

Flats and 9 Multi-Occupancy Units at 1 Ferndale, Waterlooville, PO7 7NZ

Planning Application Number: APP/26/00065

Objection raised by: [REDACTED]

I wish to register my **strong objection** to the above planning application. The proposal represents a significant and harmful intensification of use within a quiet suburban family area, and it conflicts with several key planning policies, national guidance, and established principles of good planning.

The proposal is contrary to the Havant Borough Council Local Plan policies relating to the following:

Sustainable residential development – The scale and intensity of the proposed multi-occupancy units (HMOs) is not compatible with the surrounding low-density family housing.

Loss of Family Housing in a Sustainable Family Location

The proposal would result in the loss of four family dwellings within an established residential area that benefits from access to highly regarded schools, local services, public transport links and community infrastructure. The existing dwellings represent an important part of the local family housing stock and their conversion to nine HMOs would significantly alter the balance of housing provision in the area.

The location is inherently sustainable for family occupation. Families are drawn to the area because of its proximity to schools, recreational facilities and everyday services. The removal of family housing from such locations is contrary to the objective of creating balanced and sustainable communities and risks reducing housing choice for future family households seeking to live within local school catchment areas.

The proposal conflicts with the aims of **Policy CS9 (Housing)** of the Havant Borough Core Strategy, which seeks to ensure that housing provision reflects local needs and contributes towards the creation of balanced communities. The loss of family homes to a more intensive shared housing use fails to meet this objective by reducing the availability of accommodation suitable for family occupation.

The proposal also conflicts with **Policy CS16 (High-Quality Design)**, which requires development to respond positively to local character and contribute towards creating sustainable communities. Replacing four family dwellings with nine HMOs introduces a housing form and intensity of occupation that is materially different from the existing residential pattern and community structure.

Furthermore, **Policy DM1 of the Havant Borough Allocations Plan** requires development to be of a high-quality design that respects and enhances the character of the surrounding area and does not adversely affect the amenity of neighbouring occupiers. The cumulative loss of family housing and introduction of intensive multi-occupancy accommodation is not consistent with maintaining the established residential character of this family-oriented neighbourhood.

The National Planning Policy Framework also emphasises the need to support strong, vibrant and healthy communities through the delivery of a sufficient range and mix of homes to meet

the needs of present and future generations. The permanent loss of four family homes in an area of high demand for family accommodation, particularly one served by good schools, undermines this objective.

While HMOs have a role in meeting housing needs, this must be balanced against the need to retain family housing in sustainable locations. In this case, the proposal would result in the net loss of four family homes in an area specifically valued by families, replacing them with a high-density form of accommodation that does not contribute to maintaining a balanced housing stock. The proposal should therefore be considered contrary to the objectives of the NPPF, Policy CS9, Policy CS16 and Policy DM1, and represents an unsustainable form of development that fails to support the long-term housing needs of the local community.

Additional Points

Given that the proposal removes four family homes and replaces them with nine HMOs, the Local Planning Authority should require clear evidence of an identified local need for this scale of HMO accommodation and demonstrate why that need outweighs the loss of established family housing stock within a neighbourhood characterised by family occupation and supported by local schools. This planning balance has not been adequately justified within the application.

HMOs and Their Typical Role in the UK Housing Market

I recognise that Houses in Multiple Occupation (HMOs) play an important role in the UK's housing market by providing accommodation for a range of individuals who may not require or wish to occupy traditional family housing.

HMOs are most commonly encouraged in locations where there is a demonstrable demand for shared accommodation, such as town centres, university locations, employment hubs and areas with good access to public transport. Local authorities often seek to ensure that HMO provision is carefully balanced against the need to retain family housing and maintain mixed, sustainable communities.

In the context of this proposal, the issue is not whether HMOs are an appropriate form of housing in principle, but whether the conversion of four family homes into nine HMOs within a family-oriented suburban area, served by good schools and currently without a concentration of HMOs, represents a sustainable and balanced form of development that meets the long-term needs of the local community.

Waterlooville is not a university city nor is it an employment hub and does not meet the criteria. In comparison, Portsmouth meets this criteria with its university, student population, NHS employment at QA Hospital and St Mary's Hospital and good transport links with trains and good bus services.

