore conflicts with the objectives of policy CP16 of the Rushmoor Core Strategy and the Council's adopted Car and Cycle Parking Standards 2017. Regard has also been had to policy IN2 of the Rushmoor Local Plan Draft Submission June 2017.
- 2 By virtue of its footprint, massing and width the proposed building does not respect the character and appearance of the local area. As such the proposal is considered to conflict with policies CP1 and CP2 of the Rushmoor Core Strategy and "saved" local plan policy ENV17. Regard has also been had to policy D1 of the Rushmoor Local Plan Draft Submission June 2017 as proposed to be amended.
- 3 By virtue of the proximity, footprint, massing, width and height of the building the proposal is considered to result in an unacceptable loss of light and outlook and create an unacceptable sense of enclosure and overbearing impacts to residents of 72 Giffard Drive and 8 Brabon Road. As such the proposal conflicts with policy CP2 of the Rushmoor Core Strategy and "saved" local plan policy ENV17.
- 4 In the absence of a flood risk assessment it has not been demonstrated that the proposal has satisfactorily addressed the issue of flood risk. As such the proposal conflicts with the objectives of policy CP4 of the Rushmoor Core Strategy and paragraph 165 of the National Planning Policy Framework. Regard has also been had to policy NE6 of the Rushmoor Local Plan Draft Submission 2017 as proposed to be amended.

## **Informative**

- 1 **INFORMATIVE** – The Local Planning Authority’s commitment to working with the applicants in a positive and proactive way is demonstrated by its offer of pre-application discussion to all, and assistance in the validation and determination of applications through the provision of clear guidance regarding necessary supporting information or amendments both before and after submission, in line with the National Planning Policy Framework.







1 EXISTING SITE PLAN  
1/18/11

<b>ADP</b> ARCHITECTURAL DESIGN PARTNERS 10000 W. CENTURY BLVD., SUITE 100 WESTMINSTER, CO 80039 TEL: 303.440.1000 FAX: 303.440.1001 WWW.ADPARCHITECTS.COM	
PROJECT NO.: SHEET NO.: DATE:	DRAWN BY: CHECKED BY: APPROVED BY:



**LEGEND**

- 1. EXISTING EXTERIOR WALL
- 2. EXISTING EXTERIOR DOOR
- 3. EXISTING EXTERIOR WINDOW
- 4. EXISTING EXTERIOR ROOF
- 5. EXISTING EXTERIOR PORCH
- 6. EXISTING EXTERIOR STAIR
- 7. EXISTING EXTERIOR BALCONY
- 8. EXISTING EXTERIOR TERRACE
- 9. EXISTING EXTERIOR PATIO
- 10. EXISTING EXTERIOR DRIVEWAY
- 11. EXISTING EXTERIOR GARAGE
- 12. EXISTING EXTERIOR DRIVE
- 13. EXISTING EXTERIOR SIGN
- 14. EXISTING EXTERIOR LIGHT
- 15. EXISTING EXTERIOR VENT
- 16. EXISTING EXTERIOR AIR CONDITIONING
- 17. EXISTING EXTERIOR MECHANICAL
- 18. EXISTING EXTERIOR ELECTRICAL
- 19. EXISTING EXTERIOR PLUMBING
- 20. EXISTING EXTERIOR PAINT
- 21. EXISTING EXTERIOR FINISH
- 22. EXISTING EXTERIOR MATERIAL
- 23. EXISTING EXTERIOR COLOR
- 24. EXISTING EXTERIOR TEXTURE
- 25. EXISTING EXTERIOR DETAIL
- 26. EXISTING EXTERIOR JOINT
- 27. EXISTING EXTERIOR GROUND
- 28. EXISTING EXTERIOR GRADE
- 29. EXISTING EXTERIOR ELEVATION
- 30. EXISTING EXTERIOR SECTION



