

COMMENTS ON CANTERBURY DISTRICT DRAFT LOCAL PLAN

By Nicholas Blake B Sc . I make these comments as a local resident: [REDACTED]
[REDACTED]

None of the LP affects my property directly, except in the general sense that it affects all residents.

I have lived in East Kent since the [REDACTED] and in Canterbury District since [REDACTED]

I have over [REDACTED] year's experience of making Planning Applications.

I wish to make comments to the following sections of the LP. The relevant policies are notated, but other comments have been made where policy numbers do not apply, so it is hoped that CCC will also respond to those .

In addition to this text, I submit 4 No. photographs showing: The view of the Cathedral from Stuppington Lane and three views of Hollow Lane which feature the "cliff edge" and A2underpass.

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1 FORMAT OF THE PLAN

1A There is no index to the plan, making it difficult to look up references to issues within the large number of pages.

1B Unlike in the last Draft Local Plan, no land areas are given for the various sites, making an assessment difficult. They should be provided in hectares and acres to be understandable to the public.

1C There are no photographs or drawings in the whole LP. Where maps are provided, they are of a scale that is inadequate to be able to see if the proposals are feasible. How can a LP be put forward without this information? The desire and need to communicate by illustration as well as text, should be instinctive to any skilled town planner, as has been the case all through the history of the discipline since it was created in 1914

2 ASSUMPTIONS WITHIN THE LP

2A . **Housing Numbers.** On page 38 of the draft LP it is stated that “national policies have increased the level housing growth the government expects in our District”

The ONS projections for the period 2021-2036 are that the UK’s population would grow by 6.6 million .

That is an increase of 9.9%, which includes includes 541,000 more births than deaths and 6.1 million from net international migration.

Such a huge constant future level of immigration has not been mandated by public consent. At the time of writing both main political parties are making the case for drastic cuts in net immigration, presumably considering that is what the people want.

The number of new homes proposed in the draft LP is 9346 an increase of 13.5% It is difficult to unambiguously state the number of houses proposed in the plan period, because it would contain many, as yet unbuilt , from the previous plan. The 4000 at Mountfield represent the largest single number in that category.

A total of possibly 7000 could be built from already approved sites giving a total of 24%

It is acknowledged that the number of homes is generated by a government algorithm but the LP does not include an explanation of this.

The provision of vast numbers of additional homes is, presumably intended to drive down the prices of market homes. No calculation of this has ever been provided nationally or locally. If such a significant price fall did occur it would put

house buyers from the last, say 15 years into drastic negative equity and also lead to insolvency of lenders. In practice it would not be likely to happen, as developers would carefully manage their delivery of homes to avoid it. It is noted that the developer of Mountfield expects those 4000 homes to take 20 years from now to be built and that is for a site where planning consents are, in part, extant.

The LP attempts to say that these new houses are needed by “our communities” as at, for example Policy C5 p69 at 2.14 and at p43 “A vision for our District “... “ A range of housing will meet the needs of the district... and support our communities.” From the figures given above, it is clear the most of the housing is to house not just inward migration from other parts of the UK but from international locations. The LP does not make it clear that the number of births in excess of deaths in the UK is about 1% clear, or in any way challenge the enormous figures given.

It is apparent now, since the writing of this LP, that government is very aware of the need to take into account special local environmental issues and it is highly likely that could lead to a rational downward revision of the figures. CCC should pause the LP process to allow for this.

2B HIGH QUALITY DESIGN. Policy SS2

It is stated that “new development should be responsive to the distinctive character and history of the /district”. It is further asserted that “Architecture landscape and public realm must be attractive and function well, establishing or contributing positively to a sense of place, using the arrangement of streets, spaces, building types, form and high quality materials to create welcoming and distinctive places“. “High quality design is a key priority for this plan and it is critical that new development is sensitive to the unique character of our district...” The analysis of each proposed site repeats the mantra, as at Policy C12,

This LP fails to assess if the current LP, which has similar design ambitions including “local distinctiveness”, has achieved its aim. The evidence is being built all around the District right now. Almost every site contains the standard offerings of the national developers. It appears that Planning in our District has achieved no uplift to the quality of building or spacial design. Areas of wasteful and useless open space have been created with no achievement of a sense of place as the

draft LP requests. What has gone so horribly wrong? Has there been no intention to achieve what the LP asked for? There is no methodology in the LP to suggest any improvement. An audit as to whether the current LP has delivered what it intended is sadly absent. That illustrates the gross inability of CCC to be introspective about any aspect of the LP. Past performance is a vital indicator of how the future should be conceived.