Sustainable residential development – Recognising Public Benefit

The applicant presents the proposal as an improvement by increasing the number of available residential units from four family dwellings to nine HMO bedrooms aimed at professional occupants. However, the increase in the number of units alone should not automatically be regarded as a planning benefit.

The proposal would result in the loss of four self-contained homes capable of accommodating families and replacing them with a more intensive form of occupation. Whilst this increases the number of lettable rooms, it does not necessarily address an identified housing need within the

area, nor does it provide additional family accommodation in a location particularly well suited to family households due to the proximity of good schools and local amenities.

Furthermore, the scale of intensification raises questions as to whether the primary driver of the scheme is the delivery of a genuine community benefit or the maximisation of rental income from the site. The conversion of four homes into nine HMO bedrooms significantly increases the site's income-generating potential while transferring the associated impacts of higher occupancy, parking demand, traffic movements, waste generation and residential disturbance onto the surrounding community.

The planning system should assess whether the proposal delivers sustainable development and a demonstrable public benefit, rather than simply facilitating a more profitable use of the land. In this case, the substantial loss of family housing, combined with the intensified use of the site and associated impacts on neighbours, suggests that the principal beneficiary of the proposal would be the landowner rather than the wider community.

Accordingly, the Local Planning Authority should carefully consider whether the claimed benefits of providing additional HMO accommodation genuinely outweigh the harm arising from the loss of established family housing, increased pressure on local infrastructure and the erosion of the area's established residential character.

Financial Viability

The applicant argues that the existing four flats are no longer financially sustainable, stating that reduced rental income does not meet ongoing mortgage and maintenance costs, creating a risk that the property could fall into disrepair. However, insufficient evidence has been provided to demonstrate that conversion to a 9-bedroom HMO is the only viable solution.

A more proportionate and appropriate approach would be to invest in the modernisation and upgrading of the existing flats. Refurbished and energy-efficient self-contained flats would be attractive to a much wider range of occupants, including young professionals, key workers, couples, small families and downsizers. This broader appeal could increase rental demand and rental income without requiring the significant intensification of use associated with a large HMO development.

The applicant has not demonstrated that alternative options, such as refurbishment, reconfiguration or improvement of the existing accommodation, have been fully explored or assessed. Nor has sufficient evidence been provided to show that the existing flats are incapable of generating a reasonable return once upgraded to modern standards.

Whilst the risk of a building falling into disrepair is a relevant consideration, this risk does not automatically justify a development that results in the loss of family housing, increased pressure on parking and local infrastructure, intensified occupation and harm to residential amenity. In the absence of robust viability evidence demonstrating that refurbishment of the existing flats is not feasible, little weight should be given to the claim that the proposed HMO scheme is necessary to secure the future of the property.

Pre-Application History Demonstrates an Ongoing Attempt to Maximise Site Intensity

The applicant states that pre-application advice was sought for the redevelopment of the site to provide three family dwellings, but that this approach was not supported by the Local Planning Authority due to impacts on protected trees, ecology and neighbouring amenity. Whilst the

applicant presents the current HMO proposal as a response to those concerns, the planning history suggests a continuing attempt to maximise the development potential and income-generating capacity of the site rather than to deliver a scheme that is genuinely appropriate to its constraints.

The fact that a proposal for three family dwellings was previously pursued indicates that the applicant had already sought to intensify the site's residential use beyond its current form. The Local Planning Authority concluded that the site could not accommodate that level of redevelopment without unacceptable impacts on protected trees and neighbouring properties. Rather than demonstrating that the site is unsuitable for family housing, the pre-application response simply demonstrates that the particular scale and layout proposed was excessive for the constraints of the site.

The subsequent proposal to convert four existing flats into a 9-bedroom HMO represents a different form of intensification, but one that remains focused on maximising the site's occupancy and rental yield. Whilst the building footprint may remain unchanged, the number of occupiers, vehicle movements, deliveries, visitors, waste generation and overall activity associated with the site would increase substantially. The proposal therefore seeks to maximise the intensity of use within the existing building envelope after an earlier attempt to maximise development through redevelopment was not supported.

Importantly, the rejection of three family dwellings does not automatically justify the creation of nine HMO bedrooms. A more logical conclusion is that the site has inherent physical and environmental constraints that limit its capacity for intensification. Those constraints remain relevant regardless of whether the additional occupation is achieved through new buildings or through a higher-density HMO use.

