

[REDACTED]

From: CAROL [REDACTED]
Sent: 09 November 2018 21:11
To: Planning
Subject: Planning application Y18/1242/FH Subterranean Dwelling Hoad Road
Attachments: Hoad Road 2.pdf

Please find attached letter of objection re above planning application sent from
Geoff Hogben and Carol Hogben ([REDACTED])

[REDACTED]

Sent from my iPad

The thrust of both national and local planning policy is to avoid development outside of defined settlement boundaries. Paragraph 79 of the NPPF calls for planning decisions to avoid isolated homes in the countryside. In the case of this application the only conceivable exception is Paragraph 79e which the Agent has used for justifying such a development.

This requires that “the design is of exceptional quality, in that it is truly outstanding or innovative, reflecting the highest standards in architecture”. Although the Agent has pointed out that it is not a requirement to achieve both criteria they make the argument that the proposal “forms an outstanding piece of architecture whilst incorporating innovative technology.”

We would respectfully make the argument that the proposal fails to meet either criteria.

Firstly the argument is put forward by the Agent that the technologies incorporated into the proposal are ‘innovative’ and therefore meet the criteria set out in Paragraph 79e, these being the use of a heat recovery system, solar energy and biomass. We would point out that MVHR systems are not new or innovative, and is now one of the most common methods of ventilating / heating new build properties, being installed in both general market and affordable housing. The use of Solar Energy and Biomass to provide heating is again nothing new or innovative, the principles of which have been around for centuries, if not millennia. Many homes now being built achieve zero carbon status so again the ambition to achieve this is not innovative. In addition the use of Sustainable Drainage as proposed is not pioneering being that SUDS is a mandatory requirement for all new development under the building regulations.

Secondly the argument that the proposal is an outstanding piece of architecture is questioned. The design and concept of underground houses is again nothing new with countless examples already conceived and built out ranging from Neolithic settlements to contemporary designs. Therefore the design concept of setting the dwelling below ground is not outstanding, rather replicating what has already gone before. What is noticeable about more contemporary ‘underground homes’ is that they offer some accommodation above ground to give connectivity and outlook to their environment. In the case of this application all living accommodation is set below ground with only sunken light wells or modest courtyards to provide a connection to the outside. Whilst it is not uncommon for similar dwellings to offer subservient spaces and even bedrooