

PLANNING OBJECTION LETTER

**Re: Planning Application F/26/101367 (Planning Portal Reference 14891540): Site – 4
Oakwood Road, Hiltingbury, Chandler's Ford, SO53 1LU**

Proposal: Change of use / conversion of existing dwelling and associated garage (Use Class C3) to provide residential accommodation for up to six adults with learning disabilities and support needs, together with associated communal facilities, staff room/office and parking (Use Class C2).

Dear Sir/ Madam,

1. Introduction

We are the owners and residents of 6 Oakwood Road, Hiltingbury, the immediately adjoining property to the application site, and we formally object to the proposed change of use from a C3 residential to a C2 residential care. Our objection is based on material planning considerations including conflict with Eastleigh Borough Council's Local Plan Policy DM1 and the Hiltingbury Road West Character Appraisal, harm to the character and amenity of the area, highways and parking concerns, over-intensification of the site, and significant inaccuracies within the submitted Transport Note and Travel Plan Statement.

2. The Fundamental Premise of this Application - Repeated Mischaracterisation as a Typical Residential Dwelling

The basis upon which this application has been submitted, and upon which delegated determination appears to have been considered appropriate, is that the proposed change of use represents nothing more than a change in the status of the occupants of an otherwise unchanged family dwelling, and that the property will continue to operate in a manner broadly indistinguishable from a family home as viewed from the outside and experienced by the surrounding neighbourhood.

We submit that this premise is fundamentally and demonstrably false, and that it should not be accepted by the council as the basis for either the assessment of planning impact or the decision to determine this application under delegated authority.

Our concern is principally supported by the applicant's own Travel Plan Statement at Section 4, which states explicitly that outgoing staff leave prior to incoming staff arriving. This statement acknowledges in their own submitted documents that staff do not overlap at shift changes. This statement is operationally incompatible with the requirements of a CQC registered residential care facility. Regulation 17 of the Health and Social Care Act 2008 Regulated Activities Regulations 2014 requires registered providers to maintain accurate, complete and contemporaneous records in respect of each service user, and the CQC's own

inspection framework specifically assesses handover procedures under both the Safe and Well Led inspection domains as a measure of whether a service is operating safely and effectively. A documented handover of care responsibility for six adults with complex needs, behaviours of concern and individual care plans between outgoing and incoming staff is therefore not optional but a direct regulatory requirement. It is a professional necessity that cannot be achieved if outgoing staff have already departed before incoming staff arrive. The applicant cannot simultaneously claim CQC compliance and assert that no staff overlap occurs at shift changes.

One of these statements is incorrect, and the inconsistency between them has a direct and material consequences for the accuracy of vehicle movement and parking demand assessment submitted with this application. If proper regulatory handovers do occur, outgoing and incoming staff will be present at the property simultaneously at each of the three daily shift changes at 07:00, 14:00 and 22:00, generating parking demand that significantly exceeds those assessed in the Transport Assessment. If proper handovers do not occur, the applicant must explain how they will maintain standards of care continuity and good governance. This is not merely an operational inconsistency; it represents a potential safeguarding failure. Not only does this not meet the CQC standards, but it fails to meet Regulation 13 of the Health and Social Care Act 2008 Regulated Activities Regulations 2014, which requires registered providers to protect service users from abuse and improper treatment, while Regulation 9 requires care and treatment to be appropriate, meeting the needs of the service users at all times. A gap in staffing cover at shift changes, however brief, is incompatible with both these requirements.

Looking at the practical consequences of this Travel Plan contradiction and to the immediate question of vehicle overlap at the point of handover the worst case scenario, using the five parking spaces presented in the Transport Assessment, and the assumed maximum of five to six staff present during day and afternoon shifts, a compliant regulatory handover with both outgoing and incoming staff to be present simultaneously, will create a need for up to twelve staff vehicles to be accommodated at each shift change. With only five on site spaces available, the remaining seven vehicles would have no option but to park on Oakwood Road or the surrounding street network.

This creates a further operational problem that has not been addressed anywhere in the applicant's submitted documents. Once incoming staff have parked on the surrounding street network and entered the property to commence their handover, the outgoing staff - parked on the driveway - cannot leave until the handover is complete. At that point the outgoing staff return to their vehicles on the driveway and depart. However, the incoming staff who are parked on the street are now inside the property providing care to six adults with complex needs. They cannot leave those residents unattended to go and move their vehicles from the street to the now vacant driveway spaces. The practical consequence is that staff vehicles will remain parked on Oakwood Road not merely for the duration of the handover but potentially for the entire duration of their shift.

This scenario, which flows directly and inevitable from the combination of the regulatory handover requirement, coupled with limited on-site parking, and the fundamental duty of care preventing staff leaving residents unattended, means that regular and sustained on

street parking is not merely a possibility, but a foreseeable operational certainty. This has not been assessed, acknowledged or addressed within the Transport Assessment, the Travel Plan or the Planning Statement and represents a material omission from the highway impact assessment.

The submitted Operational Management Plan, Transport Assessment, Travel Plan and Design Quality Statement collectively describe a facility that is categorically different from a family home in every material operational respect. It is a CQC registered residential care facility operating continuously on a 24-hour basis. It has a requirement for a minimum number of two staff overnight and a maximum of six trained care staff throughout the day to always be present. Structured shift patterns with defined changeover times at 07:00, 14:00 and 22:00 exist every single day of the year including weekends and bank holidays. It requires agency and bank staff cover for sickness and annual leave. It generates regular visits from healthcare professionals, social workers, CQC inspectors and specialist transport providers. It has dedicated staff office and administrative space. It operates telecare and monitoring infrastructure. It has formal safeguarding procedures and regulated admission processes. It is overseen by a Registered Manager who is personally accountable to the CQC.

A further illustration of the fundamental difference between the proposed use and a typical family dwelling is the actual number of people who will occupy or be present at the property at any given time. The proposed development will accommodate six adult residents on a permanent basis. However, the staffing model described in the submitted documents confirms that during the day shift and afternoon shift, from 07:00 to 22:00 up to six adult staff members will also be present, bringing the total number of people in the property to twelve adults simultaneously. During the overlap period between 07:00, 14:00 and 22:00, when shift handovers occur alongside the presence of residents, the property will regularly contain more people than would typically be present in even the largest family dwelling in this neighbourhood, being 18, namely 12 staff and 6 residents.

At night between 22:00 to 07:00, two waking staff members will be present alongside six residents, meaning the property will be occupied by eight adults throughout the night every night of the year. By comparison a typical family home in this area would be expected to accommodate perhaps four to five occupants at most, the majority of whom would be asleep overnight rather than engaged in active waking care responsibilities.

The assertion that the proposed use is comparable to a typical residential dwelling is therefore not supportable even on the most basic measure of occupancy. The property will regularly contain twice the number of people than a large family home might accommodate, with active staffing present throughout the night, every night, on a permanent basis. This level of occupancy and continuous activity is categorically different from a family home, and the planning impacts must be assessed accordingly.

None of the above characteristics are present in a typical residential dwelling. A family home does not have shift changes at 22:00 every night. A family home does not require CQC registration or face regulatory inspection. A family home does not generate structured daily visits from community health teams and safeguarding professionals. A family home does not require formal acoustic design, specialist equipment storage, or technology enabled care

infrastructure. A family home does not have a staff office or require agency workers to cover absences.