2C SUSTAINABILITY Policy SS2

Quite rightly, this is included as an aim in this LP but there is little attempt to define it. Community hubs, to provide local services, are specified at 5 on p 11 and repeated for the main sites with attractive sounding “format of a high street or village/town square” There is no description of how the market is to provide them and at most a Sainsburys Local might arise, if custom is thought to be adequate. A street or square of shops is highly unlikely, at a time when on street shopping is declining because of on line shopping.

In the analysis of each site the assertion is made, that sustainable communities will be created. The south West SDA is said to be “set into a highly sustainable and accessible location...” Generally they are beyond the edge of the built area of the city and contain so much open space, in an attempt to appease lovers of countryside, that they would be difficult to serve by viable public transport. The sites are described as “compact” but this is not the case. Not in one example, is any debate offered as to whether each of these sites is really sustainable. The value of the term is rendered meaningless, as we learn it is only applied because CCC has decided, without reason, that it is the right thing to say.

2 D GARDEN CITY PRINCIPLES

Helpfully, at Appendix 2, there is a glossary but no definition of these principles is included. It is as if we are all aware of them. Clearly, as set out here, our City Council is not, but merely uses the term to make things sound friendly and beneficial.

Every major suburban site is described as being designed with “garden city principles” : yet another undefined term.(“a”) see below. It seems that CCC assumes that the use of the term “garden” bestows benevolence on any site.

The Garden City ,as established as a concept by Ebenezer Howard in 1898, was for self- sufficient settlements in the countryside. The “garden” element, was largely to achieve food production in “a garden” around the “city” . It was never meant as a suburban concept, with Hampstead Garden Suburb, for all its beauty, being a misnomer from the start.

At that time, the number of persons per household was five. At the end of the LP period it is expected to be about 2.1 , so at the same level of house density only 42% of the numbers of persons would be housed in a given number of units, compared to 1898.

All the way through the current LP, the proposed new housing areas are described, as at Policy C12 on p.48 figure 2 (b), as “compact”. However the provision of open space, in an attempt to preserve some of the rural character, mitigates against this principle. In this regard the LP is ill founded, attempting to be all things to all people. It is thus incincere and ambiguous in its aims.

No indication is given as to how the maintenance of these huge new areas of open space is to be achieved or financed. A worrying example of this problem in the recent past is the lack of any provision for looking after the large area of established woodland between the approved Sturry and Broad Oak development sites. The area is to be fenced in with no access, in an area that is short of open space. To add insult to injury, the developer, Barratts has named its site “the Woodlands” as an awful warning. This point applies to the large open spaces proposed in the current LLocal Plan sites referred to below.

The ambience of Welwyn Garden City is a somewhat questionable nirvana to aim for. It rather denies the virtue of urbanism and produces a suburban density throughout with little contrast.

At least in the early “garden suburbs” (sic) and cities we got a good standard of spatial and building design. One large developer working locally, uses watered down “Arts and Crafts?/ 1930’s “ design cues, but only on the front elevations not caring that sides and rears, at every turn, are part of the street scene.

At the outset, the Garden City movement had as its financial basis, that land to be developed would be bought at farmland prices. Howard takes considerable time in his book, to provide the figures and the financial rationale for this, as a contrast to the high land costs in the existing urban areas.

In its compromised format, the CCC “Garden City Principles” (sic), only capture part of the uplift in value from farmland to development land. We are not given any figures or percentages to be able to assess the issue. If past planning applications are a guide the information on this issue is not at all transparent. The Section 106 methodology for achieving so called “developer contributions “ is not at all transparent as to how much of the uplift in land value is available to the community.

Only with virtually full land value capture can “affordable housing” be provided at an acceptable cost but the LP is silent on this crucial matter.

The conclusion of this paragraph is that “Garden City Principles”, even if used in their true 1898 meaning, may not be appropriate to the modern world. In any case the way CCC applies them in the LP is incorrect and misleading. The whole issue needs an open and frank public debate in which it is hoped CCC will engage.

3. TRAFFIC PINCH POINTS.

3A Within the LP, no attempt is made to identify the existing “pinch points” within the district or to predict where future ones might occur because of the implications of the LP

3B A few might be suggested.

