[redacted]

9th October 2026

The Planning Officer
Planning Services
Havant Borough Council
Public Service Plaza
Civic Centre Road
Havant PO9 2AX

By email: planning.development@havant.gov.uk

Dear Planning Officer,

Objection – Planning Application APP/26/00615
Land North of Lavant Drive, Havant, PO9 2EU (Former Oak Park School)
Construction Of a Care Home (Class C2) With Access, Car Parking, Landscaping and Other Associated Works

We live at [redacted] and write to object to the above application. We do not object to the principle of care accommodation on this allocated site, and we recognise the need for care beds in the Borough. Our objection is that the application, as submitted, does not demonstrate that the development can be built and operated safely, and that the supporting information has significant gaps which the National Planning Policy Framework (NPPF, August 2026) requires to be resolved before a decision is made.

Preliminary matters – consultation and submitted plans

Short notice has been given of this application. It is very difficult to find on the Council's website, and no email address is given for the case officer.

Our neighbour notification letter was dated 25 September 2026 but was not received until 30 September. We had to telephone the Council for help to find the application, as the reference number given returned an error ("no page found"). The letter gives 19 October 2026 as the final date for objections, whereas the public notice, poorly displayed on a couple of lampposts, is dated 29 September 2026 and gives a consultation expiry date of 23 October 2026. We ask that all comments received up to 23 October are taken into account.

The submitted plans show a car park, which is very misleading, as they do not state that this is an NHS car park for staff and attendees at the Oak Park centre only.

1. The policy test

The applicant's Planning Statement relies on the presumption in favour of sustainable development under NPPF policies S3 and S4. Under S4(1), development within settlements should be approved unless the benefits would be substantially outweighed by adverse effects when assessed against the national decision-making policies. However, S4(2)(c) is explicit that benefits are likely to be substantially outweighed where a proposal fails to comply with one of the national decision-making policies which state that development proposals should be refused.

The most important of these here is TR6(4) (transport impacts, including during construction); DP3(3), which requires refusal of proposals that conflict with the Framework's design principles (including the maintenance of tree cover) without clear justification, is also engaged. The presumption therefore does not operate in the applicant's favour if either test is failed, regardless of the housing land supply position.

The site allocation itself (Policy H69 of the Havant Borough Local Plan (Allocations) 2014) requires access "to the satisfaction of the Highway Authority" and "a coordinated approach" to delivery of the allocation. Neither requirement is yet met.

2. Highway safety during construction – NPPF TR6(4)

NPPF TR6(4) states that development proposals should be refused if they would have a severe adverse impact on the transport network (including cumulative impacts) or an unacceptable impact on highway safety, and that "this applies both during the construction phase and following completion". This is a new and important change: construction impacts are now a matter to be judged at the point of decision, not left to a later condition.

The Transport Assessment (Haskoning, 20 August 2026) confirms (para 7.1.18) that all development traffic will be routed via Lavant Drive and Leigh Road. Leigh Road is therefore the only practical route for every construction vehicle, delivery, crane, concrete lorry and site worker for the duration of the build.

Leigh Road:

- was re-engineered around three years ago with designated cycle space and car barriers to keep the road safe for all users;
- carries National Cycle Network Route 22 (acknowledged at TA para 4.2.6) and forms part of the south coast cycle route;
- has a pavement on one side only, used by residents, schoolchildren and mobility scooter users, who are often forced into the carriageway;
- has no off-road parking for many residents, so the carriageway is already constrained by parked cars;
- is the pedestrian and vehicular route to Havant railway station, the Homewell practice, the Council offices, Horizon Leisure Centre, the NHS Oak Park Community Clinic and car park, the NHS Parkway Centre and car park, The Hollies NHS respite centre, and a day-care facility whose large purpose-built vehicles make drop-offs and pick-ups on the road twice daily;
- is used daily as a short cut to the Amazon distribution centre (which was not the Planners' original intention); and

- is lined with mature, overhanging trees, which restrict headroom for high-sided vehicles.

Despite this, the Transport Assessment contains no assessment of construction traffic at all – no vehicle numbers, vehicle sizes, routing, phasing, delivery hours, contractor parking, or abnormal loads. The Planning Statement simply proposes that a Construction Environmental Management Plan be secured by condition. That approach cannot satisfy TR6(4): the Council cannot conclude that construction would not have an unacceptable impact on highway safety without any evidence. NPPF DM6 also advises that conditions which must be discharged before development commences should be avoided unless there is clear justification; a pre-commencement condition should not be used to fill a gap in the evidence on a matter the Framework requires to be judged now.

We would also note that a 14-month railway-related scheme is planned on the road leading to Leigh Road, which will overlap with construction. The cumulative effect of these works, the existing Amazon traffic and the construction traffic has not been considered.