Furthermore, the applicant has not adequately demonstrated why alternative options, such as refurbishment and upgrading of the existing flats, would not provide a viable and sustainable future for the property. Modernised self-contained flats would attract a broader range of occupants, including professionals, couples, small families and downsizers, potentially increasing rental income without the significant intensification of use associated with a large HMO.

Consequently, the pre-application history suggests that the principal objective has been to identify the most profitable use of the site following the failure of an earlier redevelopment proposal, rather than to deliver a form of development that best reflects the character of the area, the site's environmental constraints, and the long-term housing needs of the local community. This should be given significant weight when assessing whether the proposal represents sustainable development in accordance with Havant Borough Council's planning policies.

Residential Amenity Protection (Government Guidance NPPF)

Occupancy Assumptions and Nutrient Neutrality Assessment

The NPPF discourages development that leads to overcrowding, parking stress, noise disturbance, and loss of community cohesion.

The application assumes a maximum occupancy of one person per HMO bedroom when calculating the development's impact and supporting its nutrient neutrality conclusions. This assumption is not supported by the Government's mandatory HMO licensing standards.

The statutory guidance for Houses in Multiple Occupation states that the minimum sleeping room size for:

- One person over the age of 10 is **6.51m²**.
- Two persons over the age of 10 is **10.22m²**.

Source: [Houses in multiple occupation and residential property licensing reform: guidance for local housing authorities](#)

The submitted floor plans show that all proposed HMO bedrooms significantly exceed the 10.22m² threshold that permits occupation by two adults under the national HMO standards:

First Floor

- Bedroom: 14.01m²
- Bedroom: 15.09m²
- Bedroom: 14.17m²

Ground Floor

- Bedroom: 14.27m²
- Bedroom: 14.32m²
- Bedroom: 14.06m²
- Bedroom: 14.36m²

Each of these rooms is between approximately 37% and 48% larger than the minimum standard required for two-person occupation. Consequently, there is nothing within the submitted scheme that physically prevents occupation by two adults per room, nor is there any guarantee that future HMO licensing arrangements would restrict occupation to a single person.

As a result, the planning assessment appears to understate the realistic occupancy potential of the development. Whilst the application is assessed on the basis of one person per room, the room sizes allow lawful occupation by two adults. This creates a credible scenario whereby actual occupancy could substantially exceed the figures relied upon in the nutrient neutrality calculations.

If the development were occupied at levels consistent with the permitted room standards, the resulting increase in wastewater generation and associated nutrient loading could be materially higher than that assessed within the application. The claimed nutrient neutrality position is therefore not robust unless it is supported by a legally enforceable planning condition or obligation limiting every bedroom to single occupancy in perpetuity.

In the absence of such controls, the Local Planning Authority cannot be satisfied that the occupancy assumptions used in the nutrient neutrality assessment represent the maximum likely population of the development. The precautionary approach required for nutrient neutrality assessments should therefore assume occupation based on the full lawful capacity

of the proposed bedrooms rather than an unenforceable assumption of single-person occupancy.

Accordingly, the nutrient neutrality assessment should be revisited and recalculated using a realistic worst-case occupancy scenario, or the application should provide binding occupancy restrictions that can be monitored and enforced for the lifetime of the development.

Highway Safety, Pedestrian Risk and Vehicle Movements

Under the National Planning Policy Framework (NPPF) a development is required to 'Provide safe and suitable access for all users.'

The proposed development raises significant highway and pedestrian safety concerns due to the location of the site access in close proximity to a busy dual carriageway (Hulbert Road). The existing access arrangements may be suitable for a single-family dwelling, but they are not necessarily appropriate for a high-intensity HMO development with multiple unrelated occupants and significantly increased vehicle movements throughout the day.

The application is based on a maximum provision of nine parking spaces and an assumed occupancy level which may underestimate the true number of residents. As previously noted, the bedrooms are all capable of accommodating two adults under national HMO standards. If actual occupancy exceeds the figures used within the application, there is a corresponding likelihood of increased vehicle ownership and vehicle movements, resulting in greater traffic generation than that assessed.

Of particular concern is the operation of the site's electronic entrance gate. Vehicles entering the site may be required to slow down or stop whilst waiting for the gate to open. Equally, vehicles leaving the site may queue internally before exiting onto the highway. This creates the potential for vehicles to block or partially obstruct the pedestrian footway that crosses the site entrance.

The footway is used by pedestrians, including school children walking to and from nearby schools. During peak morning and afternoon periods, when commuter traffic is highest and school travel activity coincides with increased vehicle movements, the risk of conflict between vehicles and pedestrians is significantly heightened.

The proximity of the access to the dual carriageway further exacerbates these concerns. Drivers entering and exiting the site must make manoeuvres in an environment where traffic speeds and traffic volumes are considerably higher than on a typical residential street. Any delay caused by gate operation, waiting vehicles, or difficulties entering the traffic stream can increase collision risk and reduce overall highway safety.

The applicant appears to have assessed the proposal based on a limited number of vehicle movements and residents. However, if the development operates at a higher occupancy level, vehicle ownership and associated movements are likely to increase proportionately. This would lead to a greater frequency of vehicles crossing the pedestrian route, increasing the exposure of pedestrians, particularly children, to potential hazards.

Given the site's location, the presence of a well-used pedestrian route, the proximity to a busy dual carriageway and the potential for actual occupancy levels to exceed those assumed within the application, there is insufficient evidence that the proposal would not have an adverse

impact on highway and pedestrian safety. A robust transport assessment should therefore demonstrate the safety of the proposed access arrangements under realistic worst-case occupancy and vehicle ownership scenarios, rather than relying solely on the applicant's assumed levels of occupation and parking demand.

Accordingly, the Local Planning Authority should seek further evidence that the development will not result in unacceptable risks to pedestrians, school children, cyclists and highway users, and should be satisfied that the access arrangements remain safe under the maximum reasonably foreseeable level of occupancy.

Increased Resident Turnover, Visitor Activity and Service Demand

The proposal is likely to generate significantly greater levels of activity than the existing family dwellings due to the nature of HMO accommodation. Unlike traditional family housing, HMOs typically experience a higher turnover of occupants, more frequent changes in tenancy, and increased numbers of visitors, deliveries and servicing requirements.

Whilst the applicant may assess the development based on a fixed number of residents, the operational reality of nine separate HMO units is likely to result in a substantially higher frequency of arrivals and departures throughout the week. New occupants moving in and out, visitors attending the property, food deliveries, parcel deliveries, tradespersons, cleaning services and waste collection activities all contribute to a level of activity that is materially greater than would be expected from four family homes.

This increased activity has the potential to affect the character and amenity of the surrounding residential area. The existing neighbourhood is predominantly characterised by stable, low-density family housing with predictable patterns of vehicle movements and occupancy. The proposed development would introduce a more intensive form of residential use, resulting in a greater number of daily vehicle movements, more frequent use of the site access, increased demand on parking, and higher levels of pedestrian and vehicle interaction.

The concern is compounded by the fact that the occupancy assumptions within the application may underestimate the likely number of residents. As all bedrooms exceed the national minimum room size for occupation by two adults, actual occupancy could exceed the figures used in the planning assessment. This would inevitably increase the number of visitors, deliveries, service vehicles and associated vehicle movements beyond those currently envisaged.

The cumulative impact of these activities should not be assessed solely in terms of vehicle numbers but also in terms of the effect on residential amenity, community cohesion and the character of the locality. The development would represent a significant intensification of use compared with the existing family homes and there is insufficient evidence that the resulting levels of activity can be accommodated without harm to neighbouring residents and the established residential character of the area.

Consequently, the Local Planning Authority should apply a precautionary approach and assess the proposal on the basis of realistic occupancy and usage levels, rather than assuming that activity patterns will be comparable to those generated by conventional family housing. This is particularly important given the proposal's scale, the absence of existing HMOs in the immediate area, and the site's location within an established family-oriented neighbourhood.

Parking Provision and Overspill Parking Concerns

The proposed provision of one parking space per HMO room is based on an assumption that vehicle ownership will be limited to the number of available spaces. However, there is no mechanism to guarantee this outcome, particularly where the bedrooms are of a size capable of accommodating two adult occupants. Should actual occupancy exceed the assumed levels, vehicle ownership and parking demand are likely to increase accordingly.