The applicant has sought to minimise the planning significance of these differences by repeatedly asserting throughout the submitted documents that the development is comparable to a typical residential dwelling. As we demonstrate throughout this objection, that assertion is not supported by the applicant's own operational documentation and should not be accepted by the council.

We therefore submit that the fundamental premise of this application is flawed, that the submitted documents do not support it, and that the council should assess this application for what it is rather than for what the applicant asserts it to be. For this reason alone, and before considering the detailed concerns set out in the remainder of this objection, **we submit that delegated determination is inappropriate and that this application warrants full committee scrutiny.**

3. Character of the Area and Policy Conflict

Eastleigh Borough Council's own Local Plan Policy DM1 and the Hiltingbury Road West Character Appraisal describe this as a quiet, low-density residential area of detached family homes. The loss of a family dwelling to a C2 institutional use is contrary to this characterisation and conflicts with the council's stated planning policy framework. We formally request that the council confirm whether the applicant has adequately addressed this policy context, and whether the loss of a C3 dwelling, in this area of acknowledged housing need, is considered acceptable for planning terms.

4. Conflict with the Accommodation for Older People and Those in Need of Care SPD

The applicant's own Planning Statement at paragraph 4.10 acknowledges that the Council's Accommodation for Older People and Those in Need of Care Supplementary Planning Document requires schemes to be within 400 metres of a bus stop or other access to public transport, and that residents should not have to leave their local area to access essential services. The Planning Statement then asserts at paragraph 5.7 that these requirements satisfied.

We formally and specifically dispute both assertions.

On the question of public transport accessibility, as evidenced in detail in Section 6 of this objection and supported by Appendix 3, the bus stops within 400 metres of the site are school bus stops that do not serve the public and cannot be counted as public transport provision for the purposes of this SPD requirement. The nearest genuinely public bus service, the 44 operated by Community First and runs through Pine Road and Pine Crescent, and is located beyond 400 metres from the site. The service is a 16-seat minibus, that is not designed for fixed wheelchair access. It has no floating floors and would need to be consulted about operational practicalities in assisting these residents. The service itself operates only three times per day on weekdays only with no weekend or Bank Holiday

service. When considering the requirements of staff travel, this does not align with any of the operational shift change times of 07:00, 14:00 or 22:00, and we propose that this service cannot credibly be presented as satisfying a requirement for accessible public transport provision.

On the question of residents not having to leave their local area to access essential services, we would draw the council's attention to the following concerns which are addressed in greater detail elsewhere in this objection. The GP surgery identified in the Travel Plan at approximately 994 metres is incorrect. There are two GP surgeries located within Chandler's Ford, being Fryern Surgery at 1384m, and Park Road Surgery at 1500m from the applicant site. Both routes are not served by any practical bus connection, and on foot will require navigation of hilly terrain. The walking routes to local amenities involve footpaths that are uneven, narrow and require road crossings without dropped kerbs, **as evidenced in Appendix 4**. The nearest village store, Morrison's, is accessed via the same inaccessible route, as is Tesco Direct further down, off Ashdown Road. For six adults with complex needs and physical support requirements who do not travel independently, these are not theoretical accessibility concerns but practical operational realities that directly affect whether residents can genuinely access essential services without leaving their local area.

We would further note that the SPD requirement that residents should not have to leave their local area to access essential services must be read in the context of what accessing those services means to the specific residents proposed for this facility. These are adults who cannot travel independently, who require one to one support for all community access, and who will rely on specialist transport for medical appointments and other essential services. The applicant has not addressed how these essential journeys will be made, what transport provision will be available, or how this meets the SPD requirement in practice rather than simply in theory.

The SPD requirements are not merely locational criteria to be satisfied by proximity on a map. They are substantive requirements about whether future residents can genuinely access public transport and essential services in practice. The applicant has not demonstrated compliance with either requirement to the standard the SPD / Local Plan demands, and the council is respectfully requested to assess this independently and rigorously rather than accepting the applicant's assertions at face value.

We would also draw the council's attention to the fact that the Accommodation for Older People and Those in Need of Care SPD, whilst dating from 2011, remains a material consideration in the determination of this application. The applicant has chosen to reply upon it selectively in support of the principle of the proposed use whilst failing to demonstrate genuine compliance with its locational and accessibility requirements. The council should not permit the applicant to invoke the SPD as a benefit whilst disregarding its requirements as a constraint.

5. Transport Assessment – Inaccuracies and Omissions

Parking, access and Tree Preservation Orders – the application claims five parking spaces are deliverable, but the presence of the protected oak tree (**TPO No 265**) significantly constrains manoeuvring within the site. Photographic evidence demonstrating the constraint imposed by the protected oak tree on vehicle manoeuvring within the site is provided in **Appendix 1**.

We respectfully request that the council's highways officer physically inspects the site rather than relying solely on the swept path drawings submitted by the applicant. The swept path analysis submitted by the applicant does not adequately address the practical reality of vehicles needing to either reverse into parking spaces from Oakwood Road or reverse out onto a live road to exit the site. Oakwood Road is a 5.3m metre wide carriageway with no footway separation at the site access point. Reversing movements onto the road, particularly given the high brick wall and large hedge at the boundary which restricts visibility as shown in Appendix 1, present a material highway safety concern that has not been adequately assessed. This is compounded by the volume of through traffic using Oakwood Road as a rat run and the proximity to the Hiltingbury Road junction. Furthermore, the planning statement asserts that the property is not subject to any Tree Preservation Orders. **This is factually incorrect.** The oak trees along Oakwood Road are subject to Tree Preservation Orders, and this material misrepresentation has direct consequences for the accuracy of the application. The TPO for the oak tree at the subject site is TPO No 265. The protected oak tree within or immediately adjacent to the site curtilage demonstrably affects vehicle manoeuvring space, access to the proposed cycle store, and the practicality of the parking layout as assessed. The council is respectfully requested to verify the Tree Preservation Order status of the relevant trees before determining this application, and to consider what weight should be given to an application that contains a material factual inaccuracy at this point.

The cycle store - location appears inaccessible, see **Appendix 6**, given the tree canopy and root zone, and the location of parking space 1. The application demonstrates this to be practically unusable.

Shift handovers and vehicle numbers – The applicant states no vehicle overlap occurs at handover, yet they operate under CQC registration, which requires documented handover processes between outgoing and incoming staff (**Addressed in Point 2 above**). A proper CQC-compliant handover cannot be instantaneous. The shift changes at 07:00, 14:00 and at 22:00, realistically presents a period where both sets of staff vehicles are present. This is not reflected in the transport assessment and represents a material omission. Furthermore, the Transport Assessment considers only permanent staff vehicle movements and makes no provision for the following categories of visitors, and vehicles, that are a foreseeable and are a routine consequence of operating a CQC-registered residential care facility:

- Agency and bank staff, who are routinely used to cover sickness, annual leave and staffing gaps in the care sector and who, by definition, will be unfamiliar with parking

arrangements and less likely to use sustainable travel modes than established local staff.

- Healthcare and professional visits, including visits from GPs, community nurses, occupational therapists, social workers, speech and language therapists, CQC inspectors and safeguarding professionals. The applicants own Operational Management Plan acknowledges that residents may have ongoing relationships with healthcare professionals. These visits will generate additional vehicle movements that have not been quantified or assessed.
- Specialist transport vehicles, including patient transport, wheelchair-accessible vehicles and community transport, which will be required to support residents accessing medical appointments, day services and community activities. Given that residents do not travel independently, these movements are not incidental but are a fundamental operational requirement of the facility. Such vehicles require space to stop, turn and manoeuvre safely within or immediately adjacent to the site, and no assessment of this has been provided. The failure to account for these categories of vehicle movement means the transport assessment significantly underestimates the true parking impact of the proposed development.

