

Development Management

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

11th April 2026

Further formal objection to planning application APP/25/00979

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

Objection maintained in principle and strengthened following revised submissions

Dear Sir or Madam,

I write further to my earlier objection in relation to the above application. Having now reviewed the revised plans, the updated Design and Access Statement, the Supporting Statement and the additional consultee responses, I confirm that my objection is maintained in full and in fact strengthened.

The additional material does not overcome the fundamental planning, amenity, transport, management and legal concerns previously raised. In several important respects, the new submissions either fail to address those concerns or introduce fresh inconsistencies which further undermine the application.

1. The proposal remains unacceptable in principle

The proposal still seeks permission for a highly management-dependent form of temporary accommodation comprising 14 studios with a stated maximum occupancy of 24 persons, intended for short-term occupation by families, 
Given the proposed capacity, this constitutes a Large HMO (Sui Generis) use, demanding a higher threshold of scrutiny regarding material harm to the neighbourhood's character.

The revised Design and Access Statement continues to describe the scheme in these terms and confirms that the two properties will retain separate entrances, shared facilities, an administration office and communal internal arrangements. Nothing in the revised submissions changes the essential nature of the proposal. It remains an intensive, non-standard form of accommodation inserted into an established residential location at a constrained corner site. The operational characteristics, the scale of occupation and the

reliance on ongoing management continue to make the use inherently unsuitable for this location. My objection in principle therefore remains.

2. The revised submissions contain a material contradiction as to whether the accommodation is genuinely self-contained

A central concern with the revised material is the applicant's repeated assertion that the studios are "self-contained". The Supporting Statement states that each studio will have a kitchenette and private bathroom and then claims that this will allow households to be independent.

However, the revised Design and Access Statement and floor plans continue to show extensive communal facilities, including very large communal kitchen/dining areas and shared laundry rooms. The ground floor plan identifies a communal kitchen/dining room of 48.95 sqm, a further communal social kitchen/dining room of 41.77 sqm and multiple laundry spaces. The Design and Access Statement itself expressly states that each property will retain access to shared kitchen, dining and laundry facilities.

That is not a minor drafting issue. It goes directly to the true character of the development. The proposal continues to operate as a communal, management-led form of accommodation rather than a conventional self-contained residential scheme. The Local Planning Authority must assess the proposal on the basis of how it would function in reality, not simply on how it is labelled in the Supporting Statement.

3. The claim that all rooms exceed minimum space standards is contradicted by the applicant's own plans

The Supporting Statement says that "all rooms and the number of people in them will exceed minimum space standards." This deliberately conflates basic Housing Act licensing minimums with proper planning standards. Under the Nationally Described Space Standards (NDSS), a 1-bed, 1-person unit requires a minimum of 37 sqm (or 39 sqm with a shower).

That assertion is directly contradicted by the revised plans. The first-floor plan shows, among others, the following unit sizes:

- Studio 9-06: 21.83 sqm
- Studio 9-07: 18.69 sqm
- Studio 7-06: 23.68 sqm
- Studio 7-05: 28.35 sqm
- Studio 7-03: 19.10 sqm

The ground-floor plan shows, among others:

- Studio 9-01: 23.37 sqm
- Studio 9-05: 23.46 sqm
- Studio 9-04 M4(3): 20.52 sqm
- Studio 7-01: 28.95 sqm
- Studio 7-02 M4(3): 26.44 sqm

These are very small units, less than half the size of the NDSS requirements, including multiple units proposed for two people. Accordingly, the applicant's broad claim that all rooms exceed minimum space standards is not credible on the face of the submitted drawings. This is a serious problem because the revised submissions were plainly intended to answer objections on living standards, yet they do so with an assertion that is inconsistent with the plans themselves. The Local Planning Authority cannot lawfully classify this as "high-quality design" under Policy CS16. That inconsistency significantly undermines the weight that can safely be placed on the Supporting Statement.