The bus station, said ten years ago by Stagecoach, to be at capacity.

Broad Oak Road and St Stephens roundabout

Nackington Road (see below)

Whitstable Road

Tyler Hill.

Roads through the University of Kent area.

Old Dover Road / Nunnery Fields/ South Canterbury Road

Homersham

Hollow Lane

Further locations within rural areas

3F It is not known whether adjacent Districts have such enormous housing targets. If the population of Kent increased by the same amount that would be an additional 600,000 inhabitants. It is likely that many of them, especially from districts bordering Canterbury would want to access the city

3G The informal predictions in this section are a totally inadequate input and CCC should include a proper analysis in any revised LP. It is a gross omission that this is not already included.

4. STRATEGIC DEVELOPMENT AREAS

4.A It is not proposed to comment on all these areas other than as far as my observations relate. This is not to be taken that they are therefore endorsed.

4.B LAND AT MERTON PARK Policy C6

This site was said to be 99.67 ha (c 250 acres) 0.4 sq mile in the last Draft Local Plan

It is a very visually pleasant rural lung to the city, which forms one side of the “saucer” shape, often used to describe the setting of Canterbury. It is a part of the Stour valley and from the built up areas of the city, forms a backdrop of countryside and a setting for the WHS.

Views of the cathedral from Stuppington Lane are surprisingly unspoilt with the existing developed land in the Wincheap area, as if by magic, not at all dominant. Miraculously, it is like a medieval view that has been delivered to us by fortunate accident. Regrettably, our planners at CCC seem to believe in none of these, for them, over-romantic thoughts. On page 42 at their 3(j) they claim that they will “preserve and enhance views towards the City and World Heritage Site with provision of viewing corridors from open space and PRowS crossing the site.” A “corridor” implies a very confined unacceptable space, not a landscape setting as exists currently.

They attempt to illustrate these on the map provided on p 42. However three of the indicative “views” arrows, seem to be embedded within housing development, with no open space to secure the view. Two of them additionally, have the view blocked by what is shown as a “community hub” which we are told will be a “square or village street”. A fourth appears to be more open, being sited within the compromised landscape of a new proposed Park and Ride facility, thus giving a very alien setting.

The current view of the Cathedral, north from Stuppington Lane, of which a photograph is attached, is ignored completely. Earlier, it has been noted that the LP contains no photographs, so its fortunate that readers of this can see some! It is quite disgraceful that our planners could not take the trouble to produce their own.

Confusingly at the top of p 16 , an area referred to as “Stuppington” is classified as a Local service centre but no other “community hub” is so designated. All the other places so designated are villages. Is it therefore seen as a centre for serving a large an adjacent area rather than just for the community (see 1 (iv) on p 3?. If so this implies even more traffic.

At CCC’s 3 (c) (d) (e)(f) (g) (h)(i)(j) p 38, measures are described but of course not drawn, in an attempt to preserve some of the rural character. In each case the caveat “ where possible” seems to apply, so they are totally uncertain and speculative in nature. A developer would probably soon outwit our council regarding these issues.

The topography of the site is mentioned above and the Ordnance /Survey map shows us that the levels fall from the by pass, near its junction with Stuppington Lane, to the edge of the built up area of Wincheap, by 35 metres in a distance of half a kilometre. That is gradient of 1:14 just slightly less than the permitted maximum 1: 12 for residential roads. Housing on this hillside will be overtly prominent and will necessitate invasive alterations to existing ground levels. The kind of visual damage this causes, can be seen on the recently excavated part of the Cockering Farm development, except it seems by our planning staff at CCC.

As if the visual damage caused by developing this site is not enough, the traffic and access implications are even worse and it is impossible to see how they could work.

It is unclear how residents of the 2075 homes are to gain access to them from the Canterbury side. At CCC’s 4 (f) p 34, it is blandly stated that it will “provide a transport assessment to demonstrate the connectivity of the site with the existing highway network ,any necessary mitigation and measures to minimise the need for the use of private cars”.

This is a totally unacceptable part of a LP, as it gives rise to doubt and indicates that CCC has no more idea of how to solve the issue than any casual reader of the LP. At CCC’s 4(g) they say they will “investigate the downgrading of Stuppington

Lane within the site to non motorized /recreational use / access only, in combination with opportunities for similar changes to other historic lanes around the site”.

As Stuppington Lane is currently a single track carriageway their ideas have a logic but again are couched in uncertainty. No mention is made of which other lanes might be so altered.

