



TOWN PLANNING &
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Mrs A Wells, Development Management Team
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Dear Mrs Wells

21 April 2026

LPA reference – APP/26/00105

Site – 2 Bembridge Drive Hayling Island Hampshire PO11 9LU

Proposals – *“Addition of new second and third floors with balconies to first and second and third floors, four storey front extension, new double garage and general remodelling”*

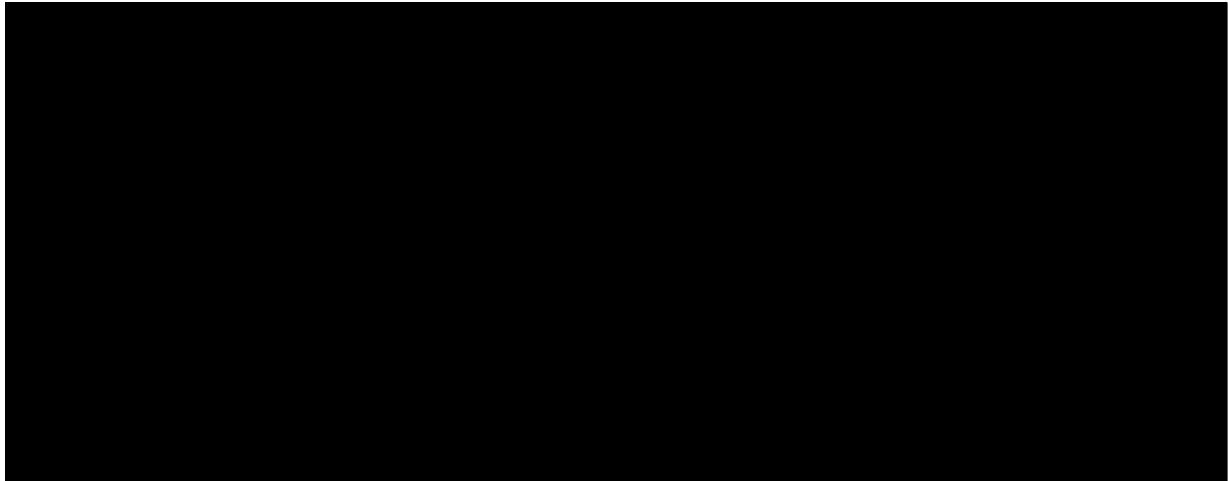
Objection and request that planning permission be refused

Introduction

[REDACTED] to
object to application reference APP/26/00105.

As a precursor to these comments, I understand my client has written to you
expressing concern that [REDACTED]
[REDACTED]

Being as these plans could become legal documents, ultimately specified on a decision notice, can the Council please carefully consider this point to ensure the accuracy of the submitted plans, which should tally with one-another.



It is noted that under application APP/22/00084, the applicant had made a prior approval process application to the Council to assess – “...construction of up to two additional storeys, immediately above the topmost storey of the dwellinghouse, with a maximum height of 12.1 metres, together with any engineering operations reasonably necessary for the purpose of that construction.”

10 letters of objection were received by the Council.

I note that on 23 March 2022, the Council determined that its prior approval was required for such works and that planning permission was refused. The second and third reasons for refusal read –

“2 The proposed development by virtue of the design, scale and height of the additional storeys sited in a highly visible location within the public realm would appear harmfully prominent and visually dominant and massing within the context of both the host dwelling and the wider character of the locality.

As such, the proposed development is contrary to the requirements of Policy CS16 of the Havant Borough Local Plan (Core Strategy) 2011, the Havant Borough Council Borough Design Guide SPD and the National Planning Policy Framework 2021.

3 The proposed development by reason of increase in height, scale and massing, would adversely affect the residential amenities of the neighbouring property, No 4 Bembridge Drive , by reason of appearing overbearing and loss of sunlight.

As such, the proposed development is contrary to the requirements of Policy CS16 of the Havant Borough Local Plan (Core Strategy) 2011, the Havant Borough Council

Borough Design Guide SPD and the National Planning Policy Framework 2021.”

Whilst there are clearly differences in extension shape and massing between what was proposed under APP/22/00084 and what is now proposed under APP/26/00105, I note that the 5th and 6th pages of the Council Officer report for APP/22/00084 stated the following –

“Immediately to the east of the application site is no 4 Bembridge Drive. This property has been re-developed in recent years and is set at two storey level with a pitched roof comprising of multiple rooflight windows on the side (western) roof slope adjacent with the application site. The additional two storeys would add approximately 6 metres to the total height of the property which is considered to result in harmful loss of light to these rooflight windows exacerbated by the very close proximity between both dwellings at approximately 2 metres separation distance. Whilst it is noted the first floor rear bedroom would also be served by windows to the rear, any sunlight from the west would be particularly impaired, notably at ground floor level which already experiences limited light due to the close proximity of the building lines as stated above.”

and,

“The proposed four storey height dwelling within 2 metres of no 4 is considered to be particularly overbearing and dominant resulting an oppressive presence. The windows would allow for some increased overlooking towards the rear garden area of no 4 although it is noted the higher level windows would have more indirect views which would mainly comprise of the beach front.”

and,

“This proposal would result in almost a doubling of the existing property height. The existing property with the flat roof is not considered to be of particularly high quality design and therefore the addition of extra storeys is considered to amplify the prominence of this building in a highly visible location along Hayling sea front.

Although it is noted the apartments opposite comprise of four storeys, these form part of the row of the building line which includes the flats above the shops and cafes along Rails Lane. The dwellings along Bembridge Drive are predominantly two storey in height and any that are higher are not located within as highly visible locations. The proposed four storey height dwelling is considered to visually dominant in an area which forms a focus for tourism on Hayling Island. The appearance would not appear subservient to the host dwelling and would result in an overdeveloped appearance. The proposal is therefore considered, by virtue of its height and design would result in a harmful form of development out of keeping with the host dwelling and the wider character of the area.”

The current proposals tested against relevant adopted national planning policy and Development Plan policies and guidance

National planning policy is found in the National Planning Policy Framework, which at this time is that published in December 2024, as adjusted 7-2-2025.

National guidance as to good design is set out in the National Design guide (2021). Local design guidance is set out in the Borough Design Guide (2011) and more recently 'An ambition for Hayling Island Seafront' (2022). Key objectives of the latter are stated as –

"We want to develop a new approach to managing the seafront to improve the quality of the resident and visitor experience...We want to encourage quality development. This document...aims to...improve environmental quality and urban design of the seafront..." (page 5).

Page 8 confirms –

"Hayling Island Seafront is a key asset for the Borough and a focus for regeneration and positive placemaking."

- with a key design principle being to –

"Protect the unique character of the coastal landscape and enhance the natural environment, supported by a high quality public realm"

The relevant part of the adopted Development Plan (DP) comprises the Core Strategy (2011). The most relevant policies are:-

- CS6.4.a, relating to 'Regeneration of the Borough';
- CS15, relating to 'Flood and erosion risk';
- CS16, relating to 'High quality design'; and,
- DM9 relating to 'Development in the coastal zone'.

A draft replacement local plan (Building a better future) has been prepared. Formal consultation on it ended on 1 July 2025. The plan has yet to undergo formal examination, so only a little weight can be afforded to its policies at this time. The following policies are considered most relevant:-

- 3, relating to 'Regeneration';
- 8, relating to 'Health and climate change';
- 12, relating to 'High quality design';
- 15-18, relating to 'Climate change';
- 26, relating to 'Flood risk'; and,
- 28, relating to 'Development on the coast'.

Main points of objection: -

- impact to the character and appearance of the area, which the Council is seeking to regenerate;
- impact to the amenities of occupiers of adjoining and adjacent dwellings, particularly 4 Bembridge Drive; and,
- lack of information regarding sustainable construction to lessen the carbon footprint of the extended dwelling.

Character and appearance of the area

Very little contextual urban design analysis has been undertaken to inform the design of the tabled proposals. The design and access statement only comprises a single page. There is also no analysis of relevant policy and how this has informed the tabled design solution. The applicant's brief to the agent is not even mentioned.

It is also not clear whether the existing dwelling's foundations could structurally bear the weight of two additional storeys.



Leaving aside the 4 storey height of Bembridge House (just seen behind 2 and 4 Bembridge Drive above and below), which book-ends and adds definition to a street corner, north and opposite 2 Bembridge Drive, development in Bembridge Drive is generally of a 2 storey eaves height.



There are some limited sporadic instances of 3 storeyed, flat-roofed apartment blocks.

Two bungalows exist east of 4 Bembridge Drive with a 2 storey house behind them.

Adding 2 storeys to 2 Bembridge Drive, even with the top storey set-in on three sides, would add considerable height and bulk immediately adjacent to a public footpath leading to the beach. That elevation lacks definition and would appear very monolithic.



The south elevation almost appears as an unsymmetrical glass wall, with poor vertical alignment of the openings as one moves up the building and the glazing framework not even complete in the bottom right hand part of the elevation.

In such a highly prominent position, the additions would appear over-powering and over-dominant relative to the modest plot size, in an area visited by many in the summer months. It considered that this would be very harmful to the character of the area and not assist with positive regeneration of the seafront boardwalk, contrary to Policies CS16 and CS6.4.a of the adopted DP.



Amenities of occupiers of adjoining and adjacent dwellings

In commenting on APP/22/00084, the Council considered the amenities of occupiers of flats in Bembridge House and concluded that there was sufficient separation between those flats and 2 Bembridge Drive, that such a level of impact to outlook and natural light was acceptable. For APP/26/00105 it is also the case that the top storey is also now reduced in width, so what impact there was under APP/22/00084 has been reduced.

However, in terms of impact to occupiers of 4 Bembridge Drive, the impact would still be profound causing 3 problems –

- (a) loss of natural light;

- (b) potential for overlooking; and,
- (c) appearing overbearing when occupiers of 4 Bembridge Drive were using their rear amenity space.

Loss of light to habitable rooms

Right of Light Consulting Ltd, in its letter 4 March 2022 (still viewable on-line), made an initial assessment of impact at the time of APP/22/00084, in terms of a number of windows in the west elevation of 4 Bembridge Drive. Because the angle of obstruction exceeded 25° , it concluded that the Council needed to satisfy itself under PJ Littlefair's "Site layout planning for daylight and sunlight: a good practice guide" (Building Research Establishment, 2011), as to impact to –

- vertical sky component;
- daylight distribution;
- annual probable sunlight hours;
- overshadowing to gardens and open spaces; and,
- sun path diagrams/shadow plots

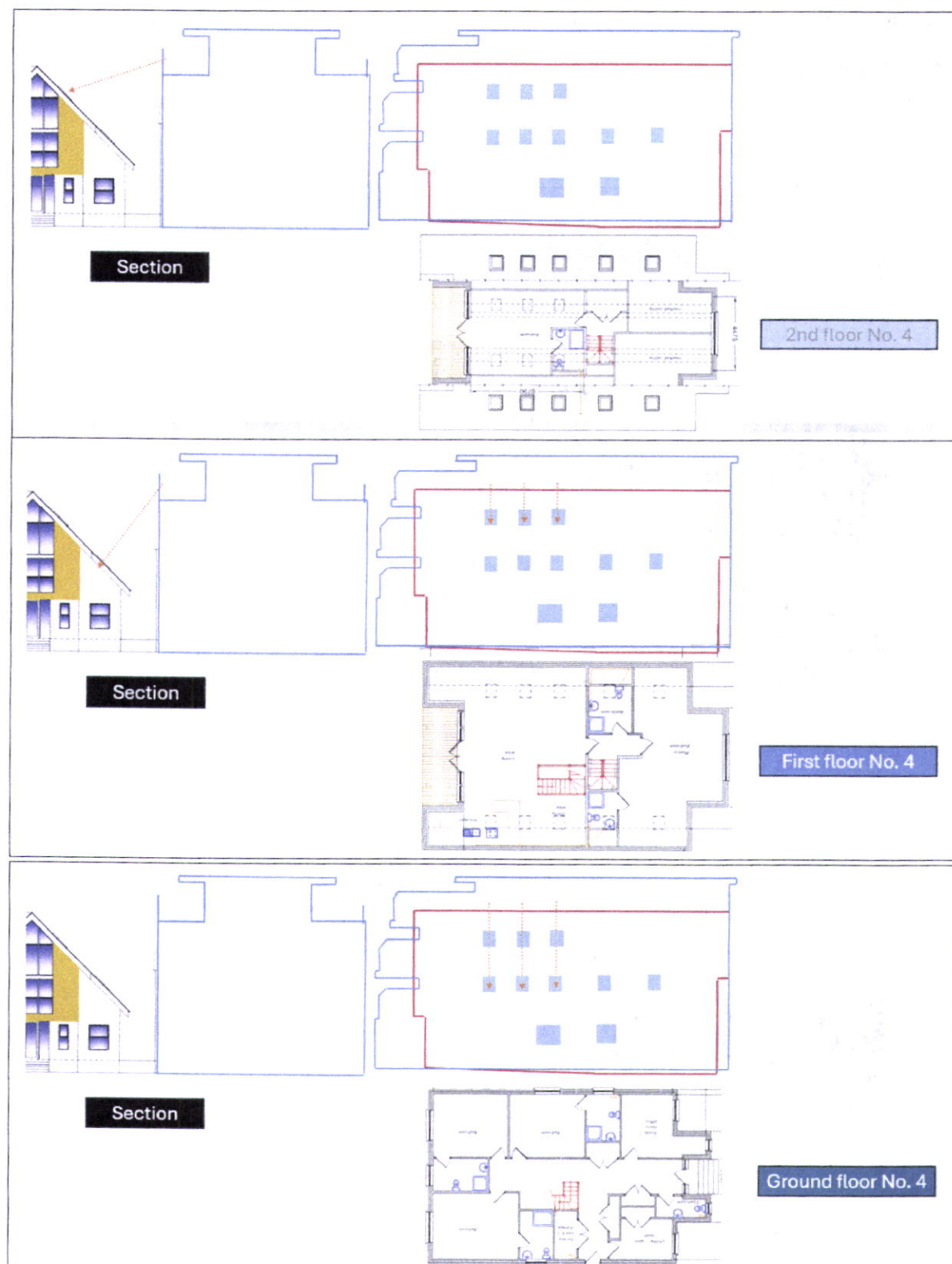
- to those windows, in making its assessment as to the acceptability of the proposals.

The applicant has not carried out such studies and only points to the set-in to the upper storey as ameliorating such impact. That is insufficient proof.



Overlooking

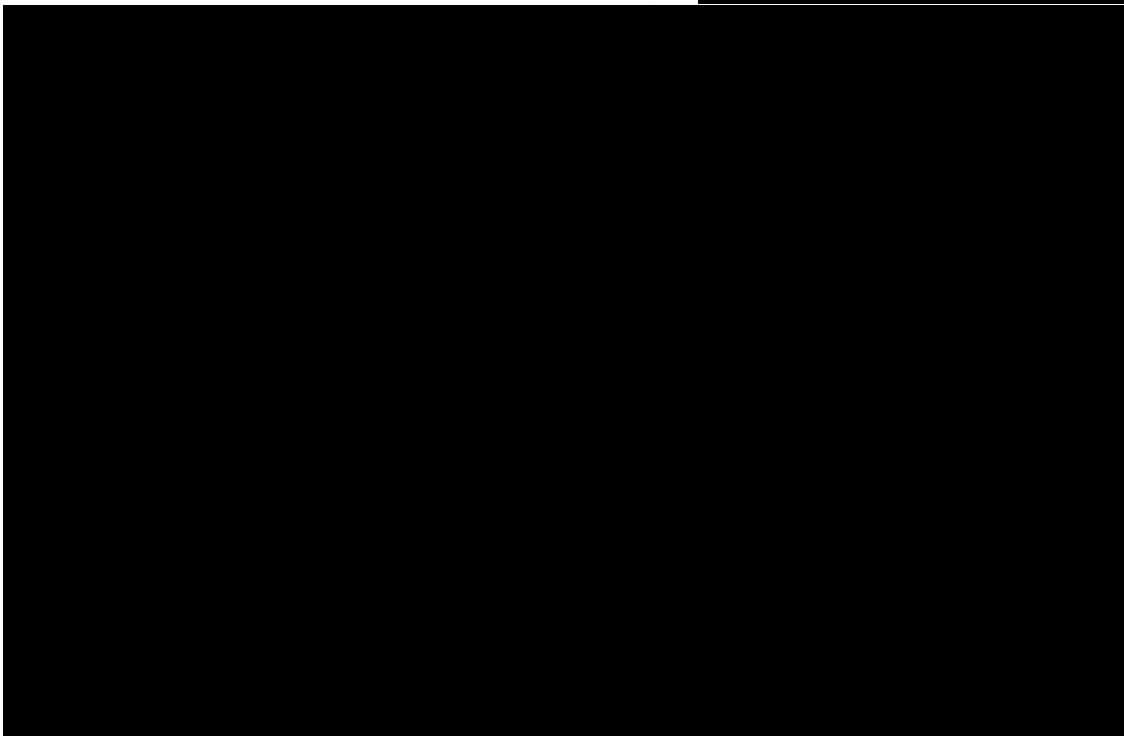
The relative positioning of windows – including rooflights – of 4 Bembridge Drive might have usefully been accurately surveyed and superimposed on the proposed east elevation of 2 Bembridge Drive. A diagrammatic approximation is shown below. The red outline is the silhouette of No.4 and the blue is that of the proposed side elevation of No.2. The blue rectangles are the positions of affected windows in No. 4.



