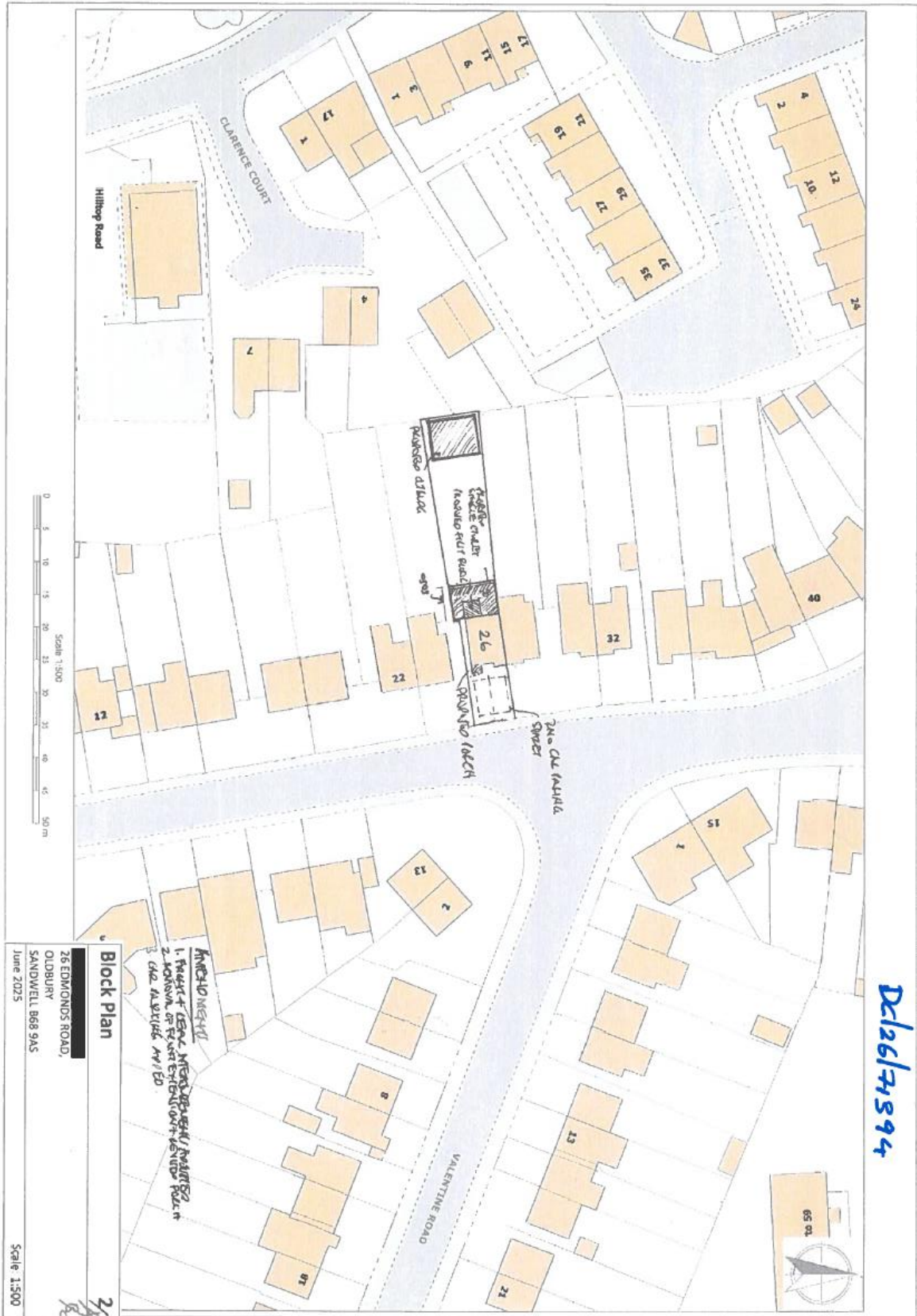


DC/26/71394 – Park Plan



DC/26/71394

DC/26/71425 – Further objection

Dear Planning Officer,

I am writing further to my **email of 14 May 2026**, submitted as an additional objection, to provide a **supplementary representation** in response to the Planning Officer's report (FS-Case-840932109).

