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SOCG 04

Statement of Common Ground between
BCP Council and AFC Bournemouth
(0257)

BCP Local Plan Examination

14 November 2024

1. General

- 1.1 The Council has prepared this Statement of Common Ground (SOCG) to assist the Inspector at the BCP Local Plan Examination.
- 1.2 AFC Bournemouth 's response to the public consultation on the Draft BCP Local Plan (March 2024) identified some issues with the Draft Local Plan . The purpose of this SOCG is to set out the agreed position between BCP Council and (representor id 0257).
- 1.3

2. Declaration

Name	Organisation	Signature	Date
Julie Allington Senior Planning Policy Officer	BCP Council		03/12/2024
Chris Gerrish Operations Director	AFC Bournemouth		16/12/2024

3. Agreed position

- 1.4 The summarised comments, officer response and agreed position is set out in the table below.
- 1.5 Boxes highlighted green are agreed positions, orange boxes are not yet agreed. Red text denotes possible modifications to text.

Plan Ref	AFCB Full response and suggested modification	BCP Summarised response	Supp/Object	BCP Officer response	AFC Bournemouth Position
NE7	AFCB supports NE7 in so far that AFCB's training ground pitches and the athletics stadium and associated running track are not shown within the Open Space designation on the proposal map. This will provide flexibility for AFCB should the preferred option be to deliver a new stadium on the site of the training pitches and athletics track. However, it disagrees with the requirement under NE7.2.b. for new development to "provide publicly accessible open space in accordance with site-specific allocations or BCP's Open Space Standards" . In the context of enhanced stadium facilities in Kings Park, it may not be appropriate or feasible for a new stadium to provide publicly accessible open space and this requirement could negatively impact delivery. We are concerned that as drafted this policy risks failing the NPPF tests of 'soundness' (para. 35) because it is not 'justified' (an appropriate strategy response taking account of potential alternatives) or 'effective' (deliverable).	Disagrees with the requirement under NE7.2.b. for new development to "provide publicly accessible open space in accordance with site-specific allocations or BCP's Open Space Standards" as would not be appropriate for new stadium.	Objection	Agree, the policy as worded suggests all development must provide publicly accessible open space. This criterion should be amended to make it clear that it relates to residential development. Action: Amend Policy NE7 2(b) to: Where residential accommodation is proposed , provide new publicly accessible open space in accordance with specific site allocations or BCP's Open Space Standards; and	Agree to the change proposed
NE4	AFCB supports NE4 in so far that the training ground pitches and athletics stadium and associated running track are not shown within an Existing Ecological Network on the proposal maps. This will provide future flexibility for AFCB to deliver a new stadium in this area, whilst having regard to the function and integrity of the ecological network located on adjacent land. However, it is concerned that the associated athletics field to the east of the track remains within the Existing Ecological Network. This space comprises athletics infrastructure, such as a shot-put cage, and it is well-maintained sports pitches. It is likely to be of limited ecological value. If this area remains within the Ecological Network designation there is a risk that it could restrict the ability to deliver enhanced stadium facilities as set out under policy P11f). We are concerned that NE4 as drafted risks failing the NPPF tests of 'soundness' (para. 35) because it is not 'justified' (an appropriate strategy response taking account of potential alternatives) or 'effective' (deliverable).	Support that training ground pitches and athletics stadium and associated running track are not shown within an Existing Ecological Network on the proposal maps. Concerned that the athletics field to the east of the track remains within the Existing Ecological Network, likely to be of limited ecological value. Could restrict ability to deliver new stadium facilities	Objection	A review of the Ecological Network mapping will be carried out and informed by the Local Nature Recovery Strategy through the Examination process. The draft LNRS is expected to be published in early 2025.	Objection maintained pending review of the Local Nature Recovery Strategy. AFCB reserve the right to make further comments in due course.