It is noted that obscure glazed screening is proposed at balcony ends and on the edge of the 3rd storey roof terrace facing east towards 4 Bembridge Drive. There is one exception; that at first floor at the front of 2 Bembridge Drive. It is unclear why this has not been specified with obscure glazing to end facing No.4.

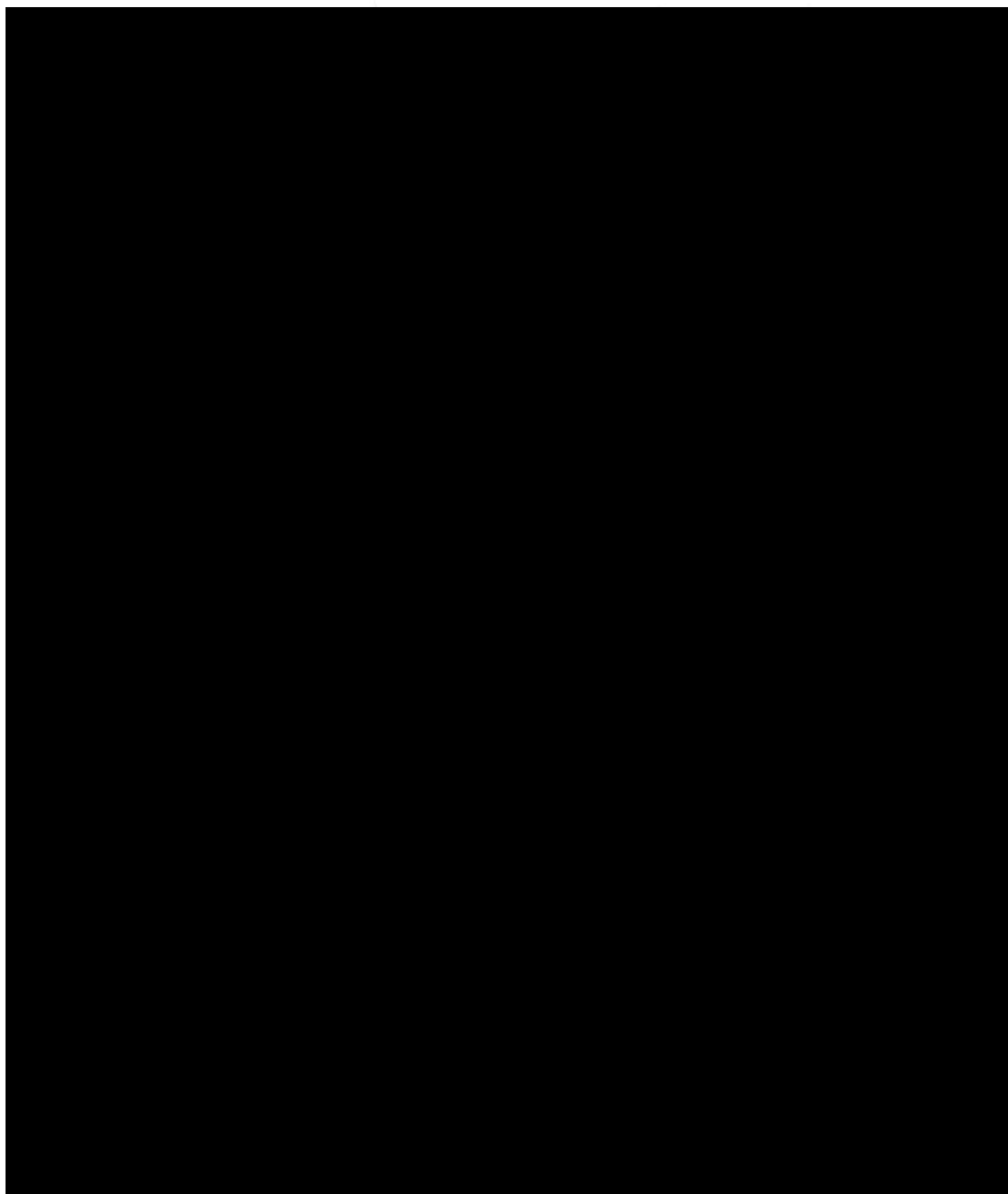
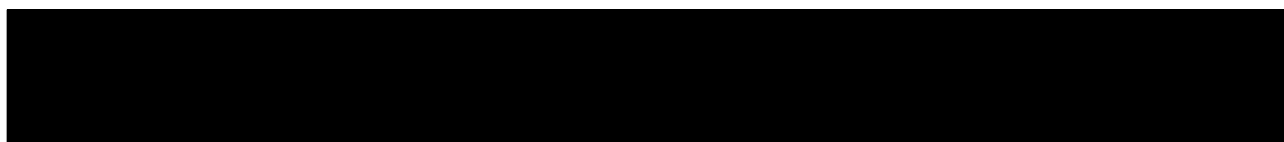
If the Council was minded to approve APP/26/00105, it is essential that the obscure glazing should be conditioned, otherwise very intrusive, downward overlooking through No 4's rooflight windows would occur, seriously affecting privacy.

