

# **AECC University College, Garnet Campus, Bournemouth**

Demolition of existing sports hall and erection of an integrated  
rehabilitation facility

## **PLANNING STATEMENT, INCORPORATING FLOOD RISK AND DRAINAGE**

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## 1. Introduction

1.1 This statement has been prepared on behalf of AECC University College (the applicant) and is submitted in support of a planning application for the '*demolition of existing sports hall and erection of an integrated rehabilitation facility*' at AECC University College, Garnet Campus, Parkwood Road, Bournemouth, BH5 2BH (the site).

1.2 This statement shows how the proposal addresses the provisions of development plan policies and relevant national and local material considerations.

1.3 The application comprises:

- Completed application forms.
- Completed ownership certificates.
- Plans and drawings, including:
  - 001 location and block plans
  - 01A existing ground floor
  - 02A existing first floor
  - 03A existing second floor
  - 13E proposed elevations 1
  - 14E proposed ground floor
  - 15E proposed first floor
  - 16G proposed site plan
  - 17A typical sections
  - 18B street scene
  - 19B proposed elevations 2
  - Existing elevations

1.4 The application is accompanied by:

- Arboricultural report
- Drainage report
- Design and access statement
- Ecological report
- Flood risk and drainage (incorporated into this statement)
- Heritage statement
- Transport statement

## 2. The application site and surrounds

2.1 The application site is part of the vacant St Thomas Garnet School campus on Parkwood Road. This is a large site with a core of buildings adjacent to school playing fields to the north. Residential properties are situated to the north, south and east, while the AECC university campus is located just across Parkwood Road to the west.

- 2.2 Buildings along Parkwood Road are predominantly Victorian, while those along Harvey Road and Colville Close are a mixture of Victorian and post war. Properties tend to be two storeys in height, although the AECC university college building is a large, three-storey building opposite the application site.
- 2.3 The application site comprises a two-storey building, predominantly finished in painted brick and render. The frontage along Parkwood Road shows three distinct sections to the building: what is likely to be the earliest part of the building, which features a mixture of a hipped roof and front gable; a central addition with a hipped roof that continues the palette of materials on the earliest part of the building; and a 1.5 storey, flat-roofed sports hall, finished in blue. This element is notably in contrast to the rest of the building, not only in colour and texture, but also in terms of its overtly different design. The result is a rather unsuccessful and jarring feature of the building that appears at odds in the street scene.
- 2.4 The site is unencumbered by flooding constraints, except for a small patch at low risk of surface water flooding to the rear. A number of trees are situated on the site boundaries and are protected by virtue of a tree preservation order ref. 560/2001. The main AECC campus building and the Roman Catholic church opposite are both grade II listed. The former school grounds are covered by saved Policy 7.19 of the Bournemouth District-wide Local Plan (2002).

### 3. Relevant planning history

- 3.1 Online records show various applications to alter and extend the school buildings since 1992. Of particular relevance are:
- 7-1992-03244-C: *'alterations and single storey extension to school. This application affects the setting of a Listed Building'* approved. Unfortunately, no documents are available online to view.
  - 7-1993-03244-D: *'alterations to elevations & erection of storage shed to Nursery School'* approved. Unfortunately, no documents are available online to view.
  - 7-1994-03244-F: *'alterations and single storey extension to school'* approved. Unfortunately, no documents are available online to view.
  - 7-1995-03244-H: *'alterations to elevation of school and erection of a shed'* approved. Unfortunately, no documents are available online to view.
  - 7-1995-03244-I: *'alterations and single storey extensions to school'* approved. Unfortunately, no documents are available online to view.
  - 7-1995-03244-J: *'alterations and single storey extension to school to enclose gas meter'* approved. Unfortunately, no documents are available online to view.
  - 7-2000-03244-L: *'alterations and single storey extension to school'* approved. Unfortunately, no documents are available online to view.
  - 7-2007-3244-N: *'erection of a two storey extension'* approved. Online records show that this relates to the existing toilets and IT suite.

