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Havant Borough Council
Public Service Plaza
Civic Centre Road
Havant
PO9 2AX

Application reference: APP/25/00979

Site address: 7–9 London Road, Widley, Havant, PO7 5AT

Proposal: Change of use and conversion to temporary supported accommodation / HMO

Dear Sir or Madam,

I write [REDACTED] to formally object to the above planning application. My objection is made **to the proposal in its entirety**, including the **principle, nature, scale, intensity, layout and operation** of the proposed development.

This objection is based on a detailed review of the submitted application documents and supporting information, together with the substantive objections raised by other local residents. For the reasons set out below, the proposal fails to accord with the Development Plan when read as a whole, does not meet the tests of sustainable development set out in the National Planning Policy Framework (NPPF), and is not supported by adequate or lawful evidence.

1. Objection in principle – inappropriate nature and intensity of use

The proposal seeks to introduce a **highly intensive, management-dependent form of residential accommodation**, described as temporary supported accommodation for homeless families, into an established residential area.

The scheme would provide **14 units accommodating up to 24 occupants**, together with communal kitchens, dining areas, laundry facilities, staff and visitor activity, servicing and refuse collection, and a high level of turnover associated with “temporary” accommodation.

This represents a **material escalation in intensity** compared with any former residential or bed and breakfast use and would fundamentally alter the character of occupation of the site. The resulting level of activity, comings and goings and operational impacts would be wholly out of keeping with the surrounding residential context.

Policy **DM7 (Specialist Supported Accommodation)** does not provide blanket support for such development. It requires proposals to be demonstrably appropriate in their location

and to avoid adverse impacts on neighbouring amenity. In this case, the nature and intensity of the proposed use is inherently unsuitable for this location and conflicts with **Core Strategy Policies CS16 and CS17**, as well as **DM7**.

The application should therefore be refused **in principle**.

2. Unsuitable and unsafe accommodation for families

The application explicitly promotes the scheme as accommodation for **families with children**, yet the submitted plans demonstrate accommodation that is fundamentally unsuited to that purpose.

The units are predominantly **very small 1-bed and 2-bed studio-style units**, many with extremely limited internal space. Critically:

- There are **no private kitchen facilities** within individual units;
- Families would be required to rely on **communal kitchens and dining areas**;
- Facilities would be shared with **unrelated adults**, giving rise to obvious safeguarding concerns.

_____ rightly raised concerns that such arrangements are incompatible with normal family life, privacy, dignity and child safeguarding. The applicant has provided **no safeguarding strategy**, no family suitability assessment, and no explanation of how risks associated with shared facilities would be mitigated.

The accommodation falls significantly short of the **Nationally Described Space Standard**, and no policy-based justification has been advanced for this shortfall. The Local Planning Authority cannot reasonably conclude that the proposal provides an acceptable standard of living environment or complies with the NPPF objective of promoting healthy and safe communities.

These deficiencies are inherent to the layout and quantum of development and **cannot be remedied by condition**. The proposal therefore conflicts with **CS16, DM7**, and the NPPF.

3. Harm to residential amenity and sensitive neighbouring uses

The proposal would introduce sustained noise, activity and disturbance arising from:

- Communal kitchens and dining areas;
- Shared laundry facilities;
- Intensified daily comings and goings;
- Servicing, refuse collection and deliveries.

The site directly adjoins a **particularly sensitive residential use**, _____

_____. Regardless of its formal planning status, this is clearly a sensitive receptor in amenity terms.

Despite this context, the application includes:

- No Noise Impact Assessment;
- No operational or management plan;
- No safeguarding or supervision framework.

Policy **CS16** requires development to protect the amenity of existing and future occupiers, and **DM7** specifically recognises the potential for specialist accommodation to give rise to unacceptable amenity impacts if poorly located or inadequately controlled.

In the absence of any meaningful evidence, the Local Planning Authority cannot lawfully conclude that unacceptable harm to residential amenity would not arise.

4. Highways, parking and road safety – unacceptable and unresolved impacts

The site occupies a **constrained and hazardous corner location** at the junction of London Road and Hillside Avenue, where visibility is limited, pedestrian movement is constrained and on-street parking pressure already exists in neighbouring roads which includes The Brow (road directly opposite to the proposed site). [REDACTED] experience **existing parking issues in The Brow**, which is already sensitive to additional demand.

