Good afternoon,

FORMAL OBJECTION TO PLANNING APPLICATION APP/26/00065 – 1 FERNDALE, WATERLOOVILLE

I am writing as a nearby resident living in close proximity to 1 Ferndale to formally object to planning application APP/26/00065, We have not been notified of this by yourselves

Which seeks permission to convert the existing four two-bedroom flats into a single large nine-room House in Multiple Occupation (HMO).

I have considered the nature of the proposal and the potential consequences for the surrounding residential properties. My objection is based on the intensification of the use, residential amenity, noise and disturbance, parking and highway impacts, privacy, waste management, and the effect on the established residential character of the area.

I respectfully request that the Council gives these matters full consideration before reaching a decision.

1. Significant intensification of the existing use the proposal represents a substantial change in the way the property will be occupied.

The existing building comprises four two-bedroom flats, whereas the proposal would create a single HMO containing nine rooms. This is therefore not simply a minor internal alteration; it represents a significant intensification and consolidation of residential occupation within the property.

I am concerned that this increased intensity will result in substantially more people using the property, its entrances, communal areas, external areas, and the surrounding highway.

The Council should assess whether this level of intensification is appropriate for this particular residential location and whether the resulting activity would adversely affect neighbouring properties.

2. Impact on residential amenity

As a resident living close to the property, I am particularly concerned about the effect that a nine-room HMO will have on the reasonable enjoyment of neighbouring homes.

The potential increase in the number of occupants and associated activity will result in:

- increased comings and goings
- increased pedestrian activity

● additional visitors

● increased use of communal and external areas

● increased deliveries and refuse collection

● greater evening and weekend activity

● increased potential for noise and disturbance

These are legitimate planning considerations because the Council must consider the effect of development on the living conditions and amenity of existing residents.

The current National Planning Policy Framework requires development proposals to take account of likely effects, including cumulative effects, on health and living conditions and specifically requires unacceptable impacts on neighbouring residents to be avoided or appropriately mitigated.

3. Noise and disturbance

I have serious concerns regarding the potential for increased noise and disturbance arising from the proposed use.

Nine separately occupied rooms have the potential to generate a considerably different pattern of occupation from the existing arrangement of four flats.

I therefore ask the Council to consider carefully:

● the number of occupants proposed

● the location of bedrooms and communal areas

● the location of entrances and exits

● the use of external areas

● the relationship between communal areas and neighbouring properties

● potential evening and night-time activity

● the cumulative effect of noise generated by occupants and visitors

The current NPPF specifically requires development to avoid unacceptable adverse effects from noise and to mitigate potential adverse impacts resulting from noise.

4. Parking and highway safety

Parking is a significant concern with this proposal as it is on a sharp, blind bend as you come off from the Hulbert Road and is and then a sharp left into the property. As photo below.

The conversion to a nine-room HMO will increase demand for parking substantially compared with the existing arrangement. Even if not every occupant owns a vehicle, the Council should not assume that the additional residents will be entirely car-free without appropriate evidence.

I ask the Council to establish:

1. how many parking spaces are actually available at the property; 2. how many spaces are required under the Council's applicable parking standards; 3. how many vehicles the proposed occupants are expected to generate; 4. where overspill parking would occur; 5. whether nearby roads have sufficient capacity; 6. whether additional parking would obstruct existing residents' access or visibility; and 7. whether the proposal would create or worsen highway safety issues.

Havant's adopted DM11 requires safe and secure vehicular and cycle parking and measures to address informal parking where it could affect highway capacity, operation, safety or local amenity. DM13 requires residential development to provide parking and cycle storage in accordance with the Council's standards.

The current national framework likewise requires the transport implications of development to be properly assessed, including its effects on the transport network and highway safety.

5. Character of the surrounding residential area. The surrounding area is an established residential neighbourhood.

I am concerned that changing four conventional flats into a nine-room HMO would alter the character and intensity of occupation of the property and will create an inappropriate level of activity compared with neighbouring residential properties.

Havant's Policy CS16 – High Quality Design requires development to respond to and respect its local context and to create places where people want to live, work and relax.

The national planning framework similarly requires development to respond appropriately to its context and to create well-designed, sustainable and healthy places.

I ask the Council to consider not just the physical appearance of the building but also how the proposed use would function within the existing neighbourhood.