Status of this representation

For clarity, this email **does not repeat earlier objections**. It is confined to:

- responding directly to conclusions and assertions made in the officer's report;
- clarifying matters that remain unresolved following that response; and
- identifying evidential gaps that, in my submission, prevent a fully informed and robust determination.

Where similar themes have been raised previously, they are addressed here **only insofar as the officer's report asserts that they have been resolved**, and this representation explains why that conclusion is not supported by evidence.

While I acknowledge the points raised to date, several **material planning concerns remain outstanding**, particularly in relation to boundary treatment, the accuracy and reliability of the submitted plans, the dormer, the enabling role of the extension in a foreseeable 6-bed HMO, and the resulting cumulative impacts. In my view, these matters have **not yet been fully assessed or evidenced**, and this representation is intended to assist officers and Members by setting out why further scrutiny is required before determination.

Summary for Members – how this differs from earlier representations

This supplementary submission differs from earlier correspondence by:

- responding specifically to statements made in the officer's report rather than restating original objections;
- identifying procedural and evidential deficiencies arising from that report;
- setting out why certain conclusions (particularly in respect of boundary treatment and permitted development) cannot lawfully be relied upon without further information; and
- explaining the planning relevance of foreseeable intensification impacts in the context of the extension now before Members.

Main planning grounds for objection

A. Incorrect Ownership Certificate – Certificate A Signed in Error

The applicant signed **Certificate A**, declaring that they were the *sole owner* of the land to which the application relates. This was **factually incorrect**. The Land Registry title confirms that the property is owned by a **limited company**, not the individual who submitted the application.

Under **Article 14 of the Town and Country Planning (Development Management Procedure) (England) Order 2015**, where the applicant is **not the sole owner**, they must complete **Certificate B** and serve formal notice on the actual owner.

Because the property is owned by a company:

- **Certificate A could not lawfully be used,**
- **Certificate B was required,** and
- the application was therefore **invalid at the point of submission.**

Although the officer states that ownership is “not a material planning reason for refusal”, the **correct completion of ownership certificates is a statutory requirement**, not an optional administrative detail.

Key issues remain:

- The application proceeded for a period on an **incorrect legal basis.**
- The application was **not revalidated**, despite the defect.
- The Committee is entitled to consider whether the process has been sufficiently robust, transparent, and procedurally sound.

This procedural irregularity is directly relevant to the **fairness and legality** of the planning process and to the confidence Members can place in the submitted documentation.

B. Boundary Treatment – Misclassification and Material Impact

The application form incorrectly stated that boundary treatment was “Not applicable”. This is factually incorrect.

1. The extension is a boundary treatment

The proposed extension:

- is built **directly on the shared boundary,**
- replaces the existing boundary condition,
- forms a **new solid boundary wall,**
- affects privacy, enclosure, drainage, and maintenance access.

Boundary treatment is a **material planning consideration**, not a Party Wall matter.

2. The officer's report does not assess boundary impacts

There is no assessment of:

- the height and massing of the boundary-side wall,
- the impact on the existing hedge/fence,
- whether the extension will overhang or encroach,
- the effect on garden usability and enclosure,
- the visual and amenity impact of a continuous solid wall.

These omissions are significant given the constrained nature of the boundary.

C. Accuracy and Reliability of Submitted Plans

Concerns regarding plan accuracy have been raised previously; however, the officer's report asserts that the submitted drawings are compliant. It is therefore necessary to clarify why that conclusion cannot be supported.

Although the officer states the plans are compliant, they **do not accurately represent the physical relationship** between the properties.

Missing or unclear information includes:

- no dimensioned elevation of the boundary-side wall,
- no depiction of the existing outbuilding on my side,
- no section drawings showing levels or height relationships,
- no demonstration of how the extension interacts with the existing hedge/fence.

Without accurate plans, the Committee cannot properly assess:

- boundary treatment,
- amenity impact,
- overbearing effect,
- construction feasibility.

The Committee is entitled to require **accurate, dimensioned, reliable plans** before determining the application.

D. Dormer Roof Extension – Lack of Evidence for Permitted Development

The dormer has now been formally disclosed, and I have appointed a surveyor who will be taking **precise measurements** to establish whether it meets the requirements of the General Permitted Development Order (GPDO).

1. The Council has not published any dormer plans

The officer states the dormer is permitted development, but:

- no dormer drawings appear on the planning portal,
- no measurements, volume calculations, or compliance evidence have been provided,
- no GPDO assessment is included in the officer's report.

The only information the Council has is a **Building Control Initial Notice**, which:

- is not a planning submission,
- is not assessed for GPDO compliance,
- does not contain the required PD measurements,
- is not publicly available or subject to scrutiny.

2. A lawful PD assessment requires evidence

To establish PD status, the Council must have:

- scaled dormer drawings,
- cubic volume calculations,
- confirmation of the 20cm eaves set-back,
- confirmation that the ridge is not raised,
- confirmation that materials match the existing roof.

None of this evidence has been provided.

3. My surveyor will be verifying the dormer dimensions

Given the lack of transparency, I have appointed a surveyor who will:

- measure the dormer,
- calculate the cubic volume,
- confirm the eaves set-back,
- confirm ridge height,
- confirm materials.

Until these measurements are available, the Council **cannot lawfully assert** that the dormer is permitted development.

4. Why this matters to the Committee

The extension forms part of the **overall intensification** of the property, including the dormer and HMO conversion. If the dormer is **not** permitted development, then:

- the officer's report is factually wrong,
- the intensification is not lawful,
- the extension becomes part of an **unauthorised HMO scheme**,
- the Committee cannot rely on the officer's recommendation.

E. Extension as an Enabling Component of a 6-Bed HMO and Resulting Cumulative Impact

Concerns about HMO intensification have been raised previously; however, this section addresses the officer's position that such impacts are not material to the extension.

Although the HMO itself is not before the Committee, the **purpose, foreseeable use, and cumulative impact** of the extension are material planning considerations.

1. The extension is functionally linked to a foreseeable 6-bed HMO use

Case law is clear that where a development:

- enables,
- facilitates, or
- is functionally linked

to a foreseeable use, that use **must** be taken into account.

The extension is clearly part of a **phased 6-bed HMO scheme**, evidenced by:

- the Building Control Initial Notice,
- the disclosed dormer,
- the internal layout,
- the scale and positioning of the extension.

2. The extension is not a standalone domestic addition

Its size, depth and boundary-side massing are:

- consistent with HMO intensification,
- designed to create additional floorspace for multiple unrelated occupants.

3. The cumulative impact of intensified occupation is a material planning consideration

Even if the HMO itself is permitted development, the **effects** of intensified occupation are not.

The extension will:

- increase noise and comings-and-goings,
- intensify boundary pressure,
- increase waste storage demands,
- contribute to overdevelopment of a constrained plot,
- reduce privacy,
- increase overbearing massing and enclosure.

These are all **material planning considerations** that fall squarely within the Committee's remit.

4. The correct legal position

The Committee cannot refuse the HMO, but it can refuse or defer the extension if the extension contributes to unacceptable harm arising from the foreseeable HMO use.

F. Unresolved Structural and Boundary Concerns

While the officer states structural matters fall under the Party Wall Act, planning must still consider:

- whether the extension's siting creates **unacceptable risk of damage** to neighbouring structures,
- whether the design is **practicable** given the tight boundary constraints,
- whether the extension can be built **without encroachment**,
- whether the boundary treatment is appropriate in planning terms.

These issues relate directly to **amenity, boundary treatment, and feasibility**, and therefore fall within the Committee's remit.

Matters requiring further consideration prior to determination

In light of the above (and read alongside my email of 14 May 2026), I respectfully ask that the following are reviewed before the application is determined:

- whether the submitted plans are sufficiently accurate and detailed to allow a proper assessment of boundary treatment, neighbour impact, and buildability;
- whether the ownership certificate position and any related procedural matters have been properly regularised;
- whether there is adequate evidence to support the conclusion that the dormer is permitted development;
- whether the extension's relationship to the intended 6-bed HMO use and its cumulative planning impacts have been properly assessed;
- whether the amenity and boundary impacts on neighbouring occupiers have been fully reconsidered using accurate information.

I would be grateful if these matters could be addressed before any recommendation is finalised. Where further information or amended plans are required to enable a lawful and robust assessment, I ask that these are requested prior to determination.

Thank you for your time and consideration.