The proposal provides **only four on-site parking spaces**, two of which are designated disabled bays. No parking provision is made for:

- Staff or support workers;
- Visitors;
- Taxis or health appointments;
- Deliveries and servicing vehicles.

Residents have correctly identified that this will result in **inevitable overspill parking onto Hillside Avenue and The Brow**, particularly as parking restrictions end close to the junction. This would materially increase the risk of unsafe stopping, manoeuvring and pedestrian conflict.

The application fails to include essential supporting information, including:

- A Road Safety Audit;
- A visibility or junction assessment;
- A parking stress survey;
- A swept path analysis for refuse vehicles;
- An assessment of pedestrian–vehicle conflict.

These omissions are particularly serious given the intention to accommodate families and potentially vulnerable individuals. The proposal therefore conflicts with **Core Strategy Policy CS20** and the NPPF transport policies.

5. Fundamentally flawed Transport Statement

The submitted Transport Statement is materially unreliable and should not be afforded weight.

[REDACTED] identified multiple methodological flaws, including:

- Failure to account for cumulative trips from staff, visitors, taxis and support services;
- Reliance on assumptions of low car ownership with no supporting evidence;
- Inappropriate TRICS comparisons with a much larger hotel use;
- Failure to assess pedestrian and vehicle conflict at the rear access;
- Unsupported assumptions that Hillside Avenue is suitable for delivery and refuse vehicle stopping.

As a result, the Transport Statement does not provide a sound evidential basis for decision-making and cannot discharge the Council's obligations under the NPPF. Given the scale and management-dependent nature of the proposed use, these matters are fundamental to the acceptability of the development and cannot reasonably be deferred to post-permission controls.

6. Lack of management, operational clarity and transparency

The proposal is entirely **dependent on effective management**, yet the application provides:

- No management plan;
- No staffing model;
- No behaviour management strategy;
- No complaints procedure;
- No clarity on length of stay or resident turnover.

The application makes reference to a "local connection" requirement, but provides **no definition or enforceable mechanism** explaining how this would be applied.

[REDACTED] raised legitimate concerns regarding a **lack of transparency about previous use and placements**, which further undermines confidence in the applicant's assertions.

These matters go to the **acceptability of the use in principle** and cannot be deferred to condition.

7. Ecology and Habitats Regulations – fatal legal failure

The application site lies within the **Solent catchment** and the recreational impact zone for European designated sites.

The application acknowledges that mitigation for **nutrient neutrality** and **recreational disturbance** is required, yet fails to demonstrate that such mitigation is secured, deliverable or legally effective.

In the absence of a lawful Habitats Regulations Assessment position, the Local Planning Authority **must not grant permission**. This failure alone is determinative and places the proposal in direct conflict with **Core Strategy Policy CS11**, the NPPF and established case law.

8. Construction and environmental risks

The submitted asbestos survey identifies **high-risk Asbestos Containing Materials**, requiring removal under fully controlled conditions.

Despite this, the application provides:

- No Construction Environmental Management Plan;
- No details of contractor access;
- No noise or dust mitigation measures.

Given the proximity of neighbouring residential and sensitive uses, this further demonstrates that the application is **premature and inadequately assessed**.

9. Procedural and consultation concerns (for the record)

[REDACTED] became aware of this application largely through informal means and social media, rather than through any apparent direct consultation or site-based notification.

It is not apparent [REDACTED] that a site notice was displayed at or near the application site, nor that neighbouring occupiers were notified in the usual manner for a proposal of this nature and scale.

Whilst it is acknowledged that deficiencies in consultation do not, of themselves, necessarily constitute grounds for refusal, the apparent absence of effective site notification has materially limited early engagement and scrutiny of a proposal which is highly intensive, management-dependent and raises legitimate concerns regarding amenity, safety and environmental impact.

In these circumstances, I respectfully urge the Local Planning Authority to ensure that all statutory publicity requirements have been fully complied with and to afford appropriate weight to the representations received.

10. Conclusion

This objection is made **to the proposal as a whole and in principle**.

The development is inappropriate in nature and intensity, provides unsuitable and substandard accommodation, would cause unacceptable harm to residential amenity and highway safety, is unsupported by adequate technical evidence, and fails to meet statutory environmental obligations.

For these reasons, the proposal does **not represent sustainable development** and should be **refused in full**.