3.2 Regrettably, because the majority of the site's planning history is unavailable to view online, it is not possible to ascertain which of the above approvals were implemented and when the part of the building forming the subject of this application was constructed. Nevertheless, the history does tell a story in terms of the Council's willingness to allow the building to be adapted to meet changing needs.

## 4. The proposed development

4.1 The application seeks full planning permission to demolish the existing sports hall and erect a two-storey replacement to serve as an integrated rehabilitation facility. The facility would include 9 private consultation rooms; a reception/waiting area; and an open-plan rehabilitation clinical area to the rear.

4.2 AECC has been operating in Bournemouth since 1965 and was the first chiropractic college in Europe. Its success has been built on being leaders in musculoskeletal health and wellbeing and its expertise spans areas in chiropractic, physiotherapy; psychology; sports, exercise and health science; radiology and imaging sciences. The proposed development would enable the organisation to increase its delivery of these vital services by around 14,500 additional patients per annum, as well as lead to economic growth through the provision of an additional 15 permanent jobs. The integrated rehabilitation facility would treat athletes, as well as provide training.

4.3 The loss of the existing sports hall and its replacement with this high-quality scheme would see an improvement in the street scene and the setting of neighbouring heritage assets. Gone would be the incongruous flat roof and instead would be an addition that respects the eaves/ridge heights of the rest of the building. The brick and render elements are an obvious nod towards the retained building, but this addition would nevertheless be viewed as a standalone element. Enough similarities would make it coherent, at the same time as achieving an excellent balance that breathes fresh life into the site through vertical timber cladding and a green roof, for example.

4.4 The scheme has also been carefully conceived to maintain a good relationship with neighbouring properties and respect the welfare of protected trees.

4.5 A street scene excerpt is provided in figure 1 below.



Figure 1: front elevation excerpt, courtesy of The Quorum Partnership

## 5. Planning policy context

### National Planning Policy Framework and Planning Practice Guidance

5.1 The National Planning Policy Framework (NPPF) sets out that the purpose of the planning system is to contribute to the achievement of sustainable development, defined as encompassing economic, social and environmental dimensions:

- An **economic** objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
- A **social** objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
- An **environmental** objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

5.2 At the heart of the NPPF is a presumption in favour of sustainable development. Paragraph 11 explains that for decision-taking this means:

- *'approving development proposals that accord with the development plan without delay; or*
- *where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:*
  - *the application of policies in the Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
  - *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole'.*

5.3 Paragraph 9 confirms that *'decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area'.*

5.4 Paragraph 38 requires councils to *'approach decisions on proposed development in a positive and creative way... and work proactively with applicants to secure development that will improve the economic, social and environmental conditions of the area. Decision makers at every level should seek to approve applications for sustainable development where possible'.*

- 5.5 Paragraph 80 of the NPPF demonstrates the government’s commitment to securing economic growth through the planning system in order to create jobs and prosperity, stating that *‘decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development’*. Paragraph 81 recognises the need for flexibility when it comes to seizing opportunities for economic growth, requiring councils to *‘be flexible enough to accommodate needs not anticipated in the plan... and enable a rapid response to changes in economic circumstances’*.
- 5.6 Paragraph 103 supports sustainable transport, stating that *‘significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes’*.
- 5.7 The NPPF makes clear that planning decisions should promote an effective use of land, encouraging multiple benefits, where possible. Development should make *‘as much use as possible of... brownfield land’* (paragraph 117).
- 5.8 Paragraph 124 places great importance of good design, which is a key aspect of sustainable development. Paragraph 127 sets out that decisions should ensure developments:
- *‘Will function well and add to the overall quality of the area;*
  - *Are visually attractive;*
  - *Are sympathetic to local character and history, while not preventing or discouraging appropriate innovation or change;*
  - *Establish or maintain a strong sense of place;*
  - *Optimise the potential of the site; and*
  - *Create places that are safe, inclusive and accessible’.*
- 5.9 Paragraph 130 goes on to state that *‘permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions, taking into account any local design standards or style guides in plans or supplementary planning documents. Conversely, where the design of a development accords with clear expectations in plan policies, design should not be used by the decision maker as a valid reason to object to development’*.
- 5.10 Planning Practice Guidance (PPG) provides further context on design principles<sup>1</sup>, confirming that the National Design Guide<sup>2</sup> sets out the characteristics of well-designed places and demonstrates what good design means in practice. The following sections of the guide are relevant to this application:
- Context – enhances the surroundings.
  - Identity – attractive and distinctive.

