

Dear Planning Officer,

I object to this application. I have read the full set of documents on the planning portal.

My concerns are about the reliability of the submission and the scale and character of what is proposed, not about HMO residents as people.

Before turning to the merits, the Council should refuse or decline to determine this application on the state of the submission itself. The burden is on the applicant to show that the development is acceptable, and the Council can only assess what has actually been submitted. On this file:

- the only two elevation drawings are of a different house in a different county (point 1 below);
- the description of development on the form and on the neighbour notification omits every external work the scheme includes (point 2);
- the application form contradicts the Design and Access Statement on pre-application advice, access, waste, drainage, protected species, the date of conversion and the identity of the applicant (point 8);
- the Habitats Regulations case rests on a one-page assertion with no nutrient budget, so the Council cannot reach the "no adverse effect" conclusion the law requires (point 4);
- the tree evidence was written for a different scheme and says parking is unchanged when the form doubles it (point 6);
- no highway assessment has been offered at all (point 5).

Individually each of these would need correcting. **Together they mean the Council does not have an accurate description, accurate drawings, a reliable form or a lawful habitat assessment.** An application in that state cannot be approved, and a permission granted on it would be open to challenge.

The submitted paperwork is not capable of supporting a grant of permission. The proper course is to refuse it, or to require a fresh, accurate submission and a fresh consultation.

1. The elevation drawings are for a different building

The documents listed as "Existing Elevations" (drawing P004) and "Proposed Elevations" (drawing P005) both carry a title block reading "Loft Conversion And Rear Extension", client [REDACTED] address "9 Gorse Hill Rd, Poole BH15 3QH". They show a detached house in Dorset. There are no elevations of 1 Ferndale on the file at all.

This matters because the Design and Access Statement proposes a front porch, white render, timber-effect cladding, dark grey window frames, replacement windows with opaque lower panes, a new rendered boundary wall and automatic gates (pages 3, 9, 11 and 13). None of that can be assessed, and none of it has been consulted on, without drawings of the actual building. I ask that the application is treated as invalid until correct elevations are supplied, and that neighbours are re-notified when they are.

2. The description of development does not match the proposal

The application form describes the scheme as "All works within the property" and answers "No" to any new or altered vehicle access. The Design and Access Statement describes a new boundary wall, automatic gates set back 5.5 metres, a porch, re-cladding, a bin enclosure, eight cycle sheds and a car park enlarged from three or four spaces to nine (form question 10). **Neighbours were notified on the basis of a description that omits every external change.** The description should be corrected and the consultation re-run.

3. The "HMO" is nine self-contained studios in all but name

Each of the nine rooms has its own en-suite and its own kitchenette with sink, hob, storage and space for a microwave (D&A page 7), its own lockable post box (page 9) and its own allocated parking bay (page 14). The Statement itself calls them "units". On top of that sits a 53 square metre communal kitchen, lounge and dining room and a gym. This is a materially more intensive form of occupation than four households in four flats: nine independent adults with nine independent routines, plus communal facilities designed to draw them together in the evenings. I ask the Council to assess the proposal on what the plans show, and to consider **whether it is in truth nine dwellings rather than one HMO**, which would change the nutrient neutrality, parking and CIL assessments.

4. The occupancy evidence is inconsistent and the nutrient assessment contains no calculation

The application relies on **four different figures for existing occupancy**: 9 actual

residents (Northwood letter of 17 April 2026), 9.6 (Occupancy Calculation Statement), "12 to 16" (D&A page 2) and "two cars each", meaning eight vehicles (D&A page 13). Each is used wherever it helps the argument. The "Bespoke Nitrogen Assessment" is a single page of assertion with no nutrient budget, contrary to the Council's Nutrient Neutrality Position Statement, which requires the Council's occupancy calculator and a budget. The Council cannot lawfully conclude no adverse effect on the Solent sites on this evidence.

Every proposed room is between 14.0 and 15.7 square metres, which is **double-room size under HMO licensing standards. Nothing in the application prevents 18 residents.** The applicant's entire case rests on nine people, one per room, and on "working professionals". Permission runs with the land, so if the Council is minded to approve, both must be conditioned (see below).

