

An aerial photograph of a residential development. The houses are modern, with white walls and dark roofs. Some have orange-brown accents. They are arranged in a cluster with a central parking lot. A road runs along the bottom right, and a grassy area is on the left. The word 'laister' is overlaid in a large, white, serif font.

laister

PARTNERS IN PLANNING

RE: 86 Bedhampton Road, Havant, PO9 3EZ

Representations to Havant Borough Council Objection to
Application Reference APP/26/00182

April 2026

**Objection to Application Reference
APP/26/00182 at 86 Bedhampton Road,
Havant, PO9 3EZ**

Neighbour Representation

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1. Introduction

- 1.1. Laister Planning Limited (Laister) has been instructed by our client, [REDACTED] occupier of [REDACTED] to prepare and submit an objection against Havant Borough Council's planning application reference APP/26/00182. The description of development is:

"Two storey and single storey rear extension to accommodate 2No. flats on first floor and extension to existing commercial space at ground floor. Erection of two storey dwelling to rear of site with associated parking, refuse and cycle storage."

- 1.2. The commercial space is not defined in the description of development, whereas the redacted application form described the existing commercial use as a 'Barbers Class E'. In the main, the proposal therefore amounts to the development of 3x new dwellings (2x net), extension of a barbers, and associated development.
- 1.3. The application site comprises an area of land measuring some 0.05 hectares of land adjacent to the Old Bedhampton Conservation Area. Within 60m is the Grade II listed 'Bedhampton Arts Centre' (The Old School, List Entry: 1393209). Within 150m is the Grade II Listed 'The Golden Lion' (List Entry: 1091646).
- 1.4. Access to the site would appear to be from the Bedhampton Road. Because it is not apparent where access would be taken, there is a question on whether the application is valid which we explore in the next section. Any site visit will reveal that the Bedhampton Road is very busy, with commercial, residential, sui-generis (including pubs), and learning and non-residential institutions taking place upon it. Bedhampton Road provides access to various transport links, including bus stops and the Bedhampton Train Station. The Bedhampton Road acts as a main thoroughfare for emergency services to access the A3 and M27. While these lend to the site's sustainability, they also provide some transport challenges.
- 1.5. It will not be a surprise to the applicant that there are already significant parking issues locally.
- 1.6. The applicant has provided, among other documents, a: Design and Access Statement; Heritage Statement; and Arboricultural Implications Assessment and Method Statement. We will address those throughout this objection.
- 1.7. No Transport Technical Note, Transport Statement or Transport Assessment has been provided. In addition, no technical information on the additional impacts of intensified commercial activity on residential occupiers (existing and proposed) has been provided, nor has any information regarding the construction activities been provided. It may be that a noise impact assessment, lighting assessment, and construction management plan would be welcomed by the planning authority.



2. Matters of Objection

Validity

- 2.1. The planning application is supported by a location plan. The red line extends around a shape similar to a rectangular parcel of land, which does not include all of property 86 and 86a. The Town and Country Planning (Development Management Procedure) (England) Order 2015 (as amended) sets out what an application for planning permission must be accompanied by. Section 7, Part (1), subsection (c) (i) states:

“a plan which identifies the land to which the application relates;”

- 2.2. The Planning Practice Guidance Paragraph: 024 Reference ID: 14-024-20140306 states:

“A location plan should be based on an up-to-date map. The scale should typically be 1:1250 or 1:2500, but wherever possible the plan should be scaled to fit onto A4 or A3 size paper. A location plan should identify sufficient roads and/or buildings on land adjoining the application site to ensure that the exact location of the application site is clear.

*The application site should be edged clearly with a red line on the location plan. **It should include all land necessary to carry out the proposed development (eg land required for access to the site from a public highway, visibility splays, landscaping, car parking and open areas around buildings)** [my emphasis]. A blue line should be drawn around any other land owned by the applicant, close to or adjoining the application site.”*

- 2.3. The submitted location plan plainly does not identify the land to which the application relates in that there is no demonstrable access to the site, including access to a public highway or visibility splays. With that in mind, the planning application is not valid. On the assumption that a revised location plan is submitted, the red-line will be extended which amounts to a material change in the planning proposal. Re-consultation will be necessary in that eventuality. Furthermore, the applicant must serve notice on any party that owns that land.
- 2.4. As a matter of urgency, this representation requests that the Council confirm the validity of application reference APP/26/00182. Should planning permission be granted, the decision may be challenge at High Court on the basis of the Court of Appeal Case *R (Arriyo) v London Borough of Richmond upon Thames* [2024] EWCA Civ 960 wherein the precision and consistency of red lines on location plans was deliberated in detail.