3. The Transport Assessment is not adequate – NPPF TR6(1)–(3)

TR6(1)(a) requires a transport assessment proportionate to the issues, and TR6(3) requires reasonable future scenarios to be considered when judging whether impacts are severe. The submitted TA falls short of this and of what the Council asked for at pre-application stage (letter of 31 July 2026, ref GEN/26/00320), which required assessment of local junctions "using industry standard capacity models" and identification of suitable mitigation:

- No junction capacity modelling has been undertaken for the Lavant Drive / Leigh Road junction, the New Road roundabout, or the Petersfield Road junctions.
- The collision review covers only a 200 m radius (TA para 3.4.1) and does not consider Leigh Road as the access route used by cyclists, pedestrians and vulnerable users. Even within that small area, it records a serious collision at the Petersfield Road / Crossland Drive junction.
- No cumulative or future-year scenario has been assessed. Policy H69 allocates the wider former school site for around 90 dwellings, extra care and community health uses, and the emerging Local Plan proposes a 90-bed care home and 21 homes; the remainder of the allocation is shown on the applicant's own illustrative masterplan. Traffic from that further development, which would use the same roads, has been ignored.
- The application form leaves the number of proposed employees blank, and no staffing levels or shift patterns are provided anywhere in the submission. The Council's Parking SPD specifically requires this information for nursing and rest homes. Without it, the trip generation and parking figures cannot be verified.
- The submission is internally inconsistent: the railway station is said to be 480 m away in the TA and Planning Statement para 2.3, but 800 m away in the Planning Statement's policy table; the BREEAM accessibility index is given as 3.90 in the Planning Statement but 7.14 in the TA.

4. Car parking provision – NPPF TR4(1)(e)

TR4(1)(e) requires a suitable number of parking spaces reflecting the location. The site is outside Havant town centre (as the TA accepts at para 5.4.5), yet the TA applies the lower town-centre standard to justify 27 spaces. Applying the Council's Parking SPD standard for nursing and rest homes outside the town centres (one space per four residents plus one space per member of staff on site), and the TA's own assumption of one member of staff per three residents at the daytime peak, the requirement would be in the order of 50 spaces – almost double what is proposed. The TA also concedes (para 6.4.2) that its parking accumulation figures do not account for shift changeovers, which is precisely when demand peaks.

The TA's fallback – that visitors could use the Civic Centre pay-and-display car park – is unrealistic for relatives visiting elderly residents, and in practice overspill will go onto Leigh Road and Lavant Drive, where residents already have no off-road parking and where NHS patients, ambulances and day-care vehicles need clear access. An 86-bed nursing and dementia home generates constant movements by staff on three shifts, visitors, GPs, district nurses, multi-disciplinary teams, minibuses, pharmacy and food deliveries, and emergency vehicles. We note that another respondent supporting the scheme has also asked for a minimum of 60 spaces.

This overspill will not be confined to Leigh Road. As a care home operates around the clock, there will be serious parking problems over a 24-hour period for residents of the following roads as well:

- Russell Road
- Havant Farm Close
- Old Copse Lane
- Lakeside Gardens
- Fern Drive
- Cedar Gardens

5. Safety of pedestrians, cyclists and vulnerable users – NPPF TR4(1)(a) and (c)

TR4(1)(a) requires priority first to walking, wheeling and cycling, and TR4(1)(c) requires routes that are safe, inclusive and attractive for all users. The proposal would add construction HGVs and, once operational, around 148 vehicle movements a day plus 20 servicing trips (TA Tables 6-1 and 6-2) to a road with a single footway, a national cycle route and heavy use by schoolchildren, elderly and disabled people, NHS patients and mobility scooter users. No improvements to Leigh Road – such as a continuous footway, crossing points or protection of the cycle facility – are proposed or assessed, and the draft Heads of Terms refer only to an unspecified "package of necessary highway works".

6. Impact on existing NHS and community services – NPPF P4(1)

P4(1) states that existing community facilities and public services should not have unreasonable restrictions placed on their operation by new development, and that development should be capable of being integrated effectively with them. Lavant Drive and Leigh Road are the access to the Oak Park Community Clinic, the Parkway Centre, The Hollies respite centre and the day-care facility, all of which depend on reliable access for patients, ambulances and specialist transport. The application does not assess how construction traffic, or operational traffic and overspill parking, would affect these services.

7. Living conditions, air quality and noise – NPPF P3

P3(2)(b) requires that development does not give rise to unacceptable levels of air, noise or other pollution beyond the site, and P3(2)(c) requires account to be taken of air quality objectives including PM2.5. At pre-application stage the Council's Environmental Health team asked for an Air Quality Impact Assessment covering construction emissions and operational traffic. None has been submitted. The Noise Assessment (Hawkins Environmental, section 7) confirms that no quantitative construction noise assessment has been carried out, even though it identifies earthworks and piling as the noisiest activities. Residents of Leigh Road, many of whose homes, [redacted] front directly onto the construction route, are entitled to have these impacts assessed before a decision is taken.