5. Parking and highway safety have not been assessed

The Design and Access Statement says on page 13 that "we believe highways do not need to access the safety". The applicant expects "many occupants will rely on private vehicles to commute" (page 12), provides nine allocated bays and no visitor spaces, and admits that the visibility splays Highways might require "may have implications for nearby tree root protection areas". The Council's Parking SPD requires 20 percent unallocated visitor parking on all but small developments. The applicant's own doorstep survey (page 6) found that on-street parking caused by 1 Ferndale was the most common complaint from neighbours. I ask that Hampshire County Council Highways is consulted on the access, gates, splays, turning and visitor parking before determination.

6. The tree documents were written for a different scheme and contradict the plans

The Arboricultural Tree Constraints Plan is **dated 7 November 2024 and was prepared for "the proposal to redevelop 1 Ferndale", the earlier three-house scheme that pre-application advice rejected.** Its method statement deals with foundations within root protection areas and includes a pile-and-beam detail that has no relevance to a change of use. The Arboricultural Impact Assessment states "No changes to parking layout or extent", yet the application form more than doubles the parking and the Design and Access Statement says removing the caravans "enables a more efficient parking layout". The proposed site plan P003 puts a row of eight bays directly against the protected oaks (T1 to T6, TPO group G1) on the western boundary. The Council's Tree Officer should check every bay and the new wall against the root protection areas, and a scheme-specific tree protection plan should be required.

7. Impact on the rear gardens of Cavendish Drive

The Design and Access Statement expressly offers the rear garden and external space to residents for "relaxation and social use". The rear grounds run up to the Cavendish Drive boundary beneath the TPO oaks (T18 to T27). At present four households use that garden. The proposal would give nine unrelated adults a communal outdoor space, with a gym and a 53 square metre social room feeding into it, without any defined seating area, hours, lighting or boundary treatment shown on the plans. That is a real change in evening and weekend activity for the homes behind, and the application does not address it. I ask the Council to assess this under Policy CS16 and to visit the site from the Cavendish Drive side, not only from Ferndale.

8. The application form is unreliable

The form says no pre-application advice was sought; the Design and Access Statement describes it. **The form says there are no arrangements for recyclable waste; the Statement describes recycling bins.** The form ticks "sustainable drainage system" and "existing watercourse" for surface water; the flooding statement says drainage is unchanged. The form says no protected species; the Statement concedes the porch may need a bat survey. The form says the building was converted in 2005; the tree report says 2009. The net change in residential units is entered as "20m2". The planning form names [REDACTED] as applicant with a sole-ownership certificate, but CIL Form 1 names [REDACTED] as applicant and the letting agent writes to "Homes for Hampshire". The Council should satisfy itself that the ownership certificate is correct, because an incorrect certificate goes to the validity of the application.

9. Loss of four homes and the absence of any HMO policy

Four self-contained two-bedroom flats would be lost from the housing stock in exchange for one sui generis unit. The Statement admits there are no HMOs on this part of Ferndale. Havant has no HMO policy, no Article 4 direction and no density cap, so this decision is the only control there will ever be. I ask that the loss of four dwellings is weighed under Policy CS9 and that the character impact is weighed under Policy CS16.

Requests

1. I ask that the application is refused, or at minimum not determined until correct elevations are supplied, the description is corrected, neighbours are re-consulted, and Highways, the Tree Officer, Environmental Health and the Council's ecologist have all commented.

2. If the Council is nonetheless minded to approve, I ask for conditions securing: a maximum of nine occupants and one person per room; no conversion of the gym, communal room or any other space to further bedrooms; retention of the communal kitchen and living space; a management plan covering external amenity use, lighting and noise; a defined external amenity area away from the Cavendish Drive boundary; retention and protection of all boundary trees and hedges; nine parking spaces retained in perpetuity; and no occupation until the arboricultural and drainage details are approved.
3. Can you also confirm the sending of a neighbour notification letter for this application especially to the residence of the Cavendish Drive properties.

Please record this objection in full on the planning file, confirm receipt, and notify me of any amended plans or further consultation. I would also ask the ward councillors to consider calling this application into the Planning Committee given the errors described above.

Regards,