Conflict with Development Plan Policies

- 2.5. No covering planning letter or planning statement has been submitted in support of the proposal. However, the Design & Access Statement refers to the proposals as being:

“designed in accordance with the National Planning Policy Framework (July 2021), The adopted Borough of Havant Local Plan (July 2014), all relevant supplementary planning guidance, supplementary planning documents, and



material considerations.”

- 2.6. The DAS is dated 30th November 2022. Unsurprisingly then, the development has been designed in accordance with an NPPF which is some 5 years out of date, was prepared by the previous Conservative Government, was amended in September 2023, December 2023, replaced in December 2024 by the Labour Government and updated in February 2025.
- 2.7. The fact that this proposal has been designed in accordance with a National Policy document that is so out of date is extremely alarming. This raises such significant concern that we must look closer at the Development Plan documents the applicant (who claims has review all relevant documents) has been inspired by.
- 2.8. On that, this representation submits that the Planning Authority should be aghast that the applicant has only considered The Havant Borough Local Plan (Allocations; July 2014) but not the crucial Havant Borough Core Strategy which was adopted in March 2011. Notwithstanding the DAS is dated November 2022, the Core Strategy had been part of the Development plan since 2011. The Core Strategy sets out the strategic direction and broad distribution of development for the Borough, including strategic sites and areas for development and protection. It also contains some Development Management policies. The proposed development is entirely ignorant of these policies. We now review the policy against the Core Strategy, before turning our attention to the Allocations plan.

Core Strategy

CS4 on Town, District and Local Centres

- 2.9. Policy CS4 generally supports proposals encouraging economic activity. It states that planning permission will be granted for appropriate town centre development proposals. Part 5 of the policy states they will:
- “Encourage high quality, mixed-use development in designated centres that retain active ground floor frontages.”*
- 2.10. Aerial imagery from 2022 (i.e. around the time the DAS was prepared) demonstrates that a substantial tree occupied the application site. The image below is from Google Earth Pro in 2022 with the tree identified in an annotated red circle:





Figure 1 Google Earth Pro: Aerial Image 2022

2.11. The image below is from 2024, demonstrating the tree has been removed.

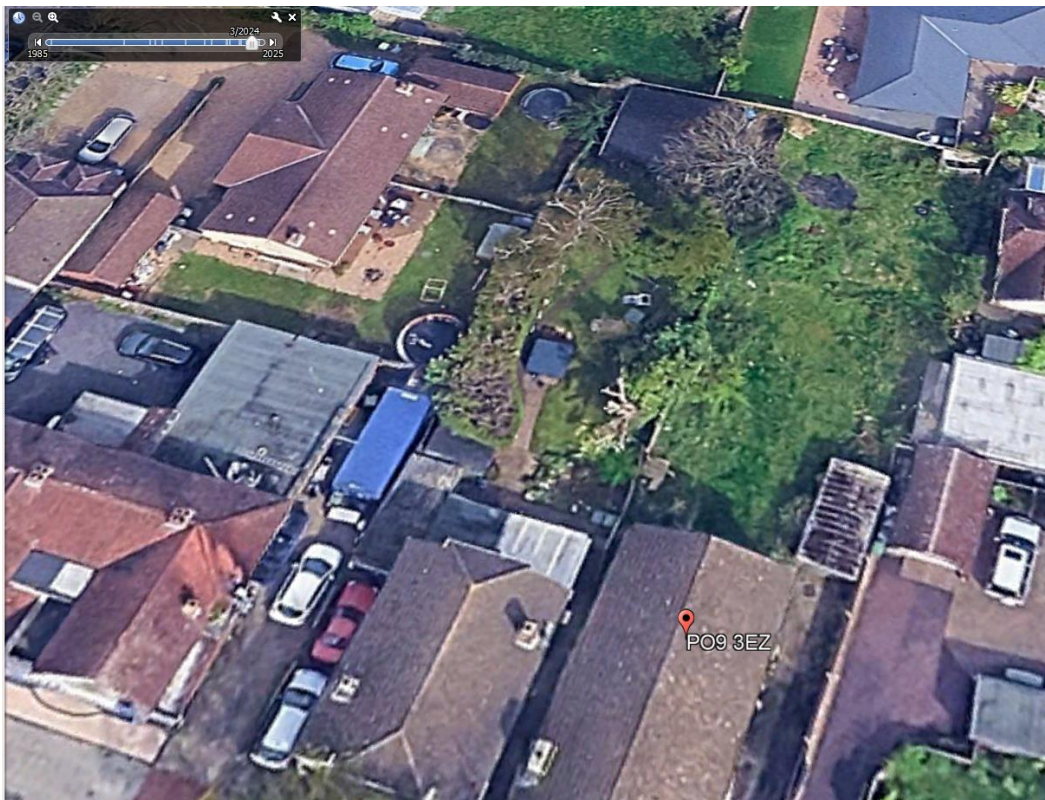


Figure 2 Google Earth Pro: Aerial Image 2024



- 2.12. The Arboricultural Implications Assessment and Method Statement, dated 10th May 2023, sets out at section 2.6:

“During my site visit, I noted that some trees shown on the provided land survey were no longer present on site.”

- 2.13. Bearing in mind that the DAS was prepared in 2022, and the tree appears to have been removed between 2022 and 2023, it stands to reason that the tree was removed in order to provide space for the proposed development put before the Council today. That is not high quality development, and the lack of compensatory planting or mitigation within the development proposal provides a conflict with Policy CS4.
- 2.14. In addition, the Arboricultural Assessment comments on Category A trees with works within the RPA. Section 3.1 of the report states:

“Of the total of five trees surveyed, all will be retained and no trees are scheduled to be removed to facilitate this development proposal. However, three trees will have activities arising from the development occurring within their RPAs.”

- 2.15. This representation welcomes the Council’s Arboriculturist / Tree Officer’s comments on whether works within the RPA of Category A trees is acceptable. It is difficult to see how habitat degradation amounts to high quality development.

CS6 Regeneration of the Borough

- 2.16. Policy CS6 sets out that planning permission will be granted for development which positively contributes by type of use and design and by its comprehensive approach to the social, economic and/or physical regeneration of the whole borough.
- 2.17. The policy is clear that all development proposals made under this policy must ensure that they benefit the borough socially, environmentally and economically.
- 2.18. The tree loss that has already occurred provides conflict with Policy CS6 on regeneration. The proposed development provides no compensation or mitigation for this substantial loss.
- 2.19. Furthermore, the impact of the proposed development on the spatial context has not been quantified in the supporting documents. There is no assessment on the impact of noise, traffic, building operations or lighting. There is no demonstration of the social, environmental or economic benefits, and there is very little articulation of the harm the proposal will cause. On that, it is impossible to know whether the proposed development provides a positive contribution, and without evidence to the contrary, the proposal cannot be found to comply with Policy CS6.

CS11 (Protecting and Enhancing the Special Environment and Heritage of Havant Borough)

- 2.20. Policy CS11 is clear that planning permission will be granted for development that:

4. Protects and where appropriate enhances the borough’s statutory and nonstatutory heritage designations by appropriately managing development in or adjacent to conservation areas, listed buildings, scheduled ancient



monuments, historic parks and gardens, archaeological sites, buildings of local historic or architectural interest."

- 2.21. The development proposal is accompanied by a 'Heritage Statement' prepared on the 14th April 2026. It is unclear who authored this statement, what professional accreditation or qualifications they might have (such as whether they are Chartered Members of the Royal Institute of British Architects or whether they are experienced in conservation or heritage planning). The 'Heritage Statement' provides a two page (being generous) assessment on the identification, significance and effects of/on a conservation area and two Grade II Listed Buildings.
- 2.22. Keeping in mind that the applicant sets out they have reviewed "*all relevant supplementary planning guidance, supplementary planning documents, and material considerations*" it is curiously silent on the 74 page 'Old Bedhampton Conservation Area Appraisal' dated September 2019. Merely within its summary at Page 4, any reader will recognise the following issues which are facing the Conservation area:
- Inclusion of recreational space within the traditional parkland setting of Bidbury Mead to be protected by Conservation Designation.
 - Erosion of character through the loss of historic and architectural features, use of non-traditional materials and unsympathetic additions.
 - Erosion of boundary features such as walls, gate piers and banks.
 - Loss of trees both within the public domain and the private garden setting.
 - Traffic, pedestrian and other forms of access cause conflict for the users of the predominantly narrow roads with limited pavements.
 - Volume of motorised traffic on narrow lanes and potentially use of narrow lanes to avoid traffic restrictions joining Bedhampton Road.
 - Lack of welcome/definition of Conservation Area boundary
- 2.23. The 'Heritage Statement' makes no recognition of any of these issues. However, the proposal has required the loss of a tree adjacent to the conservation area, an increase in traffic by intensifying an existing commercial use and providing two new dwellings, exacerbating the use of motorised traffic, and erosion into the conservation area boundary.
- 2.24. The proposed development does not protect the adjacent conservation area and it conflicts with Policy CS11.