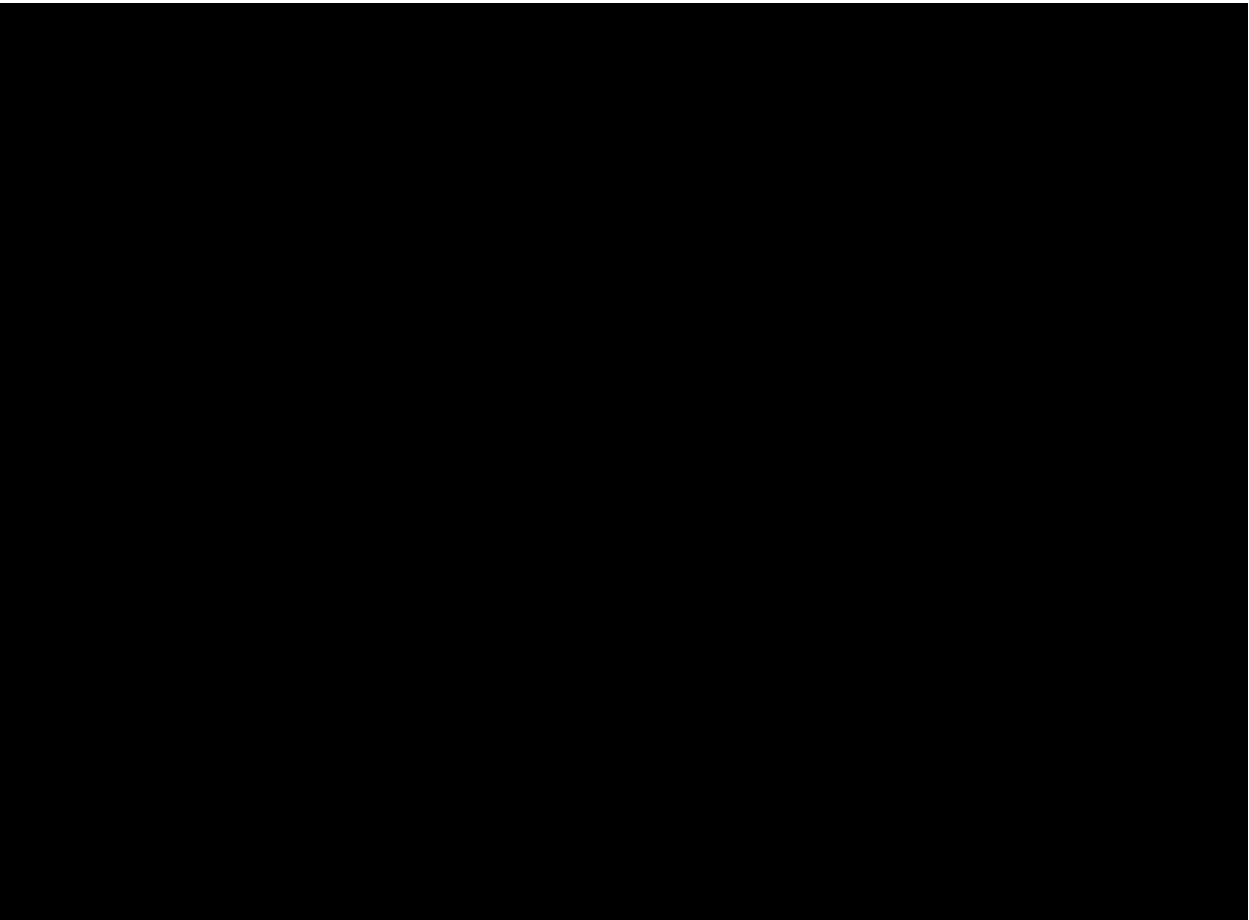
Increased overlooking of No 4's back garden and first floor balcony would result from the upper roof terrace, albeit at an oblique angle, [REDACTED]