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<sup>1</sup> Ref ID: 26-001-20191001

<sup>2</sup> <https://www.gov.uk/government/publications/national-design-guide>

- Built form – a coherent pattern of development.
- Movement – accessible and easy to move around.
- Nature – enhanced and optimised.
- Homes and buildings – functional, healthy and sustainable.
- Resources – efficient and resilient.
- Lifespan – made to last.

5.11 The picture excerpt below in figure 2 illustrates how the different design principles interact.



Figure 2: National Design Guide excerpt

5.12 The guide confirms at paragraph 21 how:

*'a well-designed place is unlikely to be achieved by focusing only on the appearance, materials and detailing of buildings. It comes about through making the right choices at all levels including:...*

- **Layout:** how routes and blocks of development are arranged and relate to one another... it defines the structure or settlement pattern; the grain; and the broad distribution of different uses and their densities or building heights.
- **Form:** the three-dimensional shape and modelling of buildings and the spaces they define, including size and shape; height; bulk (volume); and massing (how the bulk is shaped into a form).

- **Scale:** the height, width and length of a building in relation to its surroundings. It relates both to the overall size and massing of individual buildings and spaces in relation to their surroundings.
- **Appearance:** the aspects of a building or space within the development which determine the visual impression the building or space makes. This includes the external built form of the development, its architecture, materials, decoration, lighting, colour and texture. In the case of a space, its landscape also influences its appearance.
- **Landscape:** the treatment of land (other than buildings) for the purpose of enhancing or protecting the amenities of the site, the area in which it is situated and the natural environment. It includes landform and drainage, hard landscape such as surfacing, boundary treatments, street furniture and play equipment. It also includes soft landscape in terms of trees, shrubs and other planting.
- **Materials:** the scale, form and appearance of a building influence what materials may be appropriate for its construction. Materials should be practical, durable, affordable and attractive.
- **Detailing:** the individual components and how they are put together.

### Development Plan

5.13 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the adopted Development Plan unless material considerations indicate otherwise. In this instance, the Development Plan comprises:

- Saved policies of the District-wide Local Plan (2002); and
- Bournemouth Core Strategy (2012).

### Saved policies of the District-wide Local Plan

5.14 A review of the saved policies shows that only Policy 7.19 is relevant to this application. This policy seeks to safeguard against the loss of school playing fields, unless one of four circumstances applies. These include:

- An assessment of current and future needs to demonstrate an excess in provision and the site has no special significance in the interests of sport; or
- The proposal is ancillary to the playing field use; or
- An equivalent or better replacement is proposed in a suitable location; or
- The development would provide a sports facility, which would be of sufficient benefit to the development of sport and would outweigh the loss.

### Bournemouth Core Strategy

5.15 The plan's strategic objectives include:

- Ensure that the quality of the built environment is high and that the necessary physical and social infrastructure are provided to support current needs and future growth and development.
- Encourage the economy to be healthy and provide a range of well paid employment opportunities.
- Encourage sustainable development by the use of sustainable construction and drainage methods and the increased use of renewable and low carbon energy sources.

5.16 Policy CS1 (Presumption in Favour of Sustainable Development) echoes the NPPF's presumption in favour. It confirms how the Council will take a positive approach to development proposals by working proactively to find solutions to approve proposals wherever possible and secure development that improves the economic, social and environmental conditions in the area.