CS16 (High Quality Design)

- 2.25. Policy CS16 explains that planning permission will be granted for development that is designed to a high standard, which helps to create places where people want to live, work and relax. All development should demonstrate that its design:

"1. Responds to, draws inspiration from and respects local context and:

e) The development does not cause unacceptable harm to the amenity of



neighbours through smell, the loss of privacy, outlook, noise and overlooking.”

- 2.26. This representation submits that it is not clear what form of visual impact the new Bungalow Chalet will impose upon neighbouring properties because the application documents have not carried out any assessment.
- 2.27. While this representation accepts that there is no right to a view, Policy CS16 plainly requires new development not to cause unacceptable harm to the amenity of neighbours through smell, loss or privacy, outlook, noise and overlooking.
- 2.28. In this case, there is no noise impact assessment setting out what disturbance can be expected from the intensified commercial use. There is no visual impact assessment identifying the outlook harm that will be inflicted upon number [REDACTED] or other neighbouring properties. There is no overlooking assessment illustrating what overlooking will be possible from the second story of the Chalet Bungalow into number [REDACTED] or neighbouring properties’ garden and private space, or as a result of the alterations to the flatted accommodation. Quite simply, without an assessment of the baseline and a comparison with the proposed development, it is impossible for the applicant to demonstrate there will be no unacceptable harm to the amenity of [REDACTED] or neighbouring properties. The proposal conflicts with Policy CS16.

Policy CS20 Transport and Access Strategy and DM13 (Car and Cycle Parking on Residential Development)

- 2.29. Policy CS20 sets out that development will be permitted that:
- “2. Does not increase congestion and promotes better use of existing transport networks.*
- 4. Provides transport management measures to ensure the safe and efficient operation of the strategic and local road network.*
- 6. Ensures that highway design responds positively to the characteristics of the area and delivers a high quality public realm for all users.”*
- 2.30. Policy DM13 requires that residential development will only be permitted where it provides car parking and cycle storage in accordance with the standards set out in the Residential Car Parking and Cycle Provision Supplementary Planning Document.
- 2.31. Havant Borough Council Parking Supplementary Planning Document, July 2016 (Partially updated in September 2019) requires the following parking provision:



TABLE 4A			
C3 Dwelling Houses – Vehicle Parking			
Size of dwelling \ Zone	Minimum Car Parking Requirement	Havant Town Centre	Waterlooville Town Centre
1 Bed Unit	1 space	Max 1 space	Max 1 space
2 Bed Unit	2 spaces	Max 1 space	Max 1 space
3 Bed Unit	2 spaces	Max 1 space	Max 2 spaces
4+ Bed Unit	3 spaces	Max 2 spaces	Max 2 spaces

Notes

Figure 3 Havant Borough Council Parking Supplementary Planning Document, July 2016 Table 4a

- 2.32. The proposal will provide 2 spaces, yet will increase the residential capacity to 3x dwellings, including 1x1 bedroom flat, 1x2 bedroom flat, and 1x2 bedroom house. The standards therefore require a minimum of 5 spaces. Only two spaces are proposed. The proposal is in direct conflict with Policy DM13.
- 2.33. As a result, people occupying/attending the site will therefore have to park elsewhere, possibly on the road. This does not comply with the requirements of Policy CS20. The proposal represents an increase in risk to the safety and efficiency of the local road network; and does not positively respond to the characteristics of the area. The development is, consequently, in conflict with Policy CS20.

Havant Borough Core Strategy Summary

- 2.34. The proposal conflicts with Policies CS4, CS6, CS11, CS16, CS20 and DM13. It is therefore no surprise that the applicant failed to cite the Havant Borough Core Strategy (March 2011) within their Design and Access Statement.

Havant Borough Local Plan (Allocations) July 2014

- 2.35. The main aim of the Allocations Plan is to allocate land to help deliver from 2013–2026. Therefore, it provides policies governing development at a strategic level. As such, there are relatively few policies relevant to the proposed development.

