Dear Planning Officer,

I would like to submit a further representation following the comments made by **Harry Mitchell CMLI, Chartered Landscape Architect**, on behalf of Havant Borough Council's Landscape Team on 1 October 2026.

Mr Mitchell states:

“The proposals are not deemed to have any detrimental impact on the character of the area given the changes are predominantly internal.”

I respectfully question whether the fact that the physical alterations are predominantly internal is sufficient to conclude that there will be no detrimental impact on the character of the area.

The concern of residents is not simply what the property will **look like**, but how it will **operate and be used**.

This application proposes changing four self-contained flats into a nine-room HMO, with nine independently occupied rooms, a substantial communal living area, a residents' gym and communal use of the outside space.

Those changes may be largely internal in construction terms, but their potential effects are not necessarily internal. The proposed use could result in nine independent patterns of arrivals and departures, vehicles, visitors, deliveries and use of communal facilities and the garden.

I would therefore respectfully ask **Mr Mitchell and the Planning Officer to consider whether the operational characteristics of this development could affect the established residential character of Ferndale**, rather than assessing character solely by reference to the extent of external physical alterations.

I would also ask that particular consideration is given to the communal use of the garden. This is clearly an external element of the proposal and could directly affect neighbouring properties and the residential environment surrounding the site.

I appreciate that Mr Mitchell's comments are made from a landscape perspective and do not represent a determination of the application as a whole. However, given the strength of his conclusion regarding the “character of the area”, I believe it is important that the distinction between **visual change and change in the character and intensity of use** is properly considered.

Please add this representation to my existing objection to **APP/26/00065** and ensure it is taken into account before the application is determined.

Kind regards,

[redacted]