5.17 Policy CS4 (Surface Water Flooding) requires new development to incorporate appropriate SuDS.

5.18 Policy CS5 (Promoting a Healthy Community) says that the Council will ensure that the health of the community is promoted.

5.19 Policy CS6 (Delivering Sustainable Communities) states that the Council will work to ensure that local neighbourhoods are improved and enhanced to provide access to services.

5.20 Policy CS31 (Recreation, Play and Sports) says that planning permission will be refused for development that would result in the loss of public and private open space, including sports grounds that contribute to the recreational, visual, ecological or environmental value of an area or contribute to a network of green infrastructure. An exception is where it is demonstrated to be underused and surplus to requirements and the benefits arising from development outweigh the loss of the space.

5.21 Policy CS39 (Designated Heritage Assets) seeks to protect the setting of designated heritage assets from harm, requiring an assessment of the asset in question and the impact of the proposal.

5.22 Policy CS41 (Quality Design) expands on the requirement for development to be well designed and of high quality. It must respect the site and its surroundings and there should be enhancements to character and local distinctiveness, as well as residential amenity.

### **Sport England Playing Fields Policy and Guidance (2018)**

5.23 Sport England is a consultee in the planning application process and it has produced guidance<sup>3</sup> specifically on the loss of playing fields. The guidance says that the body will object to the loss of any part of a playing field, subject to five exceptions, one of which is:

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<sup>3</sup> <https://sportengland-production-files.s3.eu-west-2.amazonaws.com/s3fs-public/final-playing-fields-policy-and-guidance-document.pdf?WXTZnJYKUhHkAsLNfBEgtdwW1i5ndMBD>

*'EXCEPTION 5 The proposed development is for an indoor or outdoor facility for sport, the provision of which would be of sufficient benefit to the development of sport as to outweigh the detriment caused by the loss, or prejudice to the use, of the area of playing field'.*

- 5.24 Paragraph 74 of the supporting text goes on to clarify what Sport England means by a 'benefit to sport', including whether the facility *'fully secures sport-related benefits for the local community'* and *'improves the delivery of sport and physical education on school sites'*.

## 6. Consideration of the proposal

### Principle of development, including the loss of playing fields

- 6.1 The established use of the AECC is a mixed use of F1(provision of non-residential education) and E (Health Care) – having formally been use class D1. It is also important to stress that the playing fields have never been publicly available, having been used in conjunction with a private school.
- 6.2 The site in its entirety (including the existing buildings) is covered by saved policy 7.19 of the 2002 local plan, which safeguards against the loss of playing fields. Exceptions are subject to a number of circumstances, two of which include the proposal being ancillary to the playing field use; or if the development would provide a sports facility that which would be of sufficient benefit to the development of sport and would outweigh the loss.
- 6.3 It is important to recognise that the proposed development is intrinsically linked to sport. AECC is an internationally-renowned specialist in musculoskeletal health and wellbeing, directly connected to sports-related physiotherapy, exercise and health science. It is no exaggeration to say that significant numbers of people who enjoy sport would be unable to perform without the training, research and treatments provided by AECC over the past 55 years. Indeed, the proposed development is not just to facilitate additional education opportunities, but it would treat athletes.
- 6.4 Therefore, in light of policy 7.19's criteria, it is fair to say that the proposed development is ancillary to the use of the playing fields. Whilst it would result in a small reduction in the size of the playing fields, a significant quantum of space would remain for use by the establishment. Furthermore, although the proposed development is not a sports facility per se, Sport England's guidance specifically clarifies that development can be acceptable if it is of benefit to the development of sport. This can include *'sport-related benefits for the local community'* and *'the delivery of sport and physical education on school sites'*. It is clear that the development is sport-related and would be of benefit to the local community in terms of local education and integrated treatment opportunities; and it would benefit the delivery of sport and physical education as part of the AECC campus.
- 6.5 Paragraph 97 of the NPPF also refers to safeguarding against the loss of playing fields. However, it is important to note that paragraph 96 talks about the need for planning policies to be *'based on robust and up-to-date assessments of the need for open space, sport and*

*recreation facilities (including quantitative or qualitative deficits or surpluses)*'. Given that saved Policy 7.19 and its evidence is now approaching its 20<sup>th</sup> anniversary, it is fair to say that the policy is not supported by any robust or up-to-date analysis of need. Indeed, the fact that the site has been purchased by an education provider that does not need the playing fields in their entirety strongly suggests that they are surplus to requirements.