6. Privacy and overlooking

I request that the Council carefully assesses the proposed internal layout and the relationship between the property and surrounding homes.

Particular consideration should be given to:

● bedroom windows

● communal rooms

● external amenity areas

● entrances and circulation areas

● potential overlooking

● loss of privacy

● increased activity immediately adjacent to neighbouring properties

The fact that the proposal may not involve significant external construction does not remove the need to assess the effects arising from the change in use and increased intensity of occupation.

7. Waste, refuse and external areas

A nine-room HMO will inevitably generate refuse and recycling requirements.

I ask the Council to ensure that the application provides adequate and appropriately located facilities for:

● general waste

● recycling

● food waste where applicable

● storage of bins

● collection arrangements

● prevention of bins and refuse adversely affecting neighbouring properties or the public highway.

The Council should also consider whether the proposed external areas are capable of accommodating these facilities without creating additional nuisance or visual impact.

8. Suitability of a large HMO at this location I recognise that HMOs provide an important form of accommodation and that the Council operates a separate HMO licensing regime.

However, planning permission and HMO licensing are separate matters.

Havant Borough Council confirms that HMOs accommodating five or more people from two or more households require licensing and that the licensing process considers building and management information and health and safety risks.

I therefore ask the Planning Authority to ensure that the planning assessment independently considers whether the scale and intensity of this particular proposed HMO is appropriate for its location.

9. Evidence supporting the proposed occupancy I note that the application file includes an Occupancy Calculation Statement and information relating to current occupant numbers.

I respectfully request that the Council carefully scrutinises the evidence supporting the proposed nine-room arrangement and establishes:

● the maximum number of occupants

● whether each room is intended for one person or potentially more than one

● the amount of communal living space available

● the amount and quality of external amenity space

● the number of bathrooms/WCs available

● the arrangements for refuse storage

● the proposed management arrangements

● whether the accommodation would provide an acceptable standard for all future occupants.

If the proposed maximum occupancy is greater than nine people, I would ask the Council to assess the application on the basis of the maximum realistic occupancy, rather than assuming single occupancy of every room.

10. Cumulative impact

I also ask the Council to consider the proposal in the context of the wider area.

The impact of an individual HMO should not necessarily be considered in isolation where there are other HMOs, flats, conversions or intensified residential uses nearby.

The current national framework expressly requires consideration of cumulative effects in relation to living conditions and pollution.

I therefore request that the Council establishes whether there are other HMOs or similarly intensified residential uses within the immediate vicinity of 1 Ferndale and considers whether the proposal would contribute to an unacceptable concentration or cumulative impact.

11. Need for appropriate management arrangements Given the scale of the proposed HMO, I ask that the Council establishes how the property would be managed on a day-to-day basis.

If planning permission were to be considered, I would ask the Council to seek clear information regarding:

● the identity and availability of the property manager

● how complaints from neighbouring residents would be dealt with

● arrangements for waste

● management of external areas

● tenant turnover

● maintenance

● noise complaints

● parking arrangements

● emergency contact arrangements

Any management arrangements relied upon in determining the application should be capable of being effectively secured and enforced where necessary.

Conclusion:

For the reasons set out above, I respectfully request that planning permission for application APP/26/00065 is refused.

My objection is not based simply on opposition to HMOs as a form of accommodation. It is based on the specific scale and intensity of the proposed nine-room HMO at 1 Ferndale and its potential impact on the established residential environment and nearby residents.

I respectfully ask the Planning Authority to give particular consideration to:

1. the significant intensification from four two-bedroom flats to a nine-room HMO; 2. the effect on neighbouring residential amenity; 3. noise and disturbance; 4. parking capacity and potential overspill parking; 5. highway safety; 6. privacy and overlooking; 7. external amenity space; 8. refuse and recycling arrangements; 9. the maximum realistic occupancy; 10. the adequacy of communal facilities; 11. the management arrangements; and 12. any cumulative impact arising from other intensified residential uses or HMOs in the surrounding area.

If the Council is minded to approve the application, I respectfully request that all material planning concerns are fully addressed and that any necessary restrictions or mitigation measures are secured through appropriately worded planning conditions.

I also request that this letter is formally recorded as a representation against planning application APP/26/00065 and taken into account when the application is determined.

Thank you for considering my objection.

Yours faithfully.