The site is constrained by existing double yellow line restrictions on the adjoining highway, limiting opportunities for lawful overspill parking. Any shortfall in on-site capacity may therefore result in additional parking pressure on neighbouring roads, causing inconvenience and displacement of parking onto surrounding residential streets used by existing residents.

Furthermore, there is no assurance that occupiers' vehicles will be limited to standard-sized cars. HMOs often attract a diverse range of residents, including tradespeople and contractors who may own vans or commercial vehicles requiring larger parking spaces and manoeuvring areas. The parking assessment appears to assume typical car usage and does not adequately consider the impact of larger vehicles on the site's capacity and operation.

Given the potential for higher occupancy levels, additional vehicle ownership, and the use of vans or commercial vehicles, the proposed parking provision may be insufficient and risks creating parking and highway impacts that have not been fully assessed within the application.

Overspill Parking and Highway Safety Concerns

Should parking demand exceed the nine on-site spaces proposed, there is a significant risk of overspill parking on the surrounding highway network. This is of particular concern given the site's proximity to a blind bend (Ferndale) and a heavily trafficked section of road (Hulbert Road).

Vehicles parked on-street near the site could obstruct visibility for both drivers and pedestrians, reducing sightlines around the bend and increasing the risk of collisions. Drivers approaching the bend may have insufficient time to react to parked vehicles, vehicles manoeuvring into parking spaces, or pedestrians emerging from behind parked vehicles. Any reduction in visibility is especially concerning on a route already subject to high traffic volumes during peak periods.

The risk is further heightened by the potential for larger vehicles, such as vans and trade vehicles, which occupy greater road space and can create more substantial visibility obstructions than standard passenger cars. Given the nature of HMO accommodation, there is no guarantee that occupiers will only own standard-sized vehicles.

Consequently, any overspill parking arising from under-provision of on-site parking would not simply be an inconvenience to neighbouring residents but could create a material highway safety risk. The Local Planning Authority should therefore assess the development on the basis of realistic maximum occupancy and vehicle ownership levels, including the potential impact of overspill parking on visibility, traffic flow and road safety in the vicinity of the blind bend.

Impacts by Visitors on Parking Safely

The parking assessment appears to consider only resident vehicle ownership and does not adequately account for visitor parking demand. Given the scale of the proposed HMO development, it is reasonable to expect regular visits from friends, family members, support

workers, delivery drivers, contractors and service providers. These additional vehicles will place further pressure on the limited parking provision available on-site.

In the absence of dedicated visitor parking spaces, there is a significant risk that visitor vehicles will seek to park on neighbouring residential roads, exacerbating existing parking pressures and increasing the likelihood of overspill parking and associated highway safety concerns.

This raises clear **highway safety concerns** and conflicts with policies requiring safe and efficient transport arrangements.

Architecture Design Statement – parking survey

The applicant states that the proposed access improvements respond to concerns raised by local residents regarding on-street parking associated with 1 Ferndale and caravans.

The applicant suggests that the removal of the caravans will help address existing parking concerns. However, whilst the removal of the caravans may reduce some current parking demand, it does not eliminate the underlying issues and fails to account for the substantial additional parking pressures likely to be generated by the proposed nine HMO units.

In reality, the proposal replaces one source of parking demand with another, potentially far greater source. The development introduces multiple independent households, each with the potential to own a vehicle, receive visitors and require deliveries and servicing. Given that the bedrooms are capable of accommodating higher occupancy levels than those assumed in the application, actual parking demand could exceed the provision available on-site.

As a result, the removal of the caravans should not be presented as a net parking benefit. Rather, the proposal risks replacing an existing parking issue with a more intensive and permanent form of parking demand, increasing pressure on surrounding roads and further impacting neighbouring residents and highway safety. The Local Planning Authority should therefore assess the proposal based on the combined effect of the proposed HMO use rather than relying on the assumption that removing the caravans will resolve existing parking concerns.

Noise, Activity and Loss of Residential Amenity

The proposed 9-bedroom HMO would result in a significant intensification of residential use compared with the existing family dwellings and is likely to generate substantially higher levels of noise, activity and general disturbance. Unlike a traditional family home, a large HMO accommodates multiple unrelated occupants with differing work patterns, lifestyles and schedules, leading to activity throughout the day and evening rather than the more predictable patterns associated with family occupation.