4. The revised submissions do not resolve the safeguarding and family suitability concerns

The applicant now says that the maximum number of adult tenants will be 14, with up to 10 children, and that the ten two-bedded rooms are intended for an adult and child. The single rooms may be used for pregnant women or people with disabilities.

This clarification does not solve the core problem. The units remain extremely small, and the model still relies on families and vulnerable individuals living in close proximity with unrelated households, with shared kitchens, shared laundries, shared circulation and communal amenity spaces.

There is still no submitted safeguarding strategy, no family suitability assessment, no child impact assessment and no evidence-based explanation as to why this model is appropriate for family occupation in the terms now described. The Council cannot be expected to infer that those risks are manageable merely because the applicant says the Council will allocate households carefully. These are fundamental planning matters that should have been properly evidenced at application stage.

5. The proposal remains heavily management-dependent, yet no actual Management Plan has been provided

The Supporting Statement attempts to reassure objectors by explaining that the Council will manage the tenants directly, use the statutory homelessness tests, provide tenancy conditions, operate a single point of contact and impose sanctions if behaviour standards are not met.

However, the same Supporting Statement then states that "A comprehensive Management Plan and Allocations Policy are currently in development."

That sentence is critical. It confirms that the application still does not include the very management framework on which the applicant relies to make the proposal acceptable. In other words, the proposal remains incapable of proper assessment because the Council is effectively being asked to approve a management-dependent use before the Management Plan exists.

That is not a technical omission. It goes to the heart of whether the development is acceptable at all. A proposal of this nature cannot be made acceptable merely by post-permission assurances that a management document will be prepared later. The operational

impacts of 24 temporary residents are so severe that the submission of a Management Plan cannot be lawfully deferred to a pre-commencement or Grampian condition. The evidence must be tested prior to determination.

6. The new office provision does not cure the management deficiency and introduces further activity

The revised ground floor plan now clearly identifies an office at No. 9. The Design and Access Statement also confirms that an administration office is located on the ground floor. This does not answer the objection. If anything, it confirms the operational and management-heavy nature of the scheme. A staffed or visited office means additional staff presence, additional vehicle trips, additional calls and comings and goings and a further departure from conventional residential use.

Yet the transport evidence still does not properly assess staff visits, support visits, visitor activity or the implications of operating the site with an on-site office.

7. The parking and traffic case is weaker, not stronger

The revised site plan still provides only four parking spaces. The Supporting Statement says those spaces will "most likely" be used by Council staff and maintenance contractors, while disabled bays are provided to support the accessible studios. It then states that the Housing Services team will try to keep the number of resident car owners to the number of available spaces, but also expressly accepts that "There may be times when it will be unavoidable that more spaces are required than are allocated however this will be kept to a minimum."

That is, in effect, an admission that parking overspill will occur.

The surrounding streets already experience parking pressure, including The Brow opposite the site. That local context formed part of my original objection and remains unchanged. The applicant's response is not to show that parking demand will be acceptable, but rather to say that any excess demand will be monitored and minimised. That is not a lawful substitute for proper assessment.

The proposal still lacks a Road Safety Audit, a parking stress survey, a visibility or junction assessment, swept path analysis for refuse or servicing vehicles and a robust assessment of pedestrian-vehicle conflict. Nothing in the revised submissions resolves those evidential deficiencies.

8. The Supporting Statement reinforces the objection that the Transport Statement is unreliable

The Supporting Statement adds several operational details which the Transport Statement did not robustly account for, including:

- staff use of the parking spaces,
- maintenance contractor attendance,
- regular site visits by Council staff and partner agencies,

- one-to-one support,
- cleaning in between tenants,
- emergency call-out arrangements,
- ongoing management and enforcement activity.

These are not incidental matters. They are part of the day-to-day functioning of the scheme. Their inclusion in the Supporting Statement further demonstrates that the original transport evidence understated the real operational activity associated with the proposal. The Transport Statement therefore remains materially unreliable.