One additional note of interest: Agency staff, by their nature, are drawn from a wider pool and are far more likely to travel by car. This undermines the argument that staff will be predominantly locally recruited and will travel sustainably.

Census Data – The application relies on 2011 Census travel-to-work data. This is now 15 years old and predates significant changes to working patterns, traffic volumes, and the local road network. The council should not accept this as a reliable baseline.

Oakwood Road traffic context – The assessment fails to acknowledge that Oakwood Road functions as a rat run between Chandler's Ford, Hiltingbury, and routes to the M3 and Ampfield. Traffic volumes are materially higher than would be expected for a quiet residential cul-de-sac.

The proximity to Sherborne House School entrance already creates significant parking and traffic pressure at school drop-off and collection times.

Merdon Avenue Primary School, Hiltingbury Infant and Junior School and Thornden School generate substantial pedestrian and vehicle movements. None of these three schools are assessed in the transport note.

The application site is the second property from the Hiltingbury Road junction, where turning movements are already difficult, particularly with on-street parking from existing residents and school-related parking. **Appendix 2** provides photographs illustrating existing on-street parking conditions and the constraints at the junction.

6. Public Transport – Misleading Claims

Bus Provision – The Lakewood Road stops referenced in the transport note are school bus stops. **Photographs can be found in Appendix 2.** They do not serve the public and cannot be counted as sustainable transport provision.

Bus service 44 operating along Pine Road/Pine Crescent is a community minibus service operated by the Community First. The service runs three times per day, Monday – Friday only, with no weekend or Bank Holiday service. **The Timetable is attached in Appendix 3,** and this confirms that it does not align with any of the shift change times of 07:00, 14:00, or 22:00. It cannot credibly be presented as a viable travel option for shift workers.

The nearest main bus route requires a walk to Winchester Road, via Thornden School, The Transport note describes this as a 14-minute walk but does not account for the significant gradient, the condition of the pavements, or the practicality for workers arriving or departing at 07:00 or 22:00 in darkness or adverse weather.

Footpath Conditions - Appendix 4 provides photographs of the footpath conditions in and immediately around 4 Oakwood Road and road crossing points on both routes to the bus stops. These demonstrate a very different picture to that highlighted within the Transport Assessment, Page 6, Figure 7, which highlights a shared use route close to the site location. **This is factually incorrect and misleading.** The images within Appendix 4 demonstrate that pedestrians are required to cross roads without dropped kerbs at multiple points along each route. It should also be noted that this is the same route to the nearest village store, which the applicants Travel Plan identifies as being accessible on foot at 945m.

The condition and accessibility of these paths directly contradict the applicant's assertion that the site benefits from a walkable environment with good access to local amenities. This raises both a highway safety concern regarding accessibility, particularly given that the residents of the proposed development are adults with complex needs and physical support requirements who will need to access the community on foot with staff support.

7. Resident Access to Services

The GP surgery is identified in the Travel Plan as being approximately 994m from the site. However, this is **factually incorrect and misleading.** Fryern Surgery is in fact 1384m and Park Road Surgery 1500m, both routes are hilly in nature and not meaningfully served by the local bus routes. This raises the question of how six adults with complex needs and behaviours of concern will access routine medical care, and what the resulting transport demand will be. This has not been assessed and represents a further omission from the submitted documents.

8. Design Quality Statement – Anomalies and Contradictions

A review of the Design Quality Statement submitted in support of the application has identified several significant anomalies and contradictions, both within the document itself and between it and other submitted documents. These are address in turn below:

The Mischaracterisation as a Typical Residential Dwelling – As set out in detail at Point 2 of this objection, the applicant repeatedly characterises the proposed development as comparable to a typical residential dwelling throughout the submitted documents, including within the Design Quality Statement itself, which describes servicing arrangements and activity levels as comparable to a typical residential dwelling. For the reasons set out in point 2, we submit that this characterisation is fundamentally misleading and should not be accepted by the council as a basis for determination. **We do not repeat those arguments here but asks that the council reads point 2 and 8 together in assessing overall reliability of the Design Quality Statement as a document.**

Level Access Contradiction – Section 12 of the Design Quality Statement states that the external spaces include “level access throughout external spaces”. This is directly contradicted by the physical characteristics of the site. The rear garden is sloped in nature, a fact acknowledged implicitly within the Planning Statement and verifiable from the site’s typography. These two statements cannot both be true. This is a further factual inaccuracy in the submitted documents and is directly relevant to both the emergency egress concerns addressed in Section 9 of this objection and the accessibility credentials of the external space for wheelchair users and residents with mobility needs. If the garden is not level, the claim of level access throughout is misleading, and the applicant’s assertions regarding the suitability of the external space for residents with complex physical needs are materially overstated. In fact, **Appendix 5 provides photographic evidence** of the rear garden taken from the neighbouring property at 6 Oakwood Road. These photographs clearly demonstrate the following material concerns. The garden is demonstrably not level, directly contradicting the Design Quality Statement’s assertion of level access through out external spaces. **Image 1** shows a raised planting bed with stone edging creating an additional level change between the patio area and the lawn and further stepped level change between the patio area and the lawn, and a further level change between the patio and the side access path. Multiple level changes are visible within a relatively small external space, none of which have been acknowledged or addressed in the submitted documents.

Appendix 5, Image 2 provides further photographic evidence of the level changes within the rear garden, taken further down the garden towards the rear boundary. This image clearly shows stone steps into the garden, a raised brick retaining structure, and multiple distinct level changes across the garden space. This irrefutably demonstrates that the garden is not level and that the Design Quality Statement’s claim of level access throughout the external space is factually incorrect.

The presence of these steps and the raised brick structure have additional significance beyond the level access contradiction. In an emergency evacuation scenario, these features would present a direct and immediate physical obstacle to the safe movement of residents

with mobility impairments, wheelchair users or those with complex needs. Staff assisting residents to evacuate via the conservatory exit in darkness, adverse weather or in a state of distress would face these obstacles without warning, as they are not identified or acknowledged anywhere in the submitted documents. Furthermore, the brick retaining structure visible in this image forms part of the shared boundary between the application site and 2 Oakwood Road. Its presence and height relative to the garden levels on both sides is directly relevant to the noise and amenity assessment that we have requested, as it demonstrates the physical relationship between the two properties and the way in which sound generated will travel toward and over the boundary and into the neighbouring property.

Storage Claims Not Demonstrated on Floor Plans – Section 7 of the Design Quality Statement states that “adequate storage is provided throughout the building to accommodate mobility aids, specialist equipment and general household items” and that ensures “this ensures that circulation spaces remain clear and unobstructed.” However, the submitted floor plans do not identify any dedicated storage areas for mobility aids or specialist equipment. This is a direct contradiction between the Design Quality Statement and the actual proposed layout. The council is requested to require the applicant to demonstrate specifically on the floor plans where this storage is to be located, what dimensions are proposed, and how this meets the CQC-registered facility supporting adults with complex physical needs, before this application is determined.

Acoustic Design Ambiguity – We draw the council’s attention to a further ambiguity within the Design Quality Statement at Section 7, which references “appropriate acoustic design to minimise noise disturbance” as a key feature of the internal environment. This statement is ambiguous in a material respect. It is unclear whether the applicant is asserting that appropriate acoustic design has been incorporated into the proposed development as a specific and measurable design feature, or whether it is merely acknowledging that acoustic design is a consideration that requires attention in this type of facility.