DM18 Protecting New Development from Pollution

- 2.36. Policy DM18 states:

“Planning permission will be granted for development provided that projected levels of air, noise, vibration, light, water or other pollution do not have significant negative affect on the amenity of future occupiers or users of the proposed development.”

- 2.37. It has been set out above that no information on noise or light has been provided in support of this application. The resultant harm in intensification of an existing commercial use has not been established, therefore it is impossible to understand what harm will be caused to future occupiers. This representation submits that air, noise, vibration, light and water assessments (in addition to a transport statement) must be provided to quantify the expected harm. Without those, the proposal cannot be found to



be in compliance with Policy DM18.

DM20 Historic Assets

- 2.38. Policy DM20 sets out that planning permission will be granted for development that conserves and enhances the historic assets of Havant Borough. Applications that affect, or have the potential to affect, heritage assets are expected to provide a Heritage Statement that:
- 1. Describe the significance of the asset and its setting, using appropriate expertise and where necessary original survey, at a level of detail proportionate to its significance and sufficient to understand the potential impact of the proposal.*
 - 2. Sets out the impact of the development on the heritage assets and mitigation that is proportionate to the impact and the significance of the heritage asset, including where possible positive opportunities to conserve and enjoy heritage assets.*
- 2.39. It has been noted above that we do not know who the author of the 'Heritage Statement' is, nor what qualifications they have to justify their professional position. In this case, the 'Heritage Statement' makes no reference to the National Planning Policy Framework or any guidance set out by Historic England. It appears that the 'Heritage Statement' has not been prepared by a relevant professional.
- 2.40. In carrying out an assessment of the site and its setting we might expect a heritage statement to demonstrate the evolution of the assets through a presentation of maps, historic map regression, and satellite imagery. Using this, a heritage statement might set out a scope for assessing the significance.
- 2.41. In setting out an Assessment of Significance, a heritage statement might set out a description of the asset, contributors to the significance of a listed building (including archaeology and evidential value; historic value; architectural and aesthetic value; communal value; and a contribution of the setting to significance).
- 2.42. In an assessment of impact we might expect a heritage statement to set out the planning proposal and its impact on the setting of the assets.
- 2.43. Historic England has volumes of Advice Notes and technical guidance – none of which appears to have been followed in this case.
- 2.44. The 'Heritage Statement' is therefore inadequate and appears to amount to nothing more than a marketing document.



3. Conclusion

- 3.1. Laister Planning Limited (Laister) has been instructed by our client, [REDACTED] occupier of [REDACTED] to prepare and submit an objection against Havant Borough Council's planning application reference APP/26/00182. The application is for the:

"Two storey and single storey rear extension to accommodate 2No. flats on first floor and extension to existing commercial space at ground floor. Erection of two storey dwelling to rear of site with associated parking, refuse and cycle storage."

- 3.2. The proposed development is not valid because the supporting location plan is deficient, in that no access to the public highway is shown. The Court of Appeal in *R (Arriyo) v London Borough of Richmond upon Thames* [2024] EWCA Civ 960 has set out how the precision and consistence of red lines is vitally important to planning applications. The red line plan must be amended, and if it is extended, a new period of consultation must take place and notice must be served on landowners.
- 3.3. The proposal is supported by an inadequate heritage statement, and a lack of technical supporting documentation quantifying the anticipated harm caused by intensifying an existing commercial use in conjunction with providing additional residential accommodation. There is similarly no assessment on transport impacts, noise impacts, lighting impacts, or overlooking impacts that may affect the neighbouring properties.
- 3.4. In order to secure an appropriate land area to provide this application, the applicant has felled a tree between 2022 and 2023. There is no recognition of this by the applicant, other than by the author of the Arboricultural Implications Assessment and Method Statement. No mitigation or enhancement is proposed.
- 3.5. The applicant has referred to the NPPF which was published by the previous Government, and they have not even referred to the most recent version at that time. Similarly, the applicant has entirely overlooked the Council's Core Strategy. It is apparent why – the proposal clearly conflicts with at least 6x Core Strategy Policies, in addition to at least 2x Allocations policies. Those include:
- CS4
 - CS6
 - CS11
 - CS16
 - CS20
 - DM13
 - DM18
 - DM20

- 3.6. On all of this, we respectfully request that planning permission is refused.



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