- 6.6 Lastly, Policy CS31 of the Core Strategy seeks to safeguard against the loss of sports pitches, except where they are demonstrated to be underused and surplus to requirements and the benefits arising from development outweigh the loss of the space. Again, given that an education provider has no need for the pitches in their entirety, this firmly points towards them being surplus to requirements. But moreover, it is very clear that significant benefits would arise from the proposed development that would outweigh any loss. These include social benefits from increasing student numbers and the treatment of around 14,500 additional patients per year, as well as the economic benefits from creating 15 new permanent jobs. Environmental benefits would also arise in terms of the environmental performance of the building, while the removal of the existing sports hall and its replacement with a much more attractive building would better respect the setting of nearby designated heritage assets. The development would also make an effective use of (part brownfield) land.
- 6.7 Given this context and the unique circumstances of the case, it is considered that the loss of part of the playing fields would not conflict with saved Policy 7.19, paragraph 97 of the NPPF, nor Policy CS31. The development is therefore acceptable in principle.

#### **Appearance and scale**

- 6.8 The Google street view excerpt in figure 3 below shows the appearance of the existing sports hall at the site. As can be seen, the existing building is markedly in contrast to the rest of the buildings on campus. Its flat roof and blue render are incongruous in the street scene and do little to respect the setting of the designated heritage assets opposite.



**Figure 3: Google street view excerpt showing the existing sports hall building**

6.9 Figure 4 below provides an excerpt of the proposed front elevation of the development. It shows how the proposal would respect the eaves/ridge heights of the rest of the building and its scale is wholly commensurate.



**Figure 4: front elevation excerpt, courtesy of The Quorum Partnership**

6.10 Meanwhile, the brick and render elements would complement the materials of the retained building and the glazed entrance would provide a legible sense of arrival. The curved, timber-clad element behind would give additional visual interest, while the inset top floor would add depth to the building and reduce its perceptible mass. The new main entrance to the building to the south would also be legible and would achieve a good balance between signaling an arrival at the building, at the same time as appearing a well-proportioned and subservient addition.

6.11 As can be seen in the site plan excerpt in figure 5 below, the extension would project no further forward than the existing sports hall and when viewed from the street, it would appear much narrower.



Figure 5: proposed site plan excerpt, courtesy of The Quorum Partnership

6.12 The result is a high-quality scheme that achieves an excellent balance where it would have enough similarities with the existing building to allow it to appear coherent, while at the same time being a standalone addition that enhances the character and appearance of the locality.

### Neighbour amenity

6.13 Residential properties are situated to the north and east of the proposed development. Taking the relationship with 8-13 Colville Close to the north first, a wall-to-wall distance of c.36m would separate the development from these neighbouring properties, which is ample distance to negate any risk of harmful overlooking. Furthermore, it is important to recognise

the nature of the proposal and the fact that the treatment rooms would be operational during working hours, rather than 24/7.

- 6.14 Similarly, the distance of c.21m to the wall of flats 1-10 at 2 Harvey Road is sufficient in this urban environment. Again, coupled with the use of the building, a comfortable relationship would subsist.
- 6.15 No.24 Parkwood Road is the closest residential property to the application site and it has first-floor windows in its southern elevation. It is important to recognise that the existing building will already have a perceptible presence in the outlook of this neighbour, including six high-level windows. The proposed development has been designed with the amenity of the neighbour in mind, with the first-floor windows angled to have an outlook towards the northeast and therefore avoid any window-to-window relationships. It is also important to bear in mind that the extension has been designed so its roof would be at an oblique angle away from No.24, plus it would be set further back from the boundary than the existing building. Given these factors, a comfortable relationship with this neighbour would continue.

#### **Biodiversity and trees**

- 6.16 This application is supported by technical reports showing that the proposed development can be accommodated without detriment to biodiversity or retained trees. As can be seen from the submitted arboricultural report, tree T24 is scheduled for removal as part of the proposed works; however, it is important to recognise the significant amount of replanting and wider landscaping works proposed, which more than compensate for the loss of this tree.
- 6.17 In addition to the proposed replacement planting to compensate for the felling of T24 it is important to understand the compromised value of the Oak Tree (T24). As referenced in the accompanying Arboricultural Statement T24 is located within the existing hard surfaced playground to the south of the main building. Its canopy has been subject to significant past reduction management over the years and this has resulted in a tree of limited canopy width and volume which has a diminishing influence on its prominence within the locality. Furthermore, its visual levels of vitality and health are low, with areas of dieback and decline evident within its upper canopy extents. The impact of the removal of this tree from the immediate locality will be screened from surrounding public vantages by the retention of trees T4, T10, T12, T13, T19, T25, T26 and group G23 and as such it is not considered that there will be a significant alteration to the appearance or character of the site – these considerations strongly support the removal of tree.

#### **Parking and access**

- 6.18 The site forms part of the wider AECC campus, where plenty of existing parking is available. Nevertheless, the submitted site plan shows how the existing hard standing to the south, previously used for outdoor play, is proposed to serve as ancillary parking. An additional access via Harvey Road is also proposed. The submitted transport statement shows that the level of parking accords with the adopted parking standards and is sufficient to serve the

development, plus the new access would lead to no highway safety implications. The level of proposed cycle parking exceeds that required by the Council's adopted standards.

- 6.19 It is also worth noting that the level of traffic entering the site would be considerably less than the extant primary school use, leading to a betterment in terms of traffic volumes.

## 7. Flood risk and drainage

- 7.1 The EA flood map for planning shows the site is situated within flood zone 1 and therefore at the lowest probability of fluvial flood risk. An area within the east of the application site is at low risk of surface water flooding, but as shown in the submitted technical report on drainage, the development can be accommodated successfully without detriment to surface water drainage.

## 8. Conclusion

- 8.1 This statement has been prepared on behalf of AECC University College (the applicant) and is submitted in support of a planning application for the '*demolition of existing sports hall and erection of an integrated rehabilitation facility*' at AECC University College, Garnet Campus, Parkwood Road, Bournemouth, BH5 2BH.
- 8.2 The proposal presents a sustainable form of development, contributing to the economic, social and environmental wellbeing of Bournemouth:
- The proposed development would make more efficient use of brownfield, urban land;
  - The development would lead to significant social gains in terms of education and the treatment of patients;
  - Significant economic benefits would also arise from employment provision;
  - Environmental benefits would arise in terms of the energy efficiency of the building, while removal of the existing sports hall and its replacement with a much more attractive building would better respect the setting of nearby designated heritage assets;
  - The design and finish are appropriate to the locality; and
  - The design has been carefully conceived to avoid harm to neighbour amenity and ensure that a comfortable relationship subsists.
- 8.3 This statement serves to demonstrate how the proposal complies with policies set out within the Development Plan, as well as relevant national and local material considerations. The proposal would actively contribute towards the realisation of the following spatial objectives:
- Ensure that the quality of the built environment is high and that the necessary physical and social infrastructure are provided to support current needs and future growth and development.
  - Encourage the economy to be healthy and provide a range of well paid employment opportunities.

- Encourage sustainable development by the use of sustainable construction and drainage methods and the increased use of renewable and low carbon energy sources.

8.4 For the reasons set out above, the applicant respectfully requests that this application be determined favourably.