8. Protected trees – NPPF N2(1)(d) and DP3(2)(c)

N2(1)(d) requires development to conserve and enhance established trees, and DP3(2)(c) requires tree cover to be maintained and enhanced. The mature horse chestnuts on the Leigh Road boundary are protected by TPOs and are a defining feature of the street. The Arboricultural Implications Assessment accepts that the car park, access and footpaths encroach into their root protection areas by up to 18% – close to the 20% maximum normally regarded as tolerable for tree no. 1. At pre-application stage, officers stated that they "strongly believe a greater separation distance will be required". That advice has not been followed. In addition, construction vehicles using Leigh Road will pass beneath the overhanging canopies of these and other mature street trees; no assessment has been made of the risk of damage or of pressure for future pruning.

9. Essential information is missing – NPPF P2(3) and protected species

The application should not be determined until the following are resolved:

- Bats: the Preliminary Ecological Appraisal requires a bat emergence/re-entry survey of the substation building, which can only be done between May and September. The Planning Statement says this is "in the process of being undertaken", but no results have been submitted and the survey season has now ended. Government guidance (Circular 06/2005) is clear that the presence of protected species, and the extent to which they may be affected, must be established before permission is granted, as the Council itself reminded the applicant at pre-application stage.

- Contamination: asbestos has been found in near-surface soils and further testing is outstanding (Planning Statement, ground conditions). NPPF P2(3) requires adequate site assessment information to be available to inform the decision. Disturbance of asbestos-containing soils next to homes, a clinic and a respite centre is a matter of real concern to residents.
- Foul drainage: Southern Water's response of 1 October 2026 confirms there is no current wastewater network capacity, and the Planning Statement indicates reinforcement could take up to 24 months after permission.
- Biodiversity net gain: the development would result in a 75.4% loss of on-site habitat units, and the trading rules are not satisfied on site. The whole of the 10% gain, and more, depends on off-site units that have not been identified.

10. Coordination with the rest of the allocation – NPPF S4(2)(a)(i) and Policy H69

Policy H69 requires a coordinated approach to delivery of the former Oak Park School allocation, and Core Strategy policy DM6 requires that development does not prejudice neighbouring land. The Council's pre-application letter notes that this part of the site was promoted for 21 dwellings, while the care home was envisaged on the larger site to the north and east. The application takes one part of the allocation in isolation, supported only by an illustrative masterplan, with no agreed access strategy, no assessment of the combined traffic of the whole allocation and no mechanism to secure the rest of it. NPPF S4(2)(a)(i) identifies a substantial adverse impact on an allocation as a circumstance where the benefits of a proposal are likely to be outweighed. At the very least, the access and construction strategy for this site should be considered alongside that for the wider allocation, including the potential use of River Way / Crossland Drive, which Policy H69 itself identifies as an access option.

11. Planning balance

We accept that the scheme would provide care beds and make a modest contribution to housing supply. However, for the reasons above, the application fails NPPF TR6(4) on highway safety (both during construction and in operation), so that S4(2)(c) applies and the benefits are substantially outweighed. It is also contrary to TR4, TR6(1)–(3), P3, P4, N2 and DP3, and to Policy H69's requirements for access to the satisfaction of the Highway Authority and a coordinated approach. We respectfully ask the Council to refuse the application in its current form.

12. If the Council is minded to approve

If, despite these objections, the Council is minded to grant permission, we ask that the following be secured before a decision is issued rather than left to later conditions:

- A full Construction Traffic Management Plan, agreed with Hampshire County Council as Highway Authority, with construction access taken from River Way / Crossland Drive rather than Leigh Road (as another respondent has also requested).
- If any construction traffic must use Leigh Road: no deliveries during school arrival and departure times or the day-care drop-off and pick-up periods; a limit on vehicle size; banksmen; all contractor parking within the site; and a pre-construction condition survey of Leigh Road with a commitment to repair damage.

- An increase in on-site car parking to accord with the Parking SPD standard for sites outside the town centre, supported by actual staffing and shift data.
- Tree protection measures covering the Leigh Road street trees along the construction route, not just the trees on the site boundary.
- A named site contact and a programme of works provided to all residents of Leigh Road and Lavant Drive before work starts.

We would be grateful if you could acknowledge receipt of this objection, notify us if amended plans or further information are submitted, and let us know if the application is to be decided by the Planning Committee, as we would wish to attend.

Yours faithfully,

[redacted]