

FORMAL OBJECTION TO PLANNING APPLICATION APP/26/00065

Site: 1 Ferndale, Waterloooville, PO7 7NZ

Proposal: Change of use of four self-contained two-bedroom flats to a nine-bedroom sui generis HMO

Objector: [REDACTED]

Dear Planning Officer,

I am writing to formally object to planning application **APP/26/00065**.

I am the owner and occupier of [REDACTED]
the application site and is directly affected by the [REDACTED]
[REDACTED]

Having reviewed the submitted **Proposed Floor Plans P007, Proposed Site Plan P003, Occupancy Calculation Statement, Design & Access Statement and the Northwood Portsmouth occupancy confirmation**, I am concerned that the application has not adequately demonstrated that the proposed large nine-bedroom HMO can operate without causing unacceptable harm to neighbouring residential amenity.

My objection is not to HMOs or their occupants in principle. It relates specifically to the **scale, configuration, intensity and operational characteristics of this particular development, and its relationship with established neighbouring homes and gardens**.

1. The proposal materially changes the nature and pattern of occupation

The applicant's own evidence confirms that the existing four flats are **currently occupied by nine people**:

Flat A – 1 person
Flat B – 2 persons
Flat C – 3 persons
Flat D – 3 persons

Total actual existing occupancy: 9 persons.

The proposed HMO is also stated to accommodate **nine persons, with one person per bedroom**.

However, similar headline population numbers do not demonstrate that the planning effects of the two uses are equivalent.

The existing nine residents are distributed across **four self-contained households**.

The proposed development would instead comprise **nine individually occupied HMO bedrooms**, each with its own en-suite and kitchenette, supported by a very substantial

53.41 m² shared kitchen/living/dining area, a separate **14.24 m² gym**, shared access arrangements and communal external amenity space.

This represents a materially different form and pattern of residential occupation.

Nine independent room lettings can reasonably generate different patterns of commuting, arrivals and departures, visitors, deliveries, parking, use of communal facilities and outdoor social activity compared with four self-contained households.

I therefore request that the Council assesses the proposal on the basis of its **actual operational characteristics**, rather than concluding that there can be no intensification merely because both the existing and proposed uses currently involve nine residents.

2. Conflicting occupancy arguments within the application

The submitted documents use three materially different measures of existing occupation.

The Northwood Portsmouth letter dated 17 April 2026 confirms **nine actual residents**.

The Occupancy Calculation Statement subsequently uses a generic calculation of **2.4 persons per dwelling**, resulting in a theoretical figure of **9.6 residents**, before comparing this with nine proposed HMO occupants.

The Design & Access Statement goes further and states that the four existing flats could potentially accommodate **12–16 people**.

These figures serve different purposes and should not be conflated.

The figure of **9.6 persons is clearly a statistical calculation rather than evidence of actual occupancy**, while the figure of 12–16 residents represents a hypothetical potential occupancy rather than evidence of the current use of the property.

I acknowledge that the lawful occupation of the existing flats could vary over time. However, a theoretical maximum occupancy should not be treated as evidence that the planning effects of the proposed HMO would be less intensive.

The Council should distinguish clearly between **actual occupancy, nutrient-neutrality modelling and hypothetical occupancy capacity** when assessing residential amenity.

3. The applicant expressly proposes social use of the rear garden



The applicant's Design & Access Statement specifically confirms that residents would have use of the **rear garden and external amenity areas for relaxation and social activity**.

Drawing P003 shows extensive landscaped grounds surrounding and extending behind the property. However, it does not identify a clearly defined communal external area or demonstrate how communal activity will be kept away from neighbouring residential boundaries.

[REDACTED]

the application site.

The effect on neighbouring amenity therefore cannot be assessed simply by considering the distance between the main HMO building and neighbouring houses.

Permission would allow **nine independent HMO occupants to make communal social use of extensive external grounds**, including areas close to neighbouring gardens.

Potential effects include group conversations, visitors, smoking, social gatherings and activity during evenings and weekends.