If the former, the applicant should be required to demonstrate specifically what acoustic design measures have been incorporated, where they are shown on the drawings, what specification of soundproofing or acoustic treatment has been proposed, and how this meets the needs of six adults with complex needs, plus associated staff, in a converted domestic property that was not originally designed or built for this purpose. A converted family home does not inherently provide the acoustic performance required for a CQC registered care facility accommodating adults with complex needs and potential behaviours of concern, and the mere assertion that acoustic design is a key feature does not demonstrate that it has been adequately addressed.

If the latter, the applicant is effectively acknowledging that acoustic design requires careful consideration in this type of development while simultaneously asserting at paragraph 5.36 of the Planning Statement that there are no noise implications because only internal works are proposed. These two positions cannot be reconciled. You cannot acknowledge that acoustic design is a key consideration requiring attention and simultaneously dismiss noise as a non-issue.

In either case the ambiguity itself is a material concern. The submitted documents do not contain any acoustic specification, any soundproofing details, any assessment of the existing acoustic performance of the building, or any assessment of whether the proposed conversion will meet the acoustic requirements of a CQC registered residential care facility.

The council is requested to require the applicant to clarify precisely what acoustic design measures are proposed, provide a specification demonstrating how these meet the needs of the proposed use, and confirm whether an independent acoustic assessment of both the internal environment and the impact on neighbouring properties has been or will be undertaken prior to determining this application.

Wheelchair Parking Transfer Space- Section 13 of the Design Quality Statement states that the scheme provides “five parking spaces, including adequate transfer space for wheelchair users and dropped kerbs to enable level access.” However, no wheelchair transfer space is shown or dimensioned on the submitted site plan or parking layout drawings. Transfer space for wheelchair users requires a minimum of 1200mm alongside a designated parking bay and this must be clearly demonstrated on the drawings. Given that the parking layout is already significantly constrained by the protected oak tree and the available manoeuvring space, as evidenced in **Appendix 1**, the council is requested to require the applicant to demonstrate that the claimed wheelchair transfer space is genuinely achievable within the proposed layout without further compromising the available parking and manoeuvring area.

Absence of Lift Provision- A further and particularly significant omission has been identified within the Design Quality Statement and the proposed floor plans. The application makes no reference whatsoever to lift access or any other form of assisted vertical circulation between the ground and first floors of the proposed development. This is a serious concern for the following reasons. The Design Quality Statement at Section 6 makes extensive reference to accessibility and inclusive design, stating that “all principle access routes and internal spaces are designed to be fully step-free, with level thresholds throughout the building” and that circulation spaces are designed to “accommodate wheelchair users and mobility aids.” The document references wheelchair turning circles, accessible bathroom facilities and level access throughout. Yet it makes no provision for vertical access between floors for residents who use wheelchairs or have significant mobility impairments.

The proposed development will accommodate up to six adults with learning disabilities and complex support needs, including conditions referenced in the Planning Statement such as profound multiple learning disabilities, Down Syndrome, epilepsy, and sensory impairments. It is entirely foreseeable that one or more residents will have significant mobility impairments requiring assisted vertical access between floors.

The Planning Statement at paragraph 5.23 states that the proposed ground floor level provides step-free access with accessible bedrooms designed to meet M4(2) requirements. “This appears to acknowledge implicitly that full accessibility is only guaranteed at ground floor level, raising the fundamental question of how residents accommodated on the first floor will access all areas of the building if they have mobility impairments.

This omission is particularly significant in the context of emergency services, which we address in Section 9 of this objection. In an emergency requiring evacuation, the absence of lift provision means that residents on the upper floor who cannot manage stairs independently are entirely dependent on staff assistance. Given that the night shift is staffed by only two members of staff for six residents, the practical ability to safely evacuate all residents from the upper floor in an emergency without lift provision is a serious concern that has not been addressed anywhere in the submitted documents.

The Design Quality Statement references compliance with Building Regulations Part M and BS8300 inclusive design principles. Part M category M4(3) for wheelchair user dwellings requires consideration of platform lifts or other vertical circulation solutions where accommodation is provided over more than one storey. The council is requested to require the applicant to demonstrate specifically how vertical access between floors will be provided for residents with mobility impairments, and how this meets the accessibility standards claimed within the Design Quality Statement, before this application is determined.

9. Emergency Egress and Fire Safety

A review of the proposed floor plans raises serious concerns regarding emergency egress arrangements for the proposed development that go beyond the scope of internal works and have material planning and building safety implications.

The removal of the rear kitchen door means that emergency exit from the rear of the property is proposed solely via the conservatory. This raises the following specific concerns which we respectfully request the council refers to its building control advisors and Hampshire Fire and Rescue Service before this application is determined.

The conservatory exit leads to the rear garden which, as noted in Section 8 of this objection, is sloped in nature, directly contradicting the Design Quality Statement's claim of level access throughout external spaces. For six adults with complex needs, many of whom may use wheelchairs or mobility aids, evacuation via a sloped garden in an emergency presents a material safety risk that does not appear to have been assessed anywhere in the submitted documents.

The proposed cycle store on the side of the property, **see Appendix 6**, appears to obstruct or eliminate what would otherwise serve as a direct route between the front and rear of the property. In an emergency scenario, the absence of a clear side access route means that the emergency services attending at the front of the property cannot rapidly access the rear garden without passing through the building itself. This has direct implications for the fire service access and rescue operations.

The combination of removing the rear kitchen door, relying on a conservatory egress to a sloped garden, blocking side access with a cycle store, and providing no lift for upper floor residents creates a cumulative emergency egress concern of significant seriousness. With only two night shift staff responsible for six residents, one or more of whom may have significant mobility impairments and be accommodated on the upper floor, the practical capacity to safely evacuate all residents in an emergency has not been demonstrated.

We formally request that the council requires consultation with Hampshire Fire and Rescue Service and its own building control officers as a precondition of determination, and that the applicant is required to demonstrate that the proposals meet all relevant fire safety and emergency access requirements for CQC-registered residential care facility. We further request that the council confirms whether the CQC has been or will be formally consulted as part of the determination process, given the emergency egress arrangements have direct implications for the regulated operation of the facility.

10. Wheelchair, Mobility Aid and Specialist Equipment Storage

The application makes no adequate provision for the safe and practical storage of mobility equipment, wheelchairs, specialist seating and other assistive technology that will inevitably be required by six adults with learning disabilities and complex support needs. As noted in Section 8 of this objection, the Design Quality Statement at Section 7 asserts that adequate storage is provided throughout the building, yet the submitted floor plans do not demonstrate where this storage is to be accommodated.

Wheelchair storage requires significant dedicated floor area with appropriate turning space and ideally level access to the exterior. If wheelchairs and mobility aids are stored in communal circulation spaces or corridors, this creates both a fire safety concern and an obstruction risk that is directly incompatible with the accessibility and circulation standards the applicant claims to meet within the same document.

We request that the council requires the applicant to demonstrate specifically on the floor plans where specialist equipment and mobility aid storage is to be provided, with dimensions, and that this is assessed against the operations requirements of a CQC-registered facility prior to the application being determined.

11. Noise and Amenity

The application does not include a noise or amenity assessment. The Planning Statement at paragraph 5.36 dismisses noise implications entirely on the basis that the proposed works are internal only. We submit that this reasoning is both circular and inadequate, for the following reasons.