This lane, currently is the only access to the site from South Canterbury Road and it is difficult to see other points where access might be made except nearer to the hospital

In any case, South Canterbury Road in the north westerly direction, leads to Nunnery Fields with its intrinsic “pinch point”and the already at over- capacity junction with the Old Dover Road.

It is noted at CCC’s 4(e) that the fast bus link, which was part of the Mountfield development, might serve Merton Park but these clauses are ambiguous and thus uncertain. It will be remembered by many residents, that the fast bus link was a dubious concept because of the very “pinch point” issues set out above. In the eight year period which the fast bus has been CCC policy, there is still no route for it from Nackington Road, except through the Chaucer Hospital Car Park and no evidence of that landowner being prepared to deliver it.

Additionally now, we have the proposal that there will be an additional Park and Ride facility for a minimum of 500 cars on the east of the Merton Park site. 3 (d) but again with no indication of how it is to be accessed. To impose that extra traffic on Nackington Road would seem very unsafe in highway terms.

Within the Merton Park site, we now have the intended provision of an on and off access to the A2. It will be remembered that a previous plan showed an off slip from London sited at Wincheap which seems to be retained but it has a format that local people knew was totally unsafe. CCC and KCC ignored those comments but eventually Highways England refused to accept it and the matter was left

unresolved. It was to be financed by the developer of part of the Cocking Farm site. It would seem unnecessary to have two junctions to the A2 so close together.

That seems to be, in part, why CCC is proposing the South West Canterbury link road (SWCLR), whose devious route can be seen on the maps on pages 33, and 35. Other maps have been produced and shown by CCC showing variations, but their status is not known.

A very noisy residential zone would be created between the existing A2 and the SWCLR.

Providing the new on and off Dover direction slips of course gives only partial access for Merton Park. Traffic has presumably to travel to the new Bridge At interchange and return to go towards London.

None of these highway design maps is of adequate scale to be able to properly assess their viability, so it is possible only to speculate about important details. At a meeting with officers, they suggested that as the ideas shown were “only indicative”, that any problems seen now may not exist.

The public is thus being asked to comment on plans which are vague, maybe incorrect and thus liable to alteration. This thinking seems to pervade many parts of the LP and does not present a responsible realistic document. Again it is unsafe uncertain and it has to be said, unprofessional.

Once at the north west edge of the Merton Park site, the SWCLR hits Hollow Lane, presumably with a roundabout. The only route from here to Wincheap is through the road known as Hovenden. This is a road built only to residential standards and surely not fit to become in effect an “A” road?

In the other direction, for about 400 metres, (no scale shown on the LP drawings) the SWCLR is on the line of Hollow Lane, thus destroying the historic character of this medieval “Holloway”. The first part of it has residential property on one side which will thus be blighted. The route appears to use the existing A2 underpass

which is set at 6.3 metres below the A 2 carriageway. The plan then shows it veering south west through the 6.3 M high chalk bank, needing a ramp of about 72M in length, with visually intrusive embankments and retaining walls.

At Policy C11.1. it is blandly stated that “land is safeguarded for the provision of a new South West Canterbury Link Road”. Furthermore at C11 12(d) the “upgrading of Hollow Lane to provide vehicular connection between sites C6 and C7” is threatened without any assessment of the visual damage that would be caused.

Photographs of Hollow Lane are attached to illustrate these issues because of course, CCC has not provided any.

Beyond this point the SWCLR takes a devious route through the housing sites but again with no detail shown. If there is any link from the A2 through the housing sites, it is not indicated.

Above, it is mentioned that CCC wants to take protective measures for “historic lanes” around “Merton Park but not it appears for the most notable one of all, Hollow Lane. At their 4 (i) CCC in the last Local Plan it was suggested that improved walking and cycling connections ... “via Hollow Lane”, were mentioned, which are now omitted.

In the Local Plan 2017 a policy T16 states that “rural lanes which are of landscape amenity, nature conservation, historic or archaeological importance WILL be protected from changes and management practices which would damage their character and where possible be enhanced”.

CCC does not even mention that Hollow Lane is a Saxon “Holloway”, or the above policy. Again, it appears that CCC has done an inadequate job and has not referred to its own policy. It is likely that the Canterbury Archaeological Trust will comment adversely on the intended damage to Hollow Lane.

Conclusion re the Merton Park Site Policy C6

It will be seen from the above that on the following grounds this site demonstrates no viability.