Appearing overbearing

The photographs above and below show how overbearing the proposed extension would be to occupiers of No. 4, when using their rear garden.





Whilst another person who has expressed views on the application has referred to approval APP/23/00497 at 18 Bembridge Drive, adding asymmetric split pitched roof elements to an enlarged 2nd floor, that would not create a 4 storey building and separation to neighbouring dwellings is greater, with roof slopes reducing in height towards neighbours. That is not comparable to the 4 storeys proposed next to 2 Bembridge Drive. The 4th storey another refers to at 22 Bembridge Drive, is in fact just a stairwell pod, leading to the roof terrace, not an entire separate floor within a built envelope.

Sustainable construction

The applicant has offered no information as to how the new work and/or modification of the existing dwelling fabric, water usage and energy conservation would reduce the carbon footprint of the site.

Conclusions

The proposed works of extension, over and above that approved under decision APP/23/00518 would –

- harm the character and appearance of the area, also harming the Council's aspirations to successfully regenerate this part of Hayling Island's seafront;
- harm the amenities of occupiers of No. 4 Bembridge Drive, through loss of natural light, additional, intrusive overlooking of their rear garden/balcony and generally appearing overbearing; and,

- not taking the opportunity to demonstrate how the carbon footprint of the site could be reduced.

The proposals do not represent high quality design and peer review by a Design Review Panel, comprised of RIBA Architects, would confirm this, as advocated under paragraph 138 of the NPPF.

The submitted Flood Risk Assessment is noted.

The tabled proposals are considered contrary paragraph 135 strands a), b), c) and d) of the NPPF, where paragraph 139 then sets out –

“Development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides...”

- and to the following DP/emerging DP policies –

Core Strategy – CS6.4 a; CS16 1 a)/c)/e), 3, 6 and 7 [as informed by the relevant parts of section 5.3 of the Borough Design Guide (2011)]; DM9 2/3.

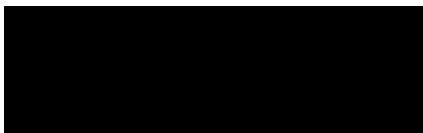
Building a better future – 3 (Hayling Island Seafront); 8 b)/c)/d); 12 a)/b)/c)[i-iii, vi]; 15-18 (insufficient information submitted); 28 c) [i].



The existing dwelling at the site is not of any architectural merit and should be redeveloped or at least re-modelled.

The tabled proposals do not however represent an appropriate means of achieving that.

If approved, this monolithic mass will blight Eastoke Corner for decades and severely hamper the Council and local community's wish to positively regenerate the area.



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Director, ACHIEVE - Town Planning and Urban Design Ltd

CC.



Netty Shepherd – Hayling East Ward Councillor

Mark Coates – Hayling East Ward Councillor

Peter Oliver – Hayling East Ward Councillor