We draw the council's attention to Section 8, Acoustic Design Ambiguity. The Design Quality Statement at Section 7 which references "appropriate acoustic design to minimise noise disturbance" as a key feature of the internal environment. This statement is ambiguous in a material respect. It is unclear whether the applicant is asserting that appropriate acoustic design has been incorporated into the proposed development as a specific and measurable design feature, or whether it is merely acknowledging that acoustic design is a consideration that requires attention in this type of facility. The submitted documents do not contain any acoustic specification, any soundproofing details, any assessment of the existing acoustic

performance of the building, or any assessment of whether the proposed conversion will meet the acoustic requirements of a CQC registered residential care facility.

We also draw the council's attention to the inherently circular nature of the assessment burden in this context. As existing residential neighbours, we have no reasonable basis upon which to fully assess or articulate the precise nature and extent of the noise and amenity impact that will arise from the proposed use, because that impact is entirely dependent on the specific needs, behaviours and daily routines of the future residents, information which is by its nature confidential, unknown to us, and not disclosed within the application documents.

The applicant is the party with the knowledge, experience and professional expertise to understand and quantify the likely noise and amenity implications of operating a residential care facility for six adults with complex needs and behaviours of concern in this specific setting. They operate 49 similar facilities and employ specialist behaviour support practitioners. They are therefore uniquely placed to assess what noise and activity levels are likely to arise and yet have chosen not to provide any such assessment, dismissing the matter at paragraph 5.36 of the Planning Statement on the wholly inadequate basis of the proposed works are internal only.

It is not reasonable to expect neighbouring residents to demonstrate harm when the information necessary to make that assessment is held exclusively by the applicant and has been deliberately omitted from the supporting documents. The absence of a noise and amenity assessment does not demonstrate that there is no impact. It simply means that the impact has not been assessed. The council cannot properly determine whether the proposal meets the amenity requirements of Policies DM1 and DM8 without this information, and we respectfully submit that the burden of demonstrating no material harm lies with the applicant and has not been discharged.

We further note that the rear garden, which will serve as the primary communal outdoor space for six adults with complex needs, is sloped in nature and directly adjoins our property boundary. The acoustic effect of a sloped garden is to direct sound upward and outward toward neighbouring properties rather than containing it within the site. This is a physical characteristic of the site that the applicant has not acknowledged and that makes the absence of a noise assessment even more significant.

We therefore request not merely that the council seek a noise assessment, but that it is requires one as a precondition of determination, and that this assessment specifically addresses the likely noise environment arising from the proposed use rather than from the proposed building works.

12. Communal Space Adequacy

We request that the council confirm that the communal space is sufficient to meet the relevant C2 residential care standards, and that this has been assessed against the specific needs of six adults with complex support needs and potential behaviours of concern.

In this context we draw the council's attention to a further factual inaccuracy in the Planning Statement. Paragraph 5.9 characterises the property as requiring only minor alteration and describes it in terms that imply a broadly original building. However, the Planning Statement's own paragraph 2.12 records that planning permission was granted in 2007 (LPA Ref: F/06/58109) for a two-storey side extension and in 2008 (LPA Ref: F/07/61465) for a rear first floor extension. The property has therefore already been extended twice and is materially larger than its original form. The internal layout resulting from these extensions may not be well suited to conversion for the proposed use, and the council should assess the proposed communal space provision against the actual existing building rather than the implied original form. The cumulative effect of the existing extensions on the internal layout, circulation routes, communal space availability and storage provision should be specifically assessed before this application is determined.

13. Clinical Waste Provision

The proposed development makes no reference anywhere in the submitted documents to the management and storage of clinical waste. This is a serious omission for a CQC registered residential care facility accommodating six adults with learning disabilities and complex support needs, several of whom are likely to be incontinent given the nature of the conditions described in the Planning Statement, including profound multiple learning disabilities, Down Syndrome and epilepsy.

Clinical waste generated by a residential care facility of this nature, including incontinence pads, soiled materials and other regulated waste streams, cannot be disposed of through standard domestic refuse collection. It requires dedicated clinical waste storage facilities, specialist collection by a licensed clinical waste contractor, and compliance with the Controlled Waste Regulations 2012 and the Environmental Protection Act 1990. None of this has been addressed in the submitted documents.

The practical implications for the appearance and amenity of the neighbourhood are material. Clinical waste bins and collection infrastructure are visibly and physically different from the standard domestic facilities. They require dedicated, secure and appropriately ventilated storage to prevent odour, pest attraction and health risks. They require regular collection by specialist vehicles that are larger and more frequent than standard domestic refuse lorries. The submitted documents describe refuse collection arrangements as remaining unchanged from the current domestic arrangements, which is wholly inadequate for a facility generating regulated clinical waste streams.

The council is requested to require the applicant to demonstrate specifically how clinical waste will be stored, what collection arrangements will be in place, where collection vehicles will stop and manoeuvre on Oakwood Road, and how the storage and collection infrastructure will be screened from public view before this application is determined.

14. Domestic Waste Volume

Separately from the clinical waste concern addressed above, the applicant's assertion at paragraph 5.31 of the Planning Statement that waste generation will be no greater than that associated with a traditional dwelling is not credible even in respect of standard domestic refuse. A Typical family home in this neighbourhood generates sufficient waste to fill a single standard refuse bin per collection cycle. The proposed development will generate waste of six adult residents plus associated waste from round the clock staffing, communal kitchen and dining facilities, and day to day operation of a managed care facility. This will self evidently generate a volume of waste materially greater than that of a single-family dwelling, requiring either significantly more frequent collections, multiple bins, or both.

The storage, presentation and collection of this volume of waste have material implications for the visual amenity of the street frontage and the character of the surrounding area. Multiple refuse bins presented at the roadside for collection on a residential street characterised by detached family home, each of which typically presents a single bin, is a visible and recurring indicator of the institutional nature of the proposed use that is directly at odds with the applicant's assertion that the development will be indistinguishable from a family home. This has not been acknowledged or assessed in the submitted documents and the council is requested to require the applicant to demonstrate specifically what waste storage and collection arrangements are proposed and how these will be managed so as not to detract from the visual amenity of the surrounding area.

15. Factual Inaccuracies in the Submitted Documents

While preparing this objection we have identified no fewer than **six demonstrable factual inaccuracies or material omissions** across the submitted planning documents. We set these out here in consolidated form to assist the council in its assessment of the overall reliability of the application documents.

First, the Planning Statement at paragraph 2.11 states that the site is not subject to any Tree Preservation Orders. This is factually incorrect. The oak trees along Oakwood Road are subject to Tree Preservation Orders, and this misrepresentation has direct consequences for the accuracy of the parking layout, swept path analysis and cycle store location assessments.

Second, the Travel Plan references overflow parking availability at Croyde Close. No road of this name exists in this area and has been determined to exist in Andover. The error calls into question the accuracy and reliability of the document, and the adequacy of the parking strategy it describes.

Third, the Planning Statement at paragraph 5.9 implies the property requires only minor alteration whilst failing to acknowledge that it has already been extended twice, in 2007 and 2008, materially increasing its footprint and internal layout from its original form.

Fourth, the Design Quality Statement at Section 7 asserts that adequate storage for mobility aids and specialist equipment is provided throughout the building, whilst the submitted floor plans contain no identified or dimensioned storage areas for this purpose.