Very poor and unexplained connectivity.

Visually intrusive and damaging to the setting of the WHS

Poorly conceived and unworkable SWCLR

Grossly unacceptable damage to the historic Hollow Lane

4B LAND TO THE NORTH OF HOLLOW LANE; POLICY C7

The above comments regarding the portion of the SWCLR relate to this site.

It is a very open site, said in the last Draft Local Plan to be 40.89 ha (102 acres), visible within the countryside with no natural screening. There is a very significant unobstructed view of the Cathedral from New House Lane, to which attention is not drawn on the map on p 33 but there is mention of the need to “preserve and enhance views towards the City and World Heritage site with provision of viewing corridors...”

As with Merton Park, it is not understood how developing this land assists with these aims.

It is not clear from the inadequate drawings, how the development relates to that currently being built to the north- west. It would seem to concentrate too much development at Thanington

4C LAND NORTH OF THE UNIVERSITY OF KENT: Policy C11

This is a new allocation of development land which was hinted at in the last Draft Local Plan at policy C25, which said that “ the university of Kent’s landholdings to the north of Canterbury may present an opportunity in the longer term to deliver improved highway connectivity to the north of the city and facilitate the completion of an outer ring to compliment the Canterbury Circulation Plan”

No housing was mentioned and the ambition to have an “outer ring” has been abandoned after public pressure. Now 2000 houses are proposed with an inadequate highway access provision. The two access points are proposed to the west side with at 4 (e) an unspecified design to “minimise traffic flow onto Tyler Hill Road in both directions”. Clearly this is an acceptance of the inadequacy of that road and Tyler Hill, to take additional traffic. By so doing of course, the three communities of Tyler Hill, Blean and Rough Common lose their important connectivity. No mention is made of this result .An enhanced junction with the A2, is included at 4(f)which needs at 4(e) “ highways improvements to Rough Common Road”. This road for a considerable length, is lined with residential property which will be blighted and adversely affected by such works, but the Local Plan does nor analyse this problem

At 2(b) the development is described as “compact” and yet just before that, 2.17, the development is described as taking “a linear form”. As shown, it is over one mile north to south which, with its detachment from the built area of Canterbury, makes it difficult to serve with amenities. At its northern extremity, accessed via the route through Rough Common Road, the distance to Canterbury centre is four miles. The shift towards cycle use will be severely challenged by the long uphill route out of the city and further hills in Blean. The provision of a community hub, not very far from the existing shops, sets up an unhelpful competition. The existing shops have passing trade whereas the new “hub” will not and yet the development, without any reason is described at 2.15 as “highly sustaibnable”.

At Policy SS3,4, it is stated that within the boundaries of Rural Service Centres (including Blean) “...existing community facilities and services including within the designated Village Centres, will be protected and enhanced to support the vitality

of these important rural centres.” This must be a piece of a previous policy carelessly carried over into the new Draft Local Plan but rendered undeliverable.

There is some ambivalence regarding the nature of the new community. At 2.15 it described as a “freestanding settlement” and yet the, albeit inadequate, map provided shows a gap of only about 200 metres to the built area of Blean and approximately 100 metres to the built area of Tyler Hill. These are totally inadequate green gaps.

Developments in the villages are prefixed with a policy number starting with “R” but the Blean site has the prefix C, indicating that officers consider it to be part of the Canterbury City area. Conversely in the Development strategy, p 17, Blean is described as a rural service centre.

Conclusion re Policy C11

There was some input from the public consultation of the last Draft Local Plan that a new settlement somewhere in the District MIGHT be an opportunity. However that gave absolutely no sanction for this site. In spite of this in the “Development Strategy” p. 15 it is stated that “Taking account of the responses to previous consultations, the plan also identifies land for a new settlement to the north of Canterbury.” This is seriously misleading and a grave error which will be challenged if it remains within the LP. The LP should put forward its case fairly with recourse only to facts before it makes what are necessarily value judgments. A public apology will be called for after June 3rd on this matter.

As has been shown above it is NOT a “freestanding settlement”. Because of all the constraints of:: protected woodland, SSSI’s, AONB, protected views, the nearness of adjacent existing settlements and the location bordering the coast, it is very likely that there is no site suitable for a new settlement within the Canterbury District.

