



13 April 2022

Dear Ms Wells,

186 SEA FRONT, HAYLING ISLAND

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

The proposed development is described as 6no. 2-bed apartments and 1no. 1-bed apartment. The submitted drawings clearly show that the proposed development comprises 7no. 2-bed apartments of sizes that exceeds the minimum floorspace requirements under the government's nationally described space standards. It would seem that this oversight has a beneficial effect on the calculation of car parking required under HBC's adopted car parking standards.

The adopted car parking standards provide for the application of two different parking ratios; one for allocated parking [Table 4A] and one for un-allocated parking [Table 4B]. The latter would be appropriate for larger developments where there is economy of scale. In larger developments the reduced standard in Table 4B takes into account the arrival and departure of vehicles and car ownership. In smaller developments, particularly one such as this, it would be expected that on-site car parking spaces will be allocated to individual apartments. In the likely event that each of the seven apartments will be allocated a personal space, only two spaces would be available for on-site parking by visitors.

Unallocated parking means that residents may not be able to find a space resulting in increased movements into and out of the two road access points and cause frustration and arguments. Unallocated parking spread across two different parking areas is inconvenient and would inevitably result in residents defining their "own" spaces. This would seem ever more likely given that access to the rear parking area would be controlled by way of a gate which in itself could give rise to an unacceptable impact on highway safety.

It is therefore considered that on-site car parking for the proposed development should be assessed in the context of Table A. In these circumstances there would be a significant shortfall in on-site car parking sufficient to justify a planning objection. Furthermore, the provision of a sliding gate as part of the access to five parking spaces at the rear would raise a serious concern in relation to highway safety.

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,

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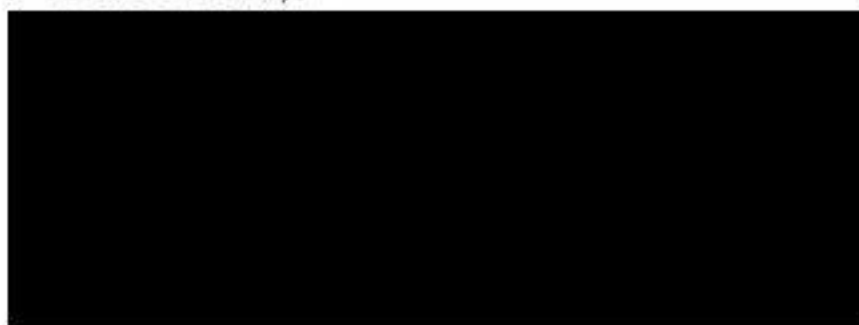
development should not have a harmful impact on the living conditions of residents who would abut or live nearby to new development. This is reflected in Policy CS16 of the Council's Core Strategy and the associated Supplementary Planning Document. However, whilst the latter sets out design principles 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 windows to habitable rooms which look into the first-floor dormer bedroom windows to 26 Alexandra Avenue. A similar situation arises in relation to the rear garden of No.182 Sea Front where increased overlooking would occur. It is considered that the proposed development would give rise to a significant loss of privacy, loss of outlook and overlooking which Policy CS16 specifically seeks to avoid.

At present the applicant has been unable to put forward mitigation measures to demonstrate that the proposed increase in housing would be "nitrate neutral" in terms of its impacts on the nearby Special Protection Areas. Without such mitigation the proposed development would give rise to a sustainable planning objection.

My clients trust that you will have due regard to the issues raised above and recommend that planning permission is refused.

Yours sincerely,

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