Fifth, the Design Quality Statement at Section 13 states that the parking layout includes adequate wheelchair transfer space, whilst no such space is shown or dimensioned on the submitted drawings.

Sixth, The Design Quality Statement makes extensive reference to wheelchair accessibility, step-free access between floors, directly contradicting the accessibility claims made throughout the document.

Taken individually, each of these inaccuracies is a material concern. Taken together, they represent a pattern of assertions across the submitted documents that are not supported by the drawings and details provided. The council is respectfully requested to consider the cumulative weight of these inaccuracies in assessing the overall reliability of the application and to satisfy itself independently on each of the points raised before reaching any decision.

16. Property Covenants

We are currently investigating whether restrictive covenants apply to the title of 4 Oakwood Road that may limit the use of the property to that of a single private dwelling. We note that the existence of a restrictive covenant is a private legal matter separate from the planning process, and we understand that the council cannot refuse planning permission solely based on a covenant. However, we reserve the right to pursue any covenant that may exist as a separate legal matter independently of and in addition to this planning objection, and we draw this to the council's attention as a matter of record.

17. Changed Circumstances Since 2011

Home working has increased substantially since 2011. More residents in the surrounding streets now work from home or run businesses from home. This increases daytime residential occupation, sensitivity to noise and activity, and on-street parking demand throughout the day – none of which is reflected in the applicant's assessments.

Summary Request

Underpinning all the material concerns set out within this objection is the fundamental question of whether this application has been correctly framed and assessed. The premise upon which this application rests, and upon which delegated determination appears to have been considered appropriate, is that the proposed change of use represents nothing more than a change in status of the occupants of an otherwise unchanged family dwelling, and that the property will continue to operate in a manner broadly indistinguishable from a

family home. As we have set out in detail at Point 2 of this objection and is evidenced throughout the submitted documents themselves, this premise is demonstrably false. The proposed development is a 24-hour CQC registered residential care facility with all the operational, traffic, parking, noise, accessibility and safety implications that entails. It is not a family home, and it should not be assessed, or determined under delegated authority, as though it were one. The council is respectfully requested to assess this application for what it is, and we submit that doing so will demonstrate that the material concerns raised within this objection are substantial, evidenced and sufficient to warrant refusal or at a minimum full committee scrutiny before any decision is reached.

We wish to make clear that this objection is not made in opposition to the principle of providing care accommodation for adults with learning disabilities and complex needs, which we do recognise as an important social objective. However, we would draw the council's attention to the fact that many of the material planning concerns raised within this objection are not simply matters of neighbour amenity but are fundamental concerns about the duty of care owed to the very individuals this development proposes to serve. The inadequacy of emergency egress arrangements for residents with complex mobility needs, the absence of wheelchair and specialist equipment storage, the inaccessibility of the walking routes to public transport and local amenities for people who require physical support requirements, the failure to assess specialist transport needs for residents who cannot travel independently, and the absence of a noise and amenity assessment that addresses the environmental impact not only for current neighbouring residents, but for the proposed future residents at 4 Oakwood Road, who may be particularly sensitive to environmental disturbance. All these concerns go directly to whether this site and this proposal can genuinely deliver the safe, high quality and dignified living environments that current residents, as well as future residents deserve.

The applicant presents this development as responding to an identified need for appropriate care accommodation. We do not dispute that need. What we do dispute is whether this specific site, as proposed and as documented, can meet that need safely, practically and to the standard required. A development that is genuinely in the interests of its future residents should be able to withstand proper scrutiny on all these points. The fact that the submitted documents contain multiple factual inaccuracies and material omissions on matters directly relevant to resident welfare does not inspire confidence that the proposal has been adequately thought through in the interests of those it proposes to serve.

Our objection is therefore made as much in the interests of the future residents of this proposed facility as it is in the interests of the surrounding neighbourhood, and we respectfully request that the council satisfies itself fully on each of these matters raised before reaching any decision on this application. We request that the application is called to committee rather than determined under delegated authority given the number, nature and seriousness of the concerns raised.

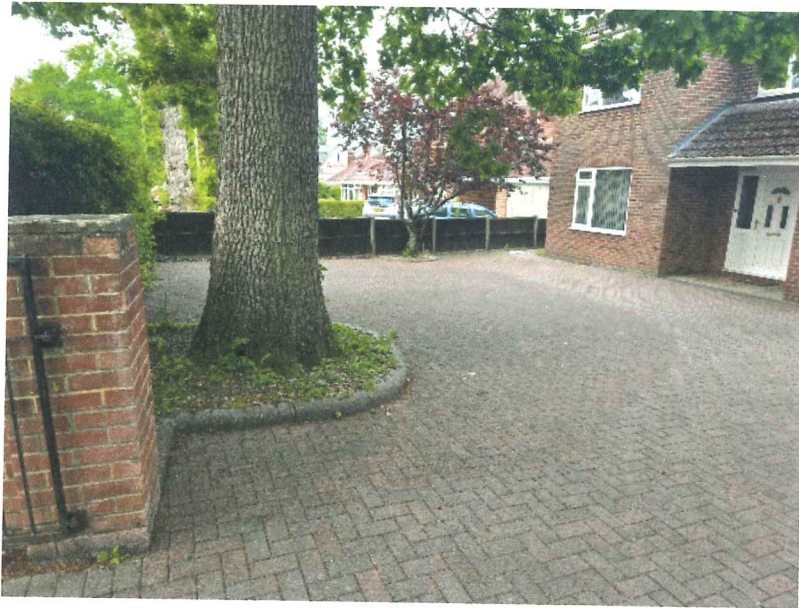
We trust that the council will give full and careful consideration to the material planning concerns set out within this objection.

Yours Faithfully,

Dr M J & Mrs C E Werson

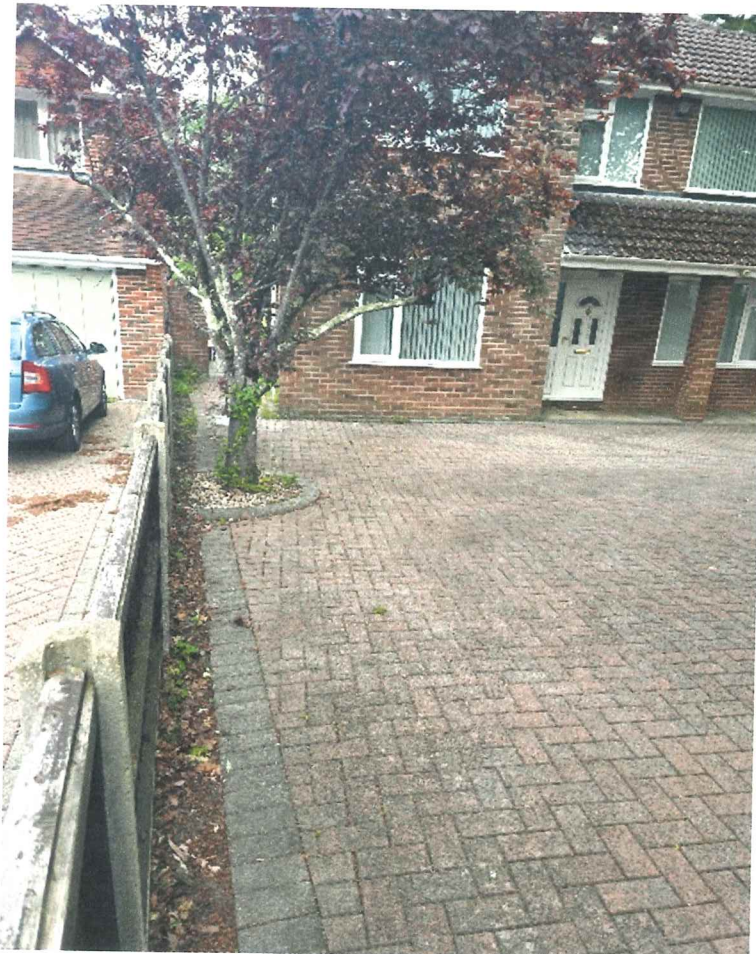
6 Oakwood Road, Hiltingbury, Chandler's Ford, Eastleigh, Hampshire, SO53 1LU