I am not suggesting that future residents will necessarily behave unreasonably. The point is that **communal external use by nine separately occupying adults is an inherent operational characteristic of the proposed development and requires proper assessment.**

The submitted documents do not appear to establish:

- a defined principal outdoor communal area;
- any restriction on communal activity close to neighbouring boundaries;
- designated external seating or smoking areas;
- appropriate hours for communal outdoor activity;
- acoustic boundary measures; or
- a detailed management procedure for dealing with noise or disturbance arising from communal external use.

I therefore request that the Council expressly assesses the external amenity arrangements under **Policy CS16**, including their effect on [REDACTED] and other neighbouring properties.

4. No adequate noise assessment has been demonstrated

The proposed floor plan includes a **53.41 m² communal kitchen/living/dining area specifically intended to facilitate social interaction**, together with a **14.24 m² residents' gym**.

The Design & Access Statement indicates that the gym is intended to provide residents with the opportunity to exercise conveniently before or after work.

Gym equipment can generate impact noise and vibration, while a large communal social area can produce a concentration of activity different from that associated with four separate flats.

The application also expressly proposes social use of the rear garden.

Despite these factors, I have not identified a substantive Noise Impact Assessment addressing the effect of the proposed HMO on neighbouring residential properties.

Internal acoustic insulation measures intended to provide satisfactory living conditions for HMO residents do not necessarily demonstrate that **noise emitted from the premises or garden will not adversely affect neighbouring residents**.

I therefore request that **Environmental Health is formally consulted** and that consideration is given to requiring an appropriate Noise Impact Assessment before the application is determined.

The assessment should include the communal kitchen/living/dining area, gym, shared access arrangements and external amenity areas, including their use during evening and night-time periods.

5. The proposed use should not simply be equated with a large family dwelling

The Design & Access Statement suggests that the proposed property would function similarly to a large family home.

However, the submitted plans demonstrate a materially different configuration.

Each of the nine bedrooms has its own **en-suite and kitchenette**, while residents would additionally share the substantial communal kitchen/living/dining area, gym and garden.

The development also provides individual postal arrangements and dedicated parking provision associated with the individual rooms.

These features indicate a high degree of independent occupation alongside substantial shared facilities.

This does not automatically make the use unacceptable, but it does mean that the Council should assess the proposal as the **large sui generis HMO actually proposed**, rather than applying assumptions based on the behaviour or operation of a single family household.

6. Reliance on occupation by “working professionals”

The application repeatedly refers to the accommodation as being intended for **working professionals**.

That may be the applicant's preferred market, but planning permission runs with the land.

Unless secured through an appropriate and enforceable planning mechanism, there is no guarantee that all future occupants will fit a particular employment profile, lifestyle or working pattern.

The impact assessment should therefore be based on the authorised use as a **nine-person HMO**, rather than assumptions concerning the type of individuals who may occupy it.

7. Parking and vehicle movements require proper assessment

I acknowledge that drawing P003 provides significant off-street parking and that this is preferable to reliance solely on surrounding streets.

However, the Design & Access Statement anticipates that many residents may use private vehicles for commuting and proposes **nine resident parking spaces**.

The applicant compares this with a theoretical existing scenario of two vehicles per flat, giving eight vehicles.

On the applicant's own assumptions, the proposed HMO therefore provides for **nine resident vehicles**, in addition to possible visitors, deliveries and servicing requirements.

More importantly, nine unrelated adults are likely to have **independent daily movement patterns**, rather than travelling as four households.

The Council should therefore verify that the proposed parking arrangement provides nine genuinely usable spaces, adequate manoeuvring space, safe access and appropriate arrangements for visitors and servicing, without resulting in unacceptable overspill parking on surrounding roads.

8. Loss of four self-contained residential units should be expressly assessed

The existing property comprises **four self-contained two-bedroom flats**.

The proposal would remove those four independent dwellings and replace them with one large sui generis HMO.

I recognise that the proposed use would continue to provide residential accommodation. Nevertheless, the development involves the loss of four self-contained units from the existing housing stock.