**A** EXISTING WEST ELEVATION  
1" = 100'



**B** EXISTING EAST ELEVATION  
1" = 100'



**C** EXISTING NORTH ELEVATION  
1" = 100'

**D** EXISTING SOUTH ELEVATION  
1" = 100'

NO.	DATE	DESCRIPTION
01	10/15/2023	ISSUED FOR PERMIT
02	10/20/2023	REVISIONS
03	11/01/2023	FINAL

FOR PLANNING







**CONTENTS**

- 1. COVER SHEET
- 2. GENERAL NOTES
- 3. SITE PLAN
- 4. FLOOR PLANS
- 5. SECTION ELEVATIONS
- 6. EXTERIOR FINISHES
- 7. MATERIAL SCHEDULE
- 8. SPECIFICATIONS
- 9. APPENDICES
- 10. INDEX



**A WEST ELEVATION**



**B EAST ELEVATION**



**C NORTH ELEVATION**

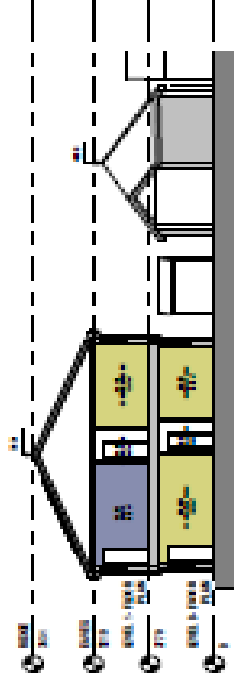
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DATE	DESCRIPTION
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10/10/2023	ISSUE FOR PERMIT
10/10/2023	ISSUE FOR PERMIT
10/10/2023	ISSUE FOR PERMIT

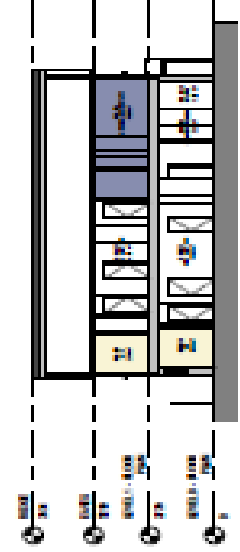
**FOR PLANNING**

**ADP ARCHITECTURAL DESIGN PRACTICE**

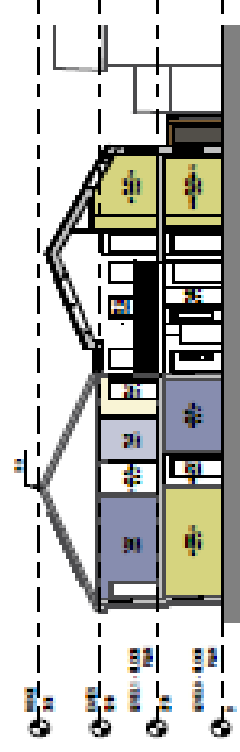
1000 BROADWAY, SUITE 1000  
 NEW YORK, NY 10004  
 TEL: (212) 512-1234  
 FAX: (212) 512-1234  
 WWW: WWW.ADPARCHITECT.COM



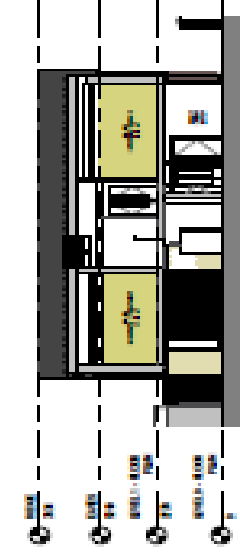
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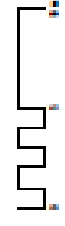
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**C** PROPOSED SECTION A  
1:100



**D** PROPOSED SECTION B  
1:100



**apc**

ARCHITECTURAL PROJECT CONSULTANTS  
 100% ARCHITECTURAL DESIGN  
 100% ARCHITECTURAL DESIGN  
 100% ARCHITECTURAL DESIGN

DATE	10/11/11
PROJECT	100% ARCHITECTURAL DESIGN
CLIENT	100% ARCHITECTURAL DESIGN
LOCATION	100% ARCHITECTURAL DESIGN
SCALE	1:100
PROJECT NO.	100% ARCHITECTURAL DESIGN
DESIGNER	100% ARCHITECTURAL DESIGN
CHECKED	100% ARCHITECTURAL DESIGN
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