cc. Ward Councillors - Alan Broadhurst, David Pragnell, Dave Walker

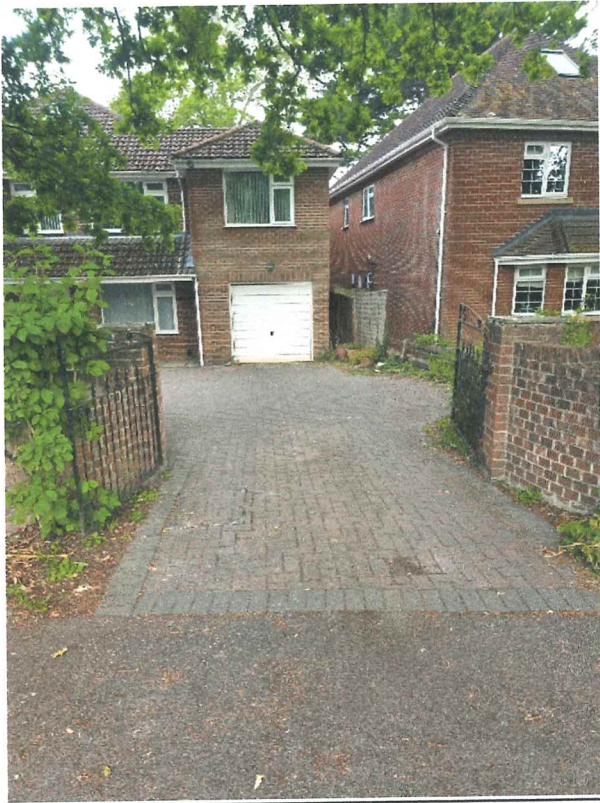


Appendix 1

Photo Image showing Oak
Tree from the drive entrance



View from the boundary edge
with 6 Oakwood Road



View of proposed parking area in front of garage from drive entrance – shows limited turning at drive entrance



View from the boundary of No 6 to the area for 4 marked parking bays – showing incursion of the Oak Tree and limited manoeuvrability

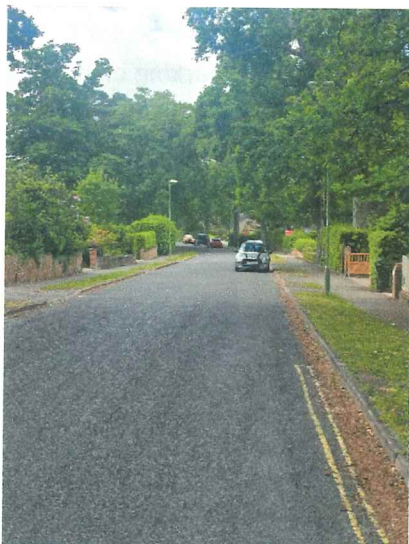
Appendix 2 – Images showing that vehicles park all along Oakwood Road throughout the day – as opposed to the clear google maps image used in the Transport Assessment



These images are taken from the top of the driveway outside 6 Oakwood Road



This image, taken from 6 Oakwood Road, shows properties opposite 4 Oakwood Road, namely 1 & 3 Oakwood Road and the proximity of their driveways to the site



These images continue to highlight parking along Oakwood Road, just down from the application site



Appendix 4 – The following images also evidence the actual pavement conditions – and not the image used on Page 6 of the Travel Assessment, which is selectively taken from Winchester Road



Lakewood Road Bus Stop – clearly showing it is School Service only



Image of bus stop on opposite side of Hiltingbury Road at Lakewood Road



View of pavement heading down Hiltingbury Road, from Oakwood Road towards Oakwood Close



Oakwood Close – route down to bus stop 44 at Pine Road – no dropped kerb



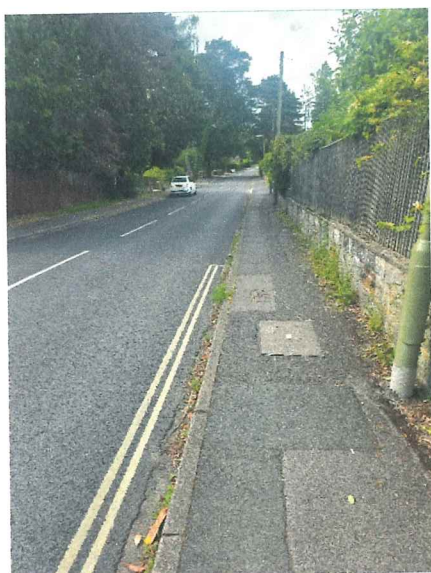
Path conditions on approach to Pine Road from Oakwood Close



Pine Road 44 Bus Stop – on opposite side of Hiltingbury Road



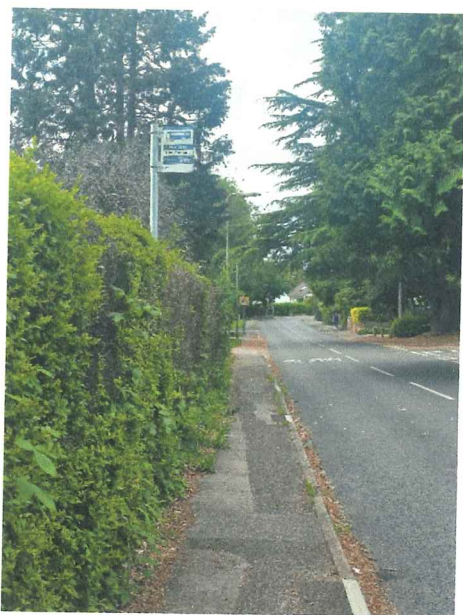
Image showing the bus stop on Hiltingbury Road, down at the nearest Village store is in fact a school service bus stop



View from Hiltingbury Road looking down Pine Road towards the Bus 44 Stops. This is the right-hand side of the road....



And this is the left-hand side of the road – Pine Road from Hiltingbury Road



Pine Road (Pine Crescent) Bus stop – 44 service



View up Beech Road towards Oakwood Road – from Pine Road, and just after the bus stop



Beech Close – will need to be crossed and no dropped kerb



Beech Close – showing pavement access once crossing the road



Path up Beech Road, from Beech Close toward Oakwood Road. This pavement is narrow in nature and uneven



44 Bus Service Timetable

Timetables valid from 02/03/2026 until further notice. Times here of stops, where shown (eg. W bound) this is the compass direction towards which the bus is pointing when it stops.