I request that the officer's report expressly considers this change against the relevant housing policies, including the principles contained within **Policy CS9**, rather than treating the proposal simply as a neutral residential change of use.

9. Character of the area

The applicant's own Design & Access Statement acknowledges that there are **no existing HMOs along this section of Ferndale**.

I accept that this fact alone is not a reason to refuse planning permission.

However, it is relevant to the assessment of the scale and nature of this particular proposal.

The Council should consider the cumulative operational characteristics of:

- nine independently occupied rooms;
- nine associated parking spaces;
- individual kitchenettes and en-suites;
- individual postal arrangements;
- the 53.41 m² communal social area;
- the residents' gym; and
- communal social use of the extensive garden.

These characteristics should be assessed against the established residential character and amenity of the surrounding area under **Policy CS16**.

10. Need for a site visit from [REDACTED]

Drawing P003 provides a street-scene assessment from Ferndale.

However, the principal concern for properties behind the site is not necessarily the appearance of the building from Ferndale, but the relationship between the **extensive communal grounds and the [REDACTED]**

I therefore specifically request that the case officer **visits [REDACTED] before determining the application**.

I would be pleased to provide access so that the officer can view first-hand the relationship between [REDACTED] and the application site's [REDACTED].

Conclusion

Having reviewed the applicant's supporting material, I do not believe the application currently demonstrates that the proposed large HMO can operate without causing an unacceptable impact on neighbouring residential amenity.

The relevant comparison is not simply:

9 existing residents versus 9 proposed residents.

It is:

nine people currently distributed between four self-contained households versus nine independently occupying adults sharing a purpose-designed large communal living area, gym and extensive garden expressly intended for social use.

That represents a materially different pattern of occupation and should be assessed accordingly.

I therefore respectfully request that **APP/26/00065 is refused unless the Local Planning Authority is satisfied, on the basis of adequate evidence, that the development complies with the relevant residential amenity, noise, parking and housing policies.**

If the Council is nevertheless minded to grant permission, I request that consideration is given to robust and enforceable planning conditions securing, where legally appropriate:

- a maximum occupancy of **nine persons**;
- no more than **one person per approved bedroom**;
- retention of the development as nine bedrooms only;
- prevention of the conversion of the communal kitchen/living/dining area, gym or other rooms into additional sleeping accommodation without further planning permission;
- retention and reinforcement of appropriate  landscaping;
- appropriate acoustic mitigation;
- controls over external lighting;
- clearly defined and appropriately managed external communal amenity areas; and
- an enforceable management arrangement dealing with matters capable of affecting neighbouring residential amenity.

The applicant has expressly based its planning case on **nine residents at one person per room**. If the Council assesses the development on that basis, that level of

occupancy should be secured so that the intensity of use cannot subsequently increase without further planning consideration.

Please ensure that this representation is placed in full on the planning file for **APP/26/00065** and taken into account before the application is determined.

I would also be grateful if the case officer could contact me to arrange a [REDACTED] [REDACTED] prior to determination.

Footnote – Neighbour Notification

I also wish to formally record that, despite [REDACTED] [REDACTED] neither I nor my household has received a neighbour notification letter or any other written notification from Havant Borough Council regarding planning application **APP/26/00065**.

Given the direct relationship [REDACTED] and the potential implications of the proposal for our residential amenity, I am concerned that we were not made aware of the application through the Council's neighbour notification process.

I understand that the Council's Statement of Community Involvement provides for neighbour notification letters to be sent to occupiers of premises or land adjacent to an application site.

I would therefore be grateful if the Council could confirm:

- whether [REDACTED] was included on the neighbour notification list for this application;
- if so, the date and method by which notification was issued; and
- if not, why an adjoining property was not notified.

I appreciate that the question of notification is separate from the planning merits of the application. Nevertheless, given that [REDACTED] I ask that this matter is investigated and that my representation is accepted and considered in full before any decision is made.

I would also ask that I am notified of any **material amendments, further consultation or other significant changes to the application** during the remainder of the determination process.

Yours faithfully,

[REDACTED]