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	AFCB's soundness objection can be overcome by realigning the Existing Ecological Network designation so that it excludes this area.				
NE6	AFCB is concerned by NE6 is so far that the proposal map shows the Stour Valley River Corridor crossing the north east part of the AFCB training ground facility at Canford Magna	Concerned the proposal map shows the Stour Valley River Corridor crossing the north east part of the AFCB training ground facility at Canford Magna. The training ground is a private facility which is not accessible to the public		Agree mapping should be amended. Action: Amend indicative access path to Stour Valley River Project so that it does not cross the AFC Bournemouth training ground (change to mapping to be agreed through the Statement of Common Ground).	Agree to the change proposed
E12	Supporting paragraph 9.71 states <i>"We propose to protect existing community, sport and leisure facilities that play an important role in supporting the health and wellbeing of our communities. New community uses will generally be supported where the use has a clear benefit to the local community. <u>The most intensive sports and leisure facilities, which could include stadiums, ice rinks and leisure centres are considered by national planning policy as main town centre uses. These should be located in town centres, then in edge of centre locations and only if suitable sites are not available should out of centre sites be considered.</u> Where possible other community, sport and leisure facilities will also be encouraged to be located within or near to our town centres or within sustainable neighbourhoods to reduce trips."</i> [own emphasis added] The first part of Policy E12 address 'new community, sport and leisure facilities' and states: <i><u>"a. Intensive sports and leisure facilities are main town centre uses and should be located in town and district centres. Proposals which are located outside of a town or district centre will require a retail sequential test.</u></i> [own emphasis added] b. <i>Proposals for other sport, leisure and community facilities will be supported in town, district and local centres. Where it can be demonstrated that a lack of suitable sites within these areas, the applicant must demonstrate the proposed location is sustainable and can be easily accessed by walking, cycling and public transport. Consideration should be given to the shared use, or re-use, of existing buildings and sites."</i> While stadia are not specifically referenced as a 'more intensive sports and recreation use' in the NPPF Annex 2 Glossary section (although it is acknowledged that the NPPF definition does not necessary constitute a closed list), AFCB acknowledges that NPPF does direct 'town centre uses' to town centre location before sites in alternative locations are considered (i.e. edge of centre and then other accessible locations that are well connected to the town centre) (NPPF para. 90). However, it is concerned with the requirement for a 'retail sequential test' to be undertaken for sites located outside of a town or district centre. NPPF para. 91 states <i>"local planning authorities should apply a sequential test to planning applications for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan"</i> . AFCB questions whether reference to a 'retail sequential test' is an error and that E12a) should simply refer to a 'sequential test'. Notwithstanding this, the delivery of a new stadium in Kings Park would be in accordance with draft Policy P18 and therefore, when it comes to a future planning application, a sequential test may not actually be necessary. As a more general point, it is important the Local Plan supports the retention and future development of a football stadium in Kings Park. There are important transport dimensions to this: the stadium is accessible on foot or via a short bus or cycle ride from the two main railway stations (Bournemouth Central and Pokesdown) and regular bus service are available on local roads within easy walking distance (Christchurch Road, Ashley Road and Holdenhurst Road), providing connectivity to much of the conurbation.	Concerned with the requirement for a 'retail sequential test' to be undertaken for sites located outside of a town or district centre, question if reference to a 'retail sequential test' is an error and that E12a) should simply refer to a 'sequential test'. Important the Local Plan supports the retention and future development of a football stadium in Kings Park.	Objection	Agree the sequential test should be clearer and refer to Main Town Centre Uses which would include a new stadium, rather than retail. A new site for a stadium would need to undertake a sequential test. However if AFCB redevelops the current site Policy E12 2(a) does not require a sequential test. Action: Amend Policy E12 1(a) : Intensive sports and leisure facilities are main town centre uses and should be located in town and district centres. Proposals which are located outside of a town or district centre will require a main town centre uses retail -sequential test.	Agree to the change proposed

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	A football stadium in a fairly central location of an urban area enables supporters to radiate to and from the stadium on all points of the compass, optimising efficient crowd dispersal.				
P18	<p>AFCB supports the intent of P18f), in so far that it supports proposals to develop enhanced stadium capacity for AFCB Bournemouth in Kings Park. A masterplan approach is an appropriate way to plan for the future of the area. However, it proposes an amendment to the detailed wording of P18f) on the basis that it is not yet known whether enhanced stadium capacity can be achieved alongside the other requirements set out under P18f). It is also concerned that the requirement to reduce vehicle access could negatively impact on AFCB's operations at Kings Park.</p> <p>Subject to the land required for a new stadium and associated works, an option could be to relocate the athletics stadium to an alternative location outside of the park. While there are numerous stakeholders that would need to be engaged to test the desirability and feasibility of this, it is important that the site-specific policy does not preclude this from happening.</p> <p>AFCB has the smallest capacity stadium in the Premier League (only 11,329 seats) and this restricts the number of people able to watch matches and the revenue that the Club is able to generate on match days. A larger stadium is essential to provide more people with the opportunity to watch games and to facilitate the ambition of playing European football within the next five years.</p> <p>As currently worded we believe that P18f) does not meet the NPPF tests of 'soundness' because it is not 'justified' (an appropriate strategy response taking account of potential alternatives) and there is a risk that it is not 'effective' (deliverable).</p> <p>The policy could be made sound via the following amendments: <i>Kings Park, including the provision of a masterplan that considers enhanced stadium capacity for AFC Bournemouth, enhancement of Kings Park Athletics Centre or its re-provision in a suitable alternative location within BCP, improvements to the cricket pavilion, nature recovery opportunities, improve existing play areas and skate/wheeled facility, changing facilities, nursery improvements and reducing vehicle access managing car parking and access requirements, including promoting sustainable travel.</i></p>	<p>Support policy intent, suggest amendments. Seek enhanced stadium capacity at Kings Park. AFC Bournemouth, has lowest capacity stadium in Premier League. Athletic stadium could be relocated to alternative location - policy should not preclude this. All training moving to new facility. Club has many economic and community benefits. AFC Bournemouth makes a tangible contribution to LP objectives. Concerns about reduced vehicle access on operations.</p>	<p>Objection</p>	<p>There is no proposal to relocate the athletics stadium at this time. The policy wording is flexible to allow consideration of future uses within Kings Park through the master planning process.</p>	<p>Objection maintained. Wording should be as per AFCB's suggested amendments to provide future flexibility.</p>