The increased number of residents, together with visitors, deliveries, taxis, service vehicles and more frequent tenant turnover, is likely to result in a continuous level of comings and goings that would materially alter the character of the area. Vehicle movements, car doors, conversations, outdoor activity, refuse collection and residents arriving and leaving at different times all contribute to a greater level of disturbance than would reasonably be expected from the existing use.

Given the scale of the proposal, there is also a credible risk that actual occupancy levels may exceed those assumed within the application, further increasing activity and associated noise. The cumulative effect would be a reduction in neighbouring residents' ability to enjoy the quiet residential environment that currently characterises the area.

The development is also likely to produce substantially greater volumes of refuse and recycling. With a large number of occupants, there is an increased risk of overflowing bins, waste storage issues, litter and associated odours, particularly where collection capacity does not adequately reflect actual occupancy levels.

Increased vehicle movements arising from residents, visitors, deliveries, taxis, tradespeople and service providers. This would lead to increased traffic, vehicle noise, engine idling and exhaust emissions, all of which can have a detrimental impact on neighbouring residential amenity.

Accordingly, the proposal would have the potential to adversely affect the living conditions of neighbouring occupiers through increased noise, disturbance and loss of quiet enjoyment, contrary to the objectives of Havant Borough Council's policies requiring development to protect residential amenity and respect the established character of residential neighbourhoods.

Conclusion and Grounds for Objection

For the reasons set out above, I respectfully request that Havant Borough Council **refuse** this application as it represents an unsustainable and inappropriate over-intensification of the site that would result in significant harm to the character, amenity and function of the local area.

The development would remove four existing homes capable of accommodating families and replace them with a 9-bedroom Sui Generis HMO in an established family-oriented neighbourhood served by good schools. This would reduce the stock of family housing in a sustainable location where such accommodation is both valuable and in demand. The proposal fails to maintain a balanced housing mix and is contrary to the objectives of creating sustainable communities as promoted through the National Planning Policy Framework and Havant Borough Council's housing and design policies.

The application relies on occupancy assumptions that appear to underestimate the potential intensity of the development. All proposed bedrooms exceed the national minimum standards for occupation by two adults, meaning actual occupancy levels may be significantly higher than those used to justify parking provision, traffic generation and nutrient neutrality calculations. In the absence of enforceable occupancy restrictions, the Local Planning Authority should assess the development based on its realistic maximum capacity.

The proposal would generate increased parking demand, visitor parking, vehicle movements, deliveries, waste collection and general activity. These impacts are likely to place additional pressure on an already constrained highway environment, particularly given the proximity to a busy dual carriageway, a blind bend, existing parking pressures and pedestrian routes used by local school children. The removal of the caravans does not eliminate these concerns, but

instead replaces one source of parking demand with a larger and more permanent source associated with a high-occupancy HMO.

The proposal would also result in increased noise, disturbance, refuse generation and loss of residential amenity arising from the occupation of the property by multiple unrelated adults with differing lifestyles and working patterns. This level of activity would be out of keeping with the surrounding low-density residential character and would adversely affect neighbouring residents' enjoyment of their homes.

Furthermore, the planning history suggests a continuing attempt to maximise the intensity and financial return of the site. The previous proposal for three family dwellings was considered unsuitable due to the site's constraints, yet the current application seeks a different form of intensification by substantially increasing the number of occupiers within the existing building. The applicant has failed to demonstrate that refurbishment and upgrading of the existing flats would not provide a viable alternative. Improved self-contained flats would appeal to a broader market, increase rental values and secure the long-term future of the property without introducing the significant adverse impacts associated with a large HMO.

Taken as a whole, the proposal appears driven primarily by income maximisation rather than by a genuine need to deliver sustainable housing that complements the character of the area. The cumulative impacts on housing mix, parking, highway safety, residential amenity, community balance and local character outweigh any claimed benefits of the scheme.

Accordingly, the application conflicts with the objectives of the National Planning Policy Framework, **Policy CS9 (Housing)**, **Policy CS16 (High Quality Design)** and **Policy DM1** of Havant Borough Council's planning framework and should therefore be refused.