



THE BOSMERE MEDICAL PRACTICE

Bosmere Medical Centre, Solent Road, Havant, Hampshire, PO9 1DQ
Tel 02392 476941

FAO Sophie Osborne
Transport Planner – Highways Development Planning
Hampshire County Council
The Castle
Winchester
Hampshire
SO23 8U
(By email)

8 April 2024

**Ref: Hampshire County Council Highways letter, dated 26 March 2024
Havant Borough Council Planning Application APP/22/00601**

Dear Ms. Osborne

I note the content of your letter to David Eaves at Havant Borough Council, dated 26 March 2024, with reference to the above planning application and in particular the transport documentation produced for that proposal by Mode Transport.

While you raise a number of points requiring clarification, you do not appear to acknowledge the fundamental concerns from the Havant community regarding Mode Transport's lack of consideration of the existing use made of the Solent Road junction by the Bosmere Medical Centre and the separate seven day out-of-hours pharmacy business which operates on the same site.

Both facilities have been present on the site since 2007 and benefit from the single dedicated point of site access to Solent Road for inbound and outbound traffic. This planning application proposes that the two healthcare facilities share this access road with commercial, industrial and commuter traffic, without having given any detailed consideration to the volume, frequency or urgency of traffic that currently uses this access.

Neither the Bosmere Medical Centre nor the separate Bosmere (formerly Boots) pharmacy operating on the same site have ever been formally approached about this application and the proposed changes.

The Bosmere Patient Participation Group (PPG) represents almost 20,000 local residents registered on the NHS patient list at the Bosmere Medical Centre. On multiple occasions throughout the four year history of this planning application we have attempted to gain local authority attention to our concern regarding the proposed change of use of the Solent Road access to this site. On each occasion, we have failed.

Dr T Chung Dr D König Dr S Schaeper Dr B Bracegirdle Dr E Mowlem Dr S Jadhan

APP/21/00601 – Concern raised by the Bosmere Medical Centre Patient Participation Group:

Our concern is that any proposal to open the Solent Road access to office, commercial and industrial traffic must take into account the nature, volume, frequency and urgency of the current use of this access for or related to NHS business. In particular, the applicant should be able to demonstrate that there is no increase in the level of risk to the health and well-being of patients and staff caused by the proposed changes.

APP/21/00601 – Bosmere Medical Centre context

The Bosmere Medical Centre and the co-located pharmacy occupy a strategic and readily-accessible position in the heart of Havant. The NHS facility is the largest GP practice in Havant, serving a growing residential population with significant new housing developments already in the plan for current and former Portsmouth Water landholdings within the catchment area. Your letter of 26 March acknowledges *‘the scale of the various developments within the area’* on Page 2 in your reference to APP/22/00669 at Kingscroft and other developments in the immediate area.

The Medical Centre is governed by its NHS contract which dictates the hours during which surgeries must be held and the schedule rules and timings within which appointments must be managed. The peak surgery hours necessarily coincide with the peak traffic times in the area and with sick, infirm and variously disabled patients of all age groups, the management of access, parking and taxi drop-off and collection is already challenging. Emergency access for ambulances and paramedic vehicles needs to be maintained at all times.

APP/21/00601 - Planning Application History

Our concern was first raised at the pre-planning stage, during the Development Consultation Forum (DCF) held on 22 October 2019 at the Havant Civic Plaza. The concern was detailed in a spoken deputation supported by a PowerPoint slide set, delivered on behalf of the medical practice by myself, representing both Havant Civic Society and the Bosmere Medical Centre Patient Participation Group, of which I am a member. The deputation materials were forwarded to Julia Mansi, Development & Building Control Manager, immediately following the meeting but despite follow-up, remained unacknowledged. When the documentation for ‘Forum 49’ was published on the HBC Planning Services DCF web page several months later, the material was not present.

Two further planning applications related to the site of the proposed buildings were then approved, APP/20/00839 on 22 October 2020 and APP/20/01109 on 5 November 2021. It was clear to the public that these planning applications formed part of an overall unpublished masterplan for the Portsmouth Water sites, laying the groundwork for the developer’s preferred approach to what became APP/21/00601.

Following publication of APP/21/00601 on 20 May 2021, it was clear that the concerns of the GP Practice raised at the DCF had been ignored. Within weeks of publication, over 600 public objections were recorded, the majority of which echoed the concern over the proposed shared use of the site access.

On 30 November 2021, following a request by St. Faith’s Ward Councillor Imogen Payter to the Planning Consultant, Natalie Fellows, a meeting involving TetraTech, Chancerygate and Portsmouth Water was arranged to discuss the proposal with representatives of the GP

practice at the Bosmere Medical Centre. The minutes of that meeting show that Councillor Payter was tasked with the action to raise the concern with the HBC Development & Building Control Manager. There is no evidence that this action ever occurred.

On 4 July 2023, APP/22/00601 was resubmitted, this time with a change of applicant from Chancerygate to Portsmouth Water and a modified geographic footprint. The intention to share the access remained unchanged, and the current dedicated access and use by the healthcare facilities remained unreferenced and undocumented.

Following publication of the revised planning application, further public objections were raised as comments by the public. While the text of these comments is publicly visible, the public access portal simply shows many of them simply as 'additions' to existing comments, despite the fact that the most recent comments had been raised against a fundamentally revised development proposal.

In your letter to the HBC Case Officer dated 26 March 2024, you include a number of points of clarification but imply under 'Bosmere Medical Centre Access' on page 5, that there are no outstanding issues relating to that part of the design. Once again, there is no reference to the missing analysis of access use by the Medical Centre.