Eastleigh → Chandler's Ford
→ Valley Park → Eastleigh

Eastleigh → Valley Park →
Chandler's Ford → Eastleigh

Monday to Friday

Eastleigh Bus Station	1055	1455
Eastleigh, Hampshire Fire Service HQ (opp)	1100	1500
Chandler's Ford, Hut Farm Place (opp)	1105	1505
Chandler's Ford, Rail Station (NW-bound)	0745	1110
South Millers Dale, Rusland Close	0750	1115
Chandler's Ford Precinct (opp)	0752	1117
Bodycoats Road, Toynbee School (opp)	0755	1120
Chandler's Ford, Fryern Hill (o/s Waitrose)	0800	1125
Chandler's Ford, Valley Road (N-bound)	0805	1130
Hiltingbury, Hiltingbury Road (NE-bound)	0807	1132
Hiltingbury, Ashdown Shops (adj)	0810	1135
North Millers Dale, The Deanery	0815	1140
Flexford, Baddesley Bridge (nr)	0820	1142
Valley Park, Knightwood Road (SE-bound)	0821	1143
Valley Park, Bird Field (SW)	0824	1146
Valley Park, Lambourn Square (S-bound)	0826	1148
Hampshire Corporate Park (SE-bound)	0831	1153
Asda Car Park Bus Shelter (SW-bound)	0833	1155
Eastleigh, B&Q House (nr)	0838	1200
Velmore, Falkland Court (opp)	0840	1202
Eastleigh, Hampshire Fire Service HQ (o/s)	0843	1205
Eastleigh Bus Station	0900	1210

Eastleigh Bus Station	0920	1230	1630
Eastleigh, Hampshire Fire Service HQ (opp)	0925	1235	1635
Velmore, Falkland Court (adj)	0928	1238	1638
Eastleigh, B&Q House (adj)	0930	1240	1640
Asda Car Park Bus Shelter (SW-bound)	0935	1245	1645
Hampshire Corporate Park (NW-bound)	0936	1246	1646
Valley Park, Lambourn Square (N-bound)	0941	1251	1651
Valley Park, Bird Field (NE-bound)	0944	1254	1654
Valley Park, Knightwood Road (NW-bound)	0946	1256	1656
Flexford, Baddesley Bridge (adj)	0948	1258	1658
North Millers Dale, The Deanery	0950	1300	1700
Hiltingbury, Ashdown Shops (opp)	0955	1305	1705
Hiltingbury, Pine Road (SE-bound)	0957	1307	1707
Chandler's Ford, Valley Road (nr)	0959	1309	1710
Chandler's Ford, Fryern Hill (opp Waitrose)	1005	1315	1715
Bodycoats Road, Toynbee School (adj)	1010	1320	1720
Chandler's Ford, Rail Station (SE-bound)	1013	1323	1723
South Millers Dale, Rusland Close	1015	1325	1725
Chandler's Ford Precinct (adj)	1020	1330	1730
Chandler's Ford, Hut Farm Place (adj)	1025	1335	1735
Eastleigh, Hampshire Fire Service HQ (o/s)	1030	1340	1740
Eastleigh Bus Station	1035	1345	1745

No service on Saturdays, Sundays or Bank Holidays

The 44 Bus Service is operated by the charitable organisation Community First. Community First is the trading name for Community First Womersley, Registered Charity in England & Wales no. 1147527. Company no. 08071921. Privacy policy, Conditions of Carriage and fares are available at www.cfirst.org.uk

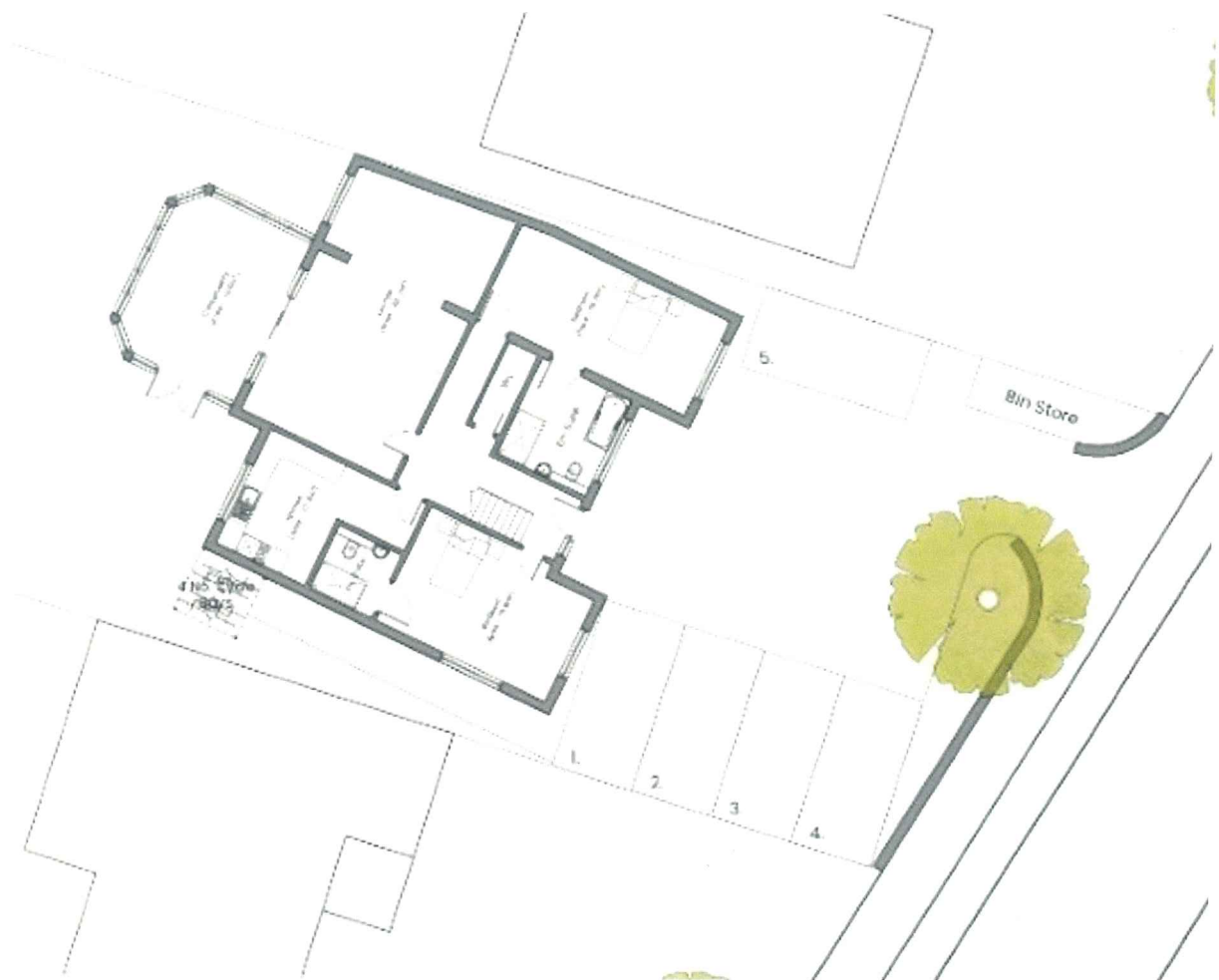
Supported by

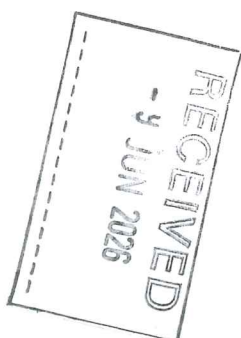


Appendix 5 – View of Rear Garden of 4 Oakwood Road showing unlevel ground



Appendix 6





Re: Planning Application F/26/101367 to 4 Oakwood Road
Detailed Objection from Dr. and Mrs. Werson at 6 Oakwood Road