# **Development Management Committee** 16<sup>th</sup> January 2019

Item 5 Report No.PLN1902 Section C

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 Bishop

Application No. 18/00818/FULPP

Date Valid 27th November 2018

Expiry date of

consultations

19th December 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 68 - 70 Giffard Drive Farnborough Hampshire

Ward West Heath

Applicant Giffard Drive Surgery

Agent Mrs Rebecca Lord

Recommendation Refuse

#### **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 comprises 9100 patients as of April 2018. The 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 preschool 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. 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 serves 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, and notwithstanding the assertions made in the planning support statement that no provision has been made through the planning system for any increased capacity to meet the demand for essential primary healthcare services, 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. The Compulsory Purchase Order was subsequently served in the autumn of 2018 and is the subject of an appeal by the landowner.

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

In July 2018 a planning application, 18/00489/FULPP was submitted 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 was shown to be used as a courtyard garden. The design of the extension was proposed to 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 included aluminium windows, doors, rooflights, louvres, fascia and gate in a dark grey finish and buff coloured facing brick. Internal alterations associated with the improvement of the surgery and new windows/doors were proposed in the existing building to match those proposed in the extension. Vehicular access remained from both Brabon Road and Giffard Drive with nine spaces shown from Brabon Road and nine spaces from Giffard Drive, two of which were shown for disabled use. The patient entrance was proposed on the Giffard Drive elevation with the staff entrance proposed on the Brabon Road elevation. Cycle parking for seven cycles were proposed adjacent to the bin store on Giffard Drive.

As proposed the extended building was to provide sixteen consulting/treatment rooms with associated meeting room, offices, kitchen/staff room and waiting area.

This application was due to be considered at the Development Management committee to be held on 12 September 2018 with a recommendation for refusal 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.

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."

The applicant withdrew the application on 10 September 2018 prior to determination.

The current application is almost identical to the one submitted in July 2018. The demolition, extension and provision of on-site car and cycle parking remain as before. Further information has now been submitted to address the issue of car parking provision and flood risk.

The supporting information indicates an anticipated increase in the surgery's patient list of 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 could 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 from the North East Hampshire and Farnham Clinical Commissioning Group, letters from the Partnership Director of Finance and the Estates Advisor of the North East Hampshire and Farnham Clinical Commissioning Group, a planning support statement, a design and access statement, a flood risk assessment and surface water strategy including SUDS, a SUDS statement, a Blunden Hall car park technical note, a plan of the Giffard Drive surgery catchment area (officer note the Jenner House and Southwood practices are also 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.

A Members' site visit took place on 5 January 2019.

## **Consultee Responses**

Environment Agency does not wish to be consulted on this development.

HCC Highways Development

Planning

raises a holding objection to the proposal

Hampshire Fire & Rescue No views received.

Environmental Health raise no objection to the proposal subject to conditions.

Planning Policy provides the policy context for the proposal.

Surface Water Drainage

Consultations

advises that due to the size of the development there is no need for the Lead Local Flood Authority to comment

on the proposal.

Thames Water No views received.

# **Neighbours notified**

In addition to posting two site notices (one outside the site on Giffard Drive and one outside Blunden Hall) 80 individual letters of notification were sent to properties in Beta Road, Birchett Road, Brabon Road, Burnsall Close, Chamomile Gardens, Chaucer Road, Clouston Road, Coleville Road, Fennel Close, Fernhill Road, Fleet Road, Giffard Drive, Glebe Road, Houseman Road, Oldwood Chase, Prospect Avenue, Prospect Road, Shepherds Walk and Southlands, Chineham, Gateway Drive Leeds and Carfax Avenue, Tongham.

## **Neighbour comments**

Representations from 87 and 91 Giffard Drive including CDs showing issues with car parking associated with the surgery (parking on pavements, parking on the junction of Brabon Road and Giffard Drive, haphazard parking etc) have been received raising objections to the proposal on the following grounds:

- Blunden Hall car park is for sole use of Blunden Hall, the park and swings;
- with the best will in the world the staff are not going to park in Blunden Hall car park particularly in winter;
- existing bungalow site should be converted into car parking;
- seems staff are now being asked to park on the roads instead of using the surgery car park;
- concerns raised about the existing bin store;
- parking bays are substandard in size;
- everyone should have access to a GP surgery in the best conditions available but not to the detriment of others;
- emergency escape routes are obstructed;
- loss of revenue to the Council as a result of the surgery having the parking spaces at Blunden Hall;
- clearly insufficient car parking in new proposal;
- childrens' safety when using the Blunden Hall car park;
- travel plan needs to be submitted;
- a lamp column blocks one of the parking spaces;
- double yellow lines should be used on Beta Road and Giffard Drive, with permit parking on Brabon Road:
- in the letter from the NHS it states that they look forward to 7 days a week 8am to 8pm working, guarantees should be received that this will not be the case due to issues with parking;
- surgery would be better served by finding an alternative location with adequate parking;
- number of people using a bus to the surgery at present is very low;
- parking on pavement in conflict with Highways Act 1835.

Representations from 51 Beta Road, 26 Birchett Road, 55 Broom Hill Road 7 Burnsall Close, 3 Canterbury Gardens, Flat 4 Birch House Cherrywood Road, 18 Church Lane, 56 Churchill Crescent, 23 Clouston Road, 31 Coleville Road, Milestone Surgery 208 Farnborough Road, 11 and 24 Fennel Close, 72 and 157 Fleet Road, 7 and 58 Giffard Drive, 2 Glebe Road, 20

Grace Bennett Close, 12, 50 and 73 Horn Road, 2 Kempton Court, 7 Mcnaughton Close, 19 Nightingale Close, 36 Northcote Road, 12 Northcott Gardens, 3 Nutmeg Court, 5 Oldwood Chase, 85 Pinewood Park, 15 Prospect Avenue, Prospect Road, 19 St Johns Road, Alexander House Surgery 2 Salisbury Road, 45 Saltram Road, 20 Sandy Lane, 37 Shepherds Walk, 209 Sycamore Road, 50 Victoria Road, 107 Wren Way and 5 York Road and Wideacres White Lane Ash Green, 13 Firacre Road Ash Vale, 2 Arun Court and Flat 6 Sunmit Court Crossborough Gardens Basingstoke, 4 Hayes Way Beckenham, Lynwood Barton Road Bramley, 31 Nugent Close Church Crookham, 5 The Bridle Path Ewell, 46 Compton Way Farnham, 18 Wood Lane Fleet, 141 Farnham Road Guildford, Unit 4-7 Gateway Drive Guiseley, 3 Compass Field Hook, 96 Briggate Knaresborough, Mitcham Physiotherapy Mitcham, 74 Cedar Drive Southwater, 95 Carfax Avenue Tongham, 49 Vineyard Hill Road Wimbledon and 16 Bellmans Cop York have been received in support of the proposal stating the following:

- the extension is well overdue and desperately needed;
- surgery gives excellent service but needs more clinical space;
- improved access to first floor:
- growing population means more doctors and medical staff needed;
- surgery will be enhanced with new accessible facilities and improved consultation/treatment rooms giving staff better working conditions and therefore better experience for patients;
- they have addressed the impact on the local area;
- patient list is growing:
- the proposal will alleviate any problems with parking outside neighbours properties;
- the current building is too small to serve the clinical needs of the surgery's population and allow effective space clinical and administrative staff;
- at a time when the area is absorbing an influx of housing development, extensions to primary care services are to be welcomed;
- the proposal will also hopefully attract Health Care professionals to the area;
- increased demand for Giffard Drive surgery and associated parking/traffic issues is caused by other housing developments in Farnborough which the new plans will hope to alleviate;
- sounds like a good plan for the ever expanding doctors surgery especially to have more parking spaces as at the moment cars park in a dangerous position where you are unable to see oncoming traffic when turning out of Brabon Road;
- parking should not be an issue where peoples' health is concerned;
- a larger doctors surgery would be a benefit in reducing waiting lists;
- hot desking should never be an option in a healthcare environment:
- application shows forethought and uses the increased space to maximum advantage:
- increase in car parking places and addition of more cycle racking will be welcome;
- the use of off-site car parking for staff will ease pressure:
- the surgery is a cornerstone of the local community;
- the proposed extension will safeguard the high quality of patient care for the future;
- the staff deserve all the support that can be given if only to repay some of the excellent service they have provided over the years;
- eliminate the need to visit hospitals for many minor procedures:
- Farnborough desperately need more GP facilities;
- the bigger picture in the country is a huge number of practices are closing down so any practice prepared to invest in the future should be supported;
- parking arrangements are acceptable and unlikely to have a negative impact on the surrounding properties:
- its a fantastic project;
- much needed extra parking would be great for patients visiting the surgery;
- it will benefit many people who live in the local catchment area and who walk to the surgery;
- it will greatly help waiting times for an appointment;

- it will add much needed capacity to infrastructure of primary care in Farnborough:
- approval of scheme desperately needed if the surgery is to maintain and further develop the exemplary patient services already provided;
- refusal of the application will deny the patients of the practice access to the requirements of government:
- will create more jobs within the community;
- development is fortunate to have been allocated extremely scarce NHS funding which is required to bring it forward and further delay risks jeopardising this position with a significant loss of benefit to the local area.

In the interests of clarity all representations are publically available during normal office hours for inspection.

# 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 held a public hearing in May 2018. Given this, and recognising that they are material considerations, policies IN1 (Infrastructure and Community Facilities), IN2 (Transport), D1 (Design in the Built Environment), DE5 (Proposals affecting existing residential (C3) uses), DE10 (Pollution) and NE8 (Sustainable Drainage Systems) as proposed to be amended 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 loss 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 floorspace at Giffard Drive Surgery would directly impact on the 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.

## Impact on the character of the area

As existing the doctors' surgery occupies a two storey building which is generally larger than surrounding residential properties. 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 two storey. This, together with the single storey garage and gardens to front and rear, means that there is a feeling of space around the site. 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 elements. It appears this design has been chosen to minimise the bulk of the roof and reduce the impact of the extension in amenity terms. This is confirmed in the design and access statement which states that the design of the building has been chosen to reflect its use as a non-residential surgery and Whilst the existing building features some similarities to the residential pattern of windows in the surrounding area, the Giffard Drive frontage of the extension with its prominent single first floor window clearly asserts the non-residential nature of the development in its architectural approach.

The impact on adjoining residents

The closest residential property affected by the proposed extension is 72 Giffard Drive to the north and 8 Brabon Road to the east. The solar studies provided within the submitted design and access statement and the planning application feedback response are noted.

With regard to 8 Brabon Road, there has been no response to a letter and three visits in person seeking to enter the property to assess the proposal. No response has been received to date. The impact on 8 Brabon Road has therefore been assessed from 70 Giffard Drive and the Brabon Road/Giffard Drive street. No 8 is a semi-detached house with detached garage to the east of the application site. The proposed first floor element extends further down the common boundary and the overall footprint is larger than that approved in 2004. The height, width, massing and proximity of the proposed extension are considered likely to have a significant impact in terms of enclosure and loss of light. The proposal is considered unacceptable in this respect. An additional window proposed in the first floor east elevation would directly overlook the rear garden of 8 Brabon Road. 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 obscurely 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 achieved. 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 over 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 as part of the consideration of the previous application and a card left for a visit to be arranged. No response was received to this request. The occupiers of this property were written to with a view to visiting their property to assess the current proposal. No response has been received to date. The impact has been assessed from 70 Giffard Drive and the Brabon This property is one half of a pair of semi-detached Road/Giffard Drive street scenes. houses to the north of the application site. The proposed first floor element would be closer to this property and the overall footprint larger 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 justify refusal of permission on this ground. However the proposal is considered to result in significant enclosure and loss of light to the house and rear garden of 72 Giffard Drive and a general loss of outlook. The proposed extension would stand forward of 72 Giffard Drive by some 1.3 metres. Whilst this will change the building relationships between the two buildings, this in itself 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 obscurely 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 objectors 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 Flood Risk Assessment and a SUDs statement. 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. In this case the existing and proposed finished floor levels are 560mm above the recorded flood level published by the Environment Agency which are considered to be acceptable.

With regard to SUDS, it is noted that infiltration is not appropriate on this site due to the high water table. Given this, flow balancing methods are proposed which include the use of a tanked permeable paving for attenuation storage with discharge restricted to 5.5l/s for all storm events including an allowance for climate change. In the event that planning permission were to be granted appropriate conditions may be imposed which may secure an acceptable drainage solution on this site. On this basis no objection is raised to the proposal in this regard.

Highway considerations

The application is supported by a transport statement, a travel plan and a Blunden Hall car park technical note.

The planning agent has confirmed that:

"the proposed extension is primarily required 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. When the 2004 application was approved the patient list in 2004 was 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. However it is noted that, as the planning support statement sets out, the practice cannot limit or cap patient numbers as it is required to accept all patients from within its catchment area. Increased demand results from local population growth, mainly from new housing developments within the catchment area.

It is therefore unclear what level of patient growth can be expected, and reference to an increase of about 300 patients per annum over the next few years which appeared in the withdrawn application does not appear in the current proposal. Given the circumstances set out above, a condition seeking to limit patient numbers would not actually be enforceable, however the reason for this being sought in 2004 was '..in the interests of highway safety.'

The car parking standard for health establishments is based on the number of consulting rooms rather than levels of usage of a particular room. 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 has made 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.

These standards require the provision of 3 parking spaces per consulting room. The increase of 4 consulting rooms would require an increase in 12 parking spaces.

The proposed level of car parking is 6 spaces below the standards indicated in the SPD. Reference is made to the use of Blunden Hall car park with car park surveys carried out suggesting sufficient space is available. It is noted that the car park is free and public, however it is not considered likely that patients would drive to the car park as opposed to seeking to park on-street. Using Blunden Hall car park to make up a deficit in available on-site parking for staff would be acceptable in principle. However this would need to be agreed with Rushmoor Borough Council as the land owner and secured in perpetuity to constitute a material consideration in determining the application.

The submitted technical note provides information on surveys undertaken between

September and November 2018 in relation to the levels of use of the Blunden Hall car park. These surveys were undertaken at 10 minute intervals between the hours of 0730-2000 Monday to Sunday for a period of 27 days. The surveys demonstrate that there is spare capacity within the Blunden Hall car park of 8 spaces which could be identified for use by surgery staff. At time of writing no formal arrangement has been concluded with the Council as landowner to secure exclusive use of these spaces by the surgery in perpetuity. However the applicants have offered to complete a section 106 unilateral undertaking, which would provide that, in the event that planning permission were to be granted. This would preclude implementation of the development until a separate contract/agreement for the provision of offsite parking was in place. This would mean that the surgery would have access to a total of 26 spaces. The County Highway Authority would be satisfied with this level of provision.

In the absence of an appropriate agreement being in place HCC highways raise a holding objection to the proposal in this regard. Reference is also made to the use of public parking locations some distance from the surgery. In the absence of specific details it is unclear whether this would be a practical solution or whether there would be spare capacity to accommodate additional parking. Limited weight can therefore be given to this suggestion. Implicitly, were the development to proceed without an arrangement to secure satisfactory parking provision, the result would be additional parking demand on the surrounding streets with the potential to interrupt the free flow of traffic to the detriment of highway safety.

The car parking spaces from Giffard Drive meet the minimum requirements of 4.8 metres by 2.4 metres. All spaces abutted against structures are required to have a 0.3 metre step-out to allow adequate space for users to exit their vehicles.

The car parking area from Brabon Road contains spaces that are below standard width. It is noted however that the aisle width is wider than the minimum standard, which allows greater manoeuvrability within the site.

Whilst the site is expected to generate additional trips, the nature of these trips would lend to a high percentage on linked trips and pass by trips. Notwithstanding this, the development will be funded by the public sector and therefore no developer contributions towards mitigating the impact on the local road network will be sought.

The Travel Plan (TP) aims to reduce the level private car use. The Travel Planning team at Hampshire County Council (HCC) have confirmed that it does not meet the minimum standards set out in HCC's "A guide to development related travel plans. Whilst it would be possible to revise the travel plan and secure its implementation by way of condition/legal agreement the submitted information is not acceptable and on this basis the County Highway Authority raise a holding objection in relation to the 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.

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, principally arising from the effect of the height, bulk and site

coverage of the proposed building in relation to neighbouring property, is considered to be so significant that, a recommendation for refusal is the appropriate response.

## **Full Recommendation**

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

- In the absence of any confirmed arrangement to provide additional off-site car parking facilities in perpetuity, the development is unacceptable in highway terms in that inadequate car parking provision is provided. 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.
- 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, outlook, sense of enclosure and overbearing impact on neighbouring residential properties at 72 Giffard Drive and 8 Brabon Road. The proposal therefore conflicts with policy 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.

#### **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 preapplication 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.