9. The claim that the revised use will create lower turnover than B&B does not remove planning harm

The Supporting Statement says that reclassification from B&B to HMO will mean lower disruption and lower turnover than the previous B&B use. Even if that is accepted at face value, it does not resolve the planning issue.

The question is not simply whether turnover may be lower than a historic B&B model. The real planning question is whether the proposed use, in the form now applied for, is acceptable in this location having regard to its scale, intensity, communal layout, parking implications, management dependence, noise, amenity impacts and effects on neighbours.

That question remains unanswered in the applicant's favour.

10. The revised Design and Access Statement still relies on unsupported assertions about neighbour amenity and parking

The revised Design and Access Statement continues to assert that the development will not cause unacceptable harm to the amenity of neighbours and that four parking spaces meet the relevant criteria. Those are conclusions, not evidence.

There is still no Noise Impact Assessment, no substantive management plan, no parking stress evidence, and no meaningful site-specific assessment of the effect on neighbouring occupiers. The mere repetition of the applicant's opinion that the proposal is acceptable does not cure the evidential deficiencies identified by local residents.

11. The Climate Change Officer's comments identify another unresolved deficiency

The Climate Change Officer states that no sustainability assessment has yet been submitted, that the current material does not demonstrate how an EPC rating of C will actually be achieved, and that there is a lack of detail on carbon reduction, water and waste measures, renewable technologies and the overall sustainability performance of the proposal.

This is important because the revised Design and Access Statement still speaks only in general terms about energy performance and refurbishment works, rather than demonstrating a measurable sustainability outcome. The proposal therefore remains under-evidenced in relation to sustainability and efficient use of resources.

12. The Housing consultee support in principle does not answer the planning objections

The Housing consultee supports the proposal in principle because of the local need for temporary accommodation and the financial and logistical pressures on the Council. I do not dispute that there is a housing need. However, need does not disapply the Development Plan or remove the requirement for a policy-compliant, properly evidenced and locally appropriate form of development.

The issue is not whether the Council faces temporary accommodation pressures. The issue is whether this particular proposal, on this particular site, in this particular form, is acceptable in planning terms. The Housing response does not answer the amenity, parking, management, space standard, transport or legal concerns raised.

13. The Ecology consultee comments do not remove the need for a robust construction management response

The Ecology consultee is content subject to avoidance and mitigation measures and expressly recommends that a Construction Environment Management Plan (CEMP) be secured.

That recommendation reinforces rather than weakens local concern about the construction and refurbishment phase, especially given the known asbestos issues previously identified and the sensitivity of the neighbouring residential context. Accordingly, even the ecology response supports the position that the application, as currently presented, still depends on further management and control documentation to avoid harm.

14. The revised submissions still do not create enforceable planning control over future occupation

The Supporting Statement now says the Council will only place eligible homeless households, that the Home Office is not associated with the property and that non-UK citizens or those awaiting immigration decisions are not eligible for this Council accommodation.

That clarification may address some public concern, but it remains an operational statement, not a planning control. The planning system must assess the use sought on the face of the application and the enforceable planning framework. Unless the Council imposes precise and lawful conditions controlling the use, those statements do not resolve the planning concern that the actual occupation of the site may diverge from the assurances currently offered.

15. Conclusion

For all of the above reasons, the revised submissions do not overcome the objections already raised. On the contrary, they confirm that:

- the accommodation remains communal and management-dependent rather than genuinely self-contained;
- the applicant's claim that all units exceed minimum space standards is contradicted by the plans;

- the scheme still lacks the Management Plan on which it depends;
- parking overspill is effectively acknowledged by the applicant;
- the transport evidence remains incomplete and unreliable;
- the climate and sustainability case remains under-evidenced; and
- the proposal continues to rely on future operational assurances rather than a complete and policy-compliant planning submission.

My objection is therefore maintained in full. I respectfully request that this further representation is placed on the public file and fully addressed in the officer's report. The application should therefore be refused in full.

Yours faithfully,

