

17th February, 2026



Development Management,
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BY EMAIL

Dear Development Management team,

37 Dene Court, Holman Close, Cowplain, Hampshire, PO8 8HD

On behalf of our client, My Future Living, we submit this application for a change of use of Housing Managers Flat to be used as an age restricted accommodation (over 55).

My Future Living are the market leading UK retirement rentals company, with over 2,000 high quality apartments designed exclusively for the over 55s. My Future Living offer good quality, age-exclusive rental properties, in modern purpose-built developments across the country. If you have any questions or wish to discuss further, please do not hesitate to contact me.

The Proposed Development

Dene Court comprises 37no. independent retirement living 1-bed and 2-bed flats for the over 55's. It offers independent living for its residents, with each flat having its own kitchen, bathroom and living area. Additional assistance and facilities are also available with a Careline Alarm Service. For reasons set out below, this application is submitted for a change of use of the Housing Manager's Flat to create 1no. age restricted 2-bedroom flat (C3).

Dene Court does not provide care services, however provides support to enable residents to live independently, including a 24-hour alarm system. Due to the way in which Dene Court is managed, the limited level of assistance required and the ability of the residents to live independently, there is no requirement for a live-in manager. Additionally, the presence of the flat increases the running costs of the site, which in turn increases the service charge for the residents.

In response to residents raising concerns over this service charge, My Future Living have been reviewing their portfolio and where appropriate are seeking to reutilise the Housing Manager's Flat where they are no longer required. As part of this review, My Future Living have held

ballots amongst residents to determine which properties no longer require a Manager's Flat and are seeking to reutilise the flat where this is the case.

The Site is a singular enclosed flat and is fully hard surfaced. Due to this, the proposal should be considered to be under the De Minimus exception from providing BNG since there is less than 25sqm of habitat within the Site. This results in there being no need to provide Biodiversity Credits for this application.

The Site is situated within Flood Zone 1 and does not experience any surface water flooding. Due to this, and the nature of the development, it is considered that a Flood Risk Assessment would not be required for the application.

Age Restricted Dwellings

It must be recognised that 'older people' are not a homogenous group. As recognised within Annex 2 of the NPPF, which defines older people as those 'over and approaching retirement age' this incorporates a range of 30 to 40 years and can include those that are 'active and newly retired through to the frail and very elderly'. As such, the requirements for housing are very different and the need for live-in assistance and a Warden's flat can vary significantly across different homes.

Policy CS9 'Housing' of the Havant Borough Core Strategy sets out how planning permission will be granted for housing proposals that provide accommodation for the aging population which takes account of the need to provide a variety of care needs and flexibility to accommodate different requirements of aging care.

There has been some debate over the use of C2 and C3 units to provide age-restricted accommodation, and the differences have been well tested through appeals and high court decisions. One prominent example is *Leelamb Homes v Maldon District Council*, which determined that where two or more hours of care are provided, it is generally accepted to fall under a C2 classification. In addition, it is considered that receipt of care is an occupancy condition of C2 units, however not of C3 units. In accordance with these definitions, it is concluded that the flats within Dene Court fall under a C3 Sheltered Housing definition, rather than a C2 nursing home, and therefore the change of use from a Wardens flat, to an age restricted dwelling will work to align with all the existing flats.

In the case of Dene Court, 24-hour assistance is available through a Careline Alarm Service, however, residents live independently, with no requirement for a 'live-in' manager. In addition to the justification related to the on-going operation and management of Dene Court, the application will result in the added benefit of an otherwise un-occupied dwelling being utilised and brought back into operation with the creation of 1no. 2-bedroom age restricted dwelling, to compliment the other flats in the building.

We trust the information submitted is sufficient to support this application and enable the Council to determine it, however, should you require anything further, please do not hesitate to contact me.

Yours Sincerely,



Lucy Topp BA (Hons)
Assistant Planner