This C11 site has been put forward with no community engagement and involves a draconian intervention between the three existing communities. The demolishing of the existing school and its replacement has met with tremendous

opposition because of the disruption that would be caused. Their strong objections have been made very manifest during the period of consultation.

It is possible that some minor development in the proximity of Whitstable Road, where it extended the existing developed area, could be acceptable but only of a minor nature. A 2000 home settlement is completely unacceptable.

4D BREAD AND CHEESE FIELD Policy R5

This site is at the S.W. side of Hersden and is proposed to contain 150 new dwellings. The footprint of Hersden as existing and recently extended demonstrates low quality planning, as it is dispersed along the A28, which carries over 20,000 vehicles per day. The community amenities are also not focused clearly on a centre. At 1 (b) "consideration of need for additional local shopping and community facilities" is proposed which will further disperse facilities and compete with those existing and separately proposed.

There continues to be no attempt to create a nucleated community, quite contrary to 2(b) and (c).

In addition R5 destroys an important green gap between Hersden and Westbere but the Plan is silent on this.

4 E THE HILL LITTLEBOURNE Policy R7

The proposed new road from Bokesbourne Lane to the A257 removes the existing dangerous junction. Is it likely to increase traffic on Bokesbourne Lane? Has any modelling been carried out? However it is also feared that it will give a very suburban approach to the village dominated by intrusive and visually inappropriate highway design elements. If the city council could be relied upon to require very high quality design, this problem could be addressed but given the low quality designs that have been approved in recent years, this seems unlikely.

As with other sites, new shopping and community facilities including a shop/café are proposed. It is unlikely these would be commercial and in any case would provide a threatening competition to the existing shop/village hall.

4 F LAND AT THE PADDOCKS, SHALLOAK ROAD, STURRY Policy R10

This site is to the west of the visually intrusive site within the last approved Local Plan. It has been in and out of that development and it destroys yet another part of the already virtually removed green gap between Canterbury and Sturry.

4 G LAND AT GOOSE FARM ,SHALLOAK ROAD BROAD OAK Policy R14

This is yet another development at Broad Oak which has already taken a huge amount of housing. Unlike the main Broad Oak site already approved, which is between two already built up areas, by contrast site R14 extends destructively into open countryside and is not acceptable.

4H LAND FRONTING MAYTON LANE BROAD OAK Policy R 16

My comments as at R16 apply.

The three sites as above are not justified and produce unreasonable harm.

5 RESIDENTIAL DESIGN: POLICY . SS2 & DM11

CCC's 2 (b) p 251. Many modern homes are built with inadequate spacial standards but it is perverse that only one minimum is contained in the draft LP. "Minimum floor to ceiling height of 2.4 for new build to allow for good daylighting" is requested. This is not well thought out, as good daylighting relates much more to window size, orientation and the "sky component" than to ceiling height.

Ceiling height dimensions are a matter for the Building Regulations , not the planning system.

A blanket rule that ceiling heights should be 2.4 metres would preclude the provision of rooms within a roofspace, a concept which has allowed three storey houses without an overly high volume, increasing the efficient use of land.

The ceiling height of 2.4M has been the ubiquitous norm for the last 70 (?) years for no other reason than it is the standard height of a plasterboard sheet .

In terms of creating interesting elevations, varying ceiling heights should be encouraged, as this is something that just does not occur. Virtually every house, at any price or size, has a 2.4 M ceiling.

Many period homes commanding prices of over £1 million have some ceiling heights of as little as 2 metres. It is felt that a minimum height of 2.1 M is appropriate for the first floor of a dwelling. It can be argued that the greater the occupancy and /or size a room has, the higher should be the ceiling, on grounds of ventilation and visual proportion.

If the overall height of dwellings was kept the same, how much more creative and responsive it would be, to have a ground floor ceiling of 2.7M and a first floor of 2.1M

If as at Policy SS2 3. Development should :

“be responsive to the distinctive local character and history of the District “
Let us not have the dull uniformity of unthoughtout policy, imposing a 2.4 M ceiling height.

Victorian houses often had a 2.7 M ceiling height to allow sufficient space above a hot gas lamp.

This is a very harmful policy and is considered to be “Ultra Vires” for a Planning Department. It should be struck out to avoid further legal action.

In terms of energy saving, house design should relate to the orientation of the building and this not be the same no matter which way it faces. Solar gain from facing from S- E to S-W should be a design factor. This should be an additional policy in SS2, p 11

Nicholas Blake 1st June 2024 (final version as sent to CCC)