APP/22/00601 - Transport documentation summary

There are currently 1,436 pages of documentation filed with APP/22/00601, with 1,394 pages authored by Mode Transport, 40 pages by Hampshire County Council Highways and two pages by National Highways.

Within that content, the word 'pedestrian' appears 281 times, 'cyclist' 67 times, even 'e-scoot' appears four times. The words 'GP' or 'doctor' are absent. 'OGV' appears 1,961 times and yet there is only one single mention of 'ambulance'.

The paragraph in which the word 'ambulance' appears is significant, demonstrating the Transport Consultant's uninformed and summary dismissal of '*any concerns raised by third-party consultees in relation to the ongoing operation of the Bosmere Medical Centre*'. Your letter to Planning Services, dated March 26 2024, appears to confirm your acceptance of this position.

The three significant sentences are transcribed here:

"Moreover, the access arrangement onto Solent Road, which will continue to be shared with the adjacent Bosmere Medical Centre, is shown to have significant spare capacity, including negligible queuing and delay. This evidence should respond to any concerns raised by third-party consultees in relation to the ongoing operation of the Bosmere Medical Centre. Importantly, this evidence demonstrates that with negligible queuing forecast, this will not hinder the convenient access in and out of the medical centre, including any very occasional ambulance access (should this indeed occur)."

The final phrase in parentheses is completely uninformed and frankly offensive to the team at the medical centre. In the first 12 weeks of this year, emergency calls have been made from the medical centre to the ambulance service on 10 separate occasions and this has been noted as '*a very light start to the year*'. The GP Partners and the Practice Manager confirm that ambulance calls occur on '*most days*', though would accept '*three calls a week*' to be an acceptable average for analysis. This is a far cry from the '*very occasional (should this indeed occur)*' assumption made by Mode Transport.

Existing Site Traffic Use

In addition to the frequent unscheduled emergency vehicle visits, the medical practice manages around 650 patient appointments each day, many of which concern patients in need of vehicular access, either self-driven or with family members, carers, or in taxis.

Apart from the commuting needs of upwards of 45 staff members at any one time, of approximately 90 on the payroll, the practice also receives on any one day, not limited to:

- Two deliveries of clinical supplies, paper-ware, medicines and pharmaceutical products each day
- Four pathology collections each day
- Various other courier deliveries and pick-ups daily
- Royal Mail collections
- Facilities maintenance and medical / IT equipment support staff.

Parking facilities are already stretched with traffic on the site road cul-de-sac often having to back up to allow access and egress. When the site was originally opened, overflow street parking had been available on Solent Road outside the practice, an option which has already been removed. There is now no such facility, leaving surgery visitors and the more mobile patients to use the privately-controlled, time-limited and at times heavily constrained local retail parking spaces.

Please note that the detail included in the paragraphs above does not include the traffic generation relating to the Bosmere Pharmacy, a commercial business unconnected with the medical practice.

Consideration of risk

There are twenty-two places in the documentation where risk is considered, but I note that these relate almost exclusively to the risk of collisions between vehicles, pedestrians and cyclists on the surrounding road network.

Since there has been no consideration of the type and volume of trip generation associated with activity at the Bosmere Medical Centre or the Pharmacy, there is no assessment of the type, likelihood or severity of risks to the health and well-being of NHS patients which may be associated with a change of the site access from a dedicated cul-de-sac into a through road with both commercial and industrial traffic.

In conclusion

At no time during the four year passage of this planning application through the local authority planning process have Hampshire County Council Highways, Havant Borough Council Planning Services or Mode Transport Planning directly engaged with the Bosmere Medical Centre. It is also highly likely that no such consultation has been carried out with the independent pharmacy business which shares the Solent Road access, despite its own provision of an important town centre seven-day and out-of-hours dispensing service.

The concern raised in this response is not new but has been the subject of several attempted interventions by the Bosmere Medical Centre Patient Participation Group on behalf of the practice staff since October 2019. The number of public objections stands at around 700.

It is difficult to understand how our concern has gone unrecognised for the past four years, a period during which the GP partners, doctors, nurses and administrative staff have had to cope with the additional stress associated with the worst healthcare crisis in living memory.

Could you please provide us with a clear explanation and justification for the exclusion of any analysis of the existing traffic generation at these healthcare facilities.

By copy to the HBC Executive Head of Place, on behalf of the GP Practitioners, the Practice Management, the staff and patients of the Bosmere Medical Centre, please would you reconsider the validity of this planning application until a complete and comprehensive Traffic Assessment is available and a thorough review has been undertaken of the alternative access arrangements possible within the current and former Portsmouth Water estate.



Robert Comlay

Bosmere Medical Practice - Patient Participation Group

For and on behalf of the staff and patients of Bosmere Medical Practice

cc:

Dr Ben Bracegirdle	Bosmere Medical Centre GP Partner
Dr Tommy Chung	Bosmere Medical Centre GP Partner
Dr Salam Jadhan	Bosmere Medical Centre GP Partner
Dr Dirk König	Bosmere Medical Centre GP Partner
Dr Elizabeth Mowlem	Bosmere Medical Centre GP Partner
Dr Shahnaz Schaeper	Bosmere Medical Centre GP Partner
Helen Pinder	Bosmere Medical Centre Practice Manager
Nalin Despard	Bosmere Medical Practice Patient Participation Group Chair
Alex Robinson	HBC Executive Head of Place
David Eaves	HBC Planning Services Case Officer
Councillor Gillian Harris	HBC St Faith's Ward Councillor
Councillor Phil Munday	HBC St Faith's Ward Councillor
Councillor Imogen Payter	HBC St Faith's Ward Councillor