



29 June 2021

Dear Ms Wells,

186 SEA FRONT, HAYLING ISLAND

I have been retained by my clients, [REDACTED] to critically review the revisions that have been made to the proposed redevelopment of the abovementioned property.

Given the length of time it has taken for the applicant's architect to submit a revised proposal, I had expected the architect to take seriously the views that had been made by interested parties. Much to my client's disappointment the revised scheme demonstrates that the architect has endeavoured to tinker around the edges without looking at the more fundamental issues. As a result, this revised proposal retains the three-storey built form, albeit within a slightly smaller building envelope, and with one less unit of accommodation. Whilst it is noted that the height of the revised building has been reduced so that it does not exceed the ridge height of the existing house, that belies the artificial way that such a reduction has been achieved, and glosses over the fact that the revised building would still amount to a gross overdevelopment of the site and amount to an inappropriate response to the qualities and character of the site.

For the purposes of clarity the following list identifies the majority of the changes that have been made. This list demonstrates the extent to which the applicant has resisted the ambition of local residents to secure an appropriate redevelopment scheme for this site;-

GRD FLOOR PLAN

- a) Lift turned 90 degrees
- b) Cycle store/refuse store replaced by enlargement to apartment G3
- c) Minor tweaks to internal layout of apartments G1 and G2
- d) Communal corridor/staircase narrowed

FIRST FLOOR PLAN

- a) Internal layout re-configured
- b) Habitable room windows in north elevation deleted
- c) One non-habitable room window introduced
- d) East-facing screened balcony introduced
- e) Corner glazing to south elevation deleted

SECOND FLOOR PLAN

a) Footprint reduced and internal layout re-configured to provide two apartments instead of three

b) 1.8m high obscure glazed screen installed across part of northern edge of enlarged balcony

PARKING [assumed allocated parking given likely market attraction and desirability of including electric charging points]

a) Was 16; now 15 spaces. The SPD requires a minimum 17 spaces plus 20% (4) for visitors (total 21)

CYCLE STORAGE

a) Was integral; now external comprising five individual stores each accommodating two cycles. However, the SPD requires a minimum capacity of 17 cycles excluding visitor facilities capable of accommodating 4 cycles

SITE LAYOUT & BUILDING MASS

a) The front of the building has been moved back by approx. 2.7m and its apparent mass has been moderated

b) The overall height has been reduced by lowering floor-to-ceiling height to 2.25m at second floor level [industry standard is 2.4m]

c) The roof structure appears impossibly thin just to ensure the overall height does not exceed the ridge height of the existing house

d) A 6-bin refuse store enclosure is located in the north-east corner

e) No material improvements to soft landscaping which still appears as an afterthought

There is a discrepancy in the architect's drawings. I would draw your attention to the Second Floor Plan where the obscure glazed balustrade treatment to the balcony edge is annotated as being 1.8m in height across the width of the building. This, however, contradicts the same detail shown on the north elevation of the building which shows that for most of its length the obscure glazed balustrade panels are 1.4m in height from finished floor level, and only a comparatively short section, coinciding with the bi-fold doors which opens onto the balcony, extends upwards to 1.8m.

Having reviewed the proposed revisions it is considered that the proposed amended scheme has failed to address the many shortcomings identified in the original, and in some respects represents a worse design solution. On behalf of my clients I must therefore maintain an objection to the scheme as revised. In summary this objection is based on the following matters.

Design/Townscape

This part of Sea Front is largely characterised by two-storey detached buildings with either flat or pitched roofs, some with accommodation in the roof structure served by dormer windows or rooflights. Three-storey buildings do not become the norm until west of Reading House, some distance away from the application site. Those buildings fronting Sea Front within a reasonable distance of the application site are characteristically set within spacious grounds and are set back from the road frontage. Despite comprising a significantly higher density the redevelopment of 188-190 did manage to respect its surroundings in terms of built form. Even

the overtly modern element on the adjoining site was limited to a scale that complemented its neighbour [now the application site].

Even though the top floor of the proposed building is set back from the main facades, it would nevertheless be read as a three-storey building which amounts to an uncharacteristic feature in the street scene. In addition, the proposed building would take up a significant proportion of the site frontage to Sea Front. Furthermore, the three-storey scale, which would uncharacteristically dominate the Alexandra Avenue frontage, and building footprint would also give rise to unacceptable visual intrusion and a loss of spaciousness around the building.

In short, the proposal would amount to an unsympathetic form of development and erode the pleasant character of the immediate locality in which it is read. That shortcoming is compounded by the extent of hardsurfacing to provide car parking, and with a lack of meaningful soft landscaping (robbing the site of its potential to enhance bio-diversity), it would increase surface water run-off to the drainage system.

In townscape/street scene terms the proposed redevelopment would fail to add to the overall quality of the area by virtue of its scale, lack of space around the building, and the prominence of within curtilage car parking. It would not therefore be sympathetic to local character, including the surrounding built environment and landscape setting. With no benefits to outweigh that harm, the proposal would conflict with the design objectives of both the NPPF and the Council's Core Strategy at policy CS16.

Impact on living conditions

It is an accepted tenet of the planning system that the local planning authority controls development in the public interest. But it is also accepted that, in the public interest, development should not have a harmful impact on the living conditions of residents who would abut or live nearby to new development. This is reflected in Policy CS16 of the Council's Core Strategy and the associated Supplementary Planning Document. However, whilst the latter sets out design principles it is only prescriptive in relation to back-to-back separation where a minimum distance of 20m is stipulated, it does not directly address impacts arising from the redevelopment of corner sites.

The rear (north) elevation of the proposed development incorporates a balcony terrace, the majority of which overlooks the first floor dormer bedroom windows to 26 Alexandra Avenue. The proposed revisions now include a balcony with a direct view into the rear garden of No.182 Sea Front. These arrangements would give rise to a significant loss of privacy, loss of outlook and overlooking which Policy CS16 specifically seeks to avoid.

In these circumstances the proposed redevelopment would therefore conflict with policy CS16 of the Core Strategy in that it would significantly harm the amenity of the occupiers of 26 Alexandra Avenue and 182 Sea Front by virtue of increased overlooking and a loss of privacy.

Other matters

The level of on-site car parking provision falls short of the standard set out in the Council's SPD "Parking" and does not include dedicated visitor parking. The shortfall of some 5 spaces is indicative that the scheme would amount to an unacceptable over-development of the site. The SPD states "It will not necessarily be appropriate to lower parking standards simply because there is capacity for parking on the immediate road network. This approach can individually or cumulatively alter and detrimentally affect the character and visual amenity of an area and may be considered unacceptable." Given the life of the redevelopment, provision should also have been made for electrical vehicle charging points to contribute to its sustainability objectives. It is also suggested that the access to the parking area at the front of the site would adversely affect highway safety.

It is regrettable that the applicant's architect now proposes an external waste store in a visually obtrusive location, further damaging the appearance of Alexandra Avenue and amenity of 26 Alexandra Avenue.

Finally, the proposed facilities for the storage of cycles for residents represents an unacceptable arrangement in that it would fail to encourage cycle use or provide sufficient capacity in accordance with the Council's Supplementary Planning Document. Furthermore, no provision is made for cycle storage for visitors.

My clients trust that you will have due regard to the issues raised above and recommend that planning permission is refused as a step towards achieving a policy compliant redevelopment.

Yours sincerely,

A black rectangular box redacting the signature of I R Parkinson MRTPI.

I R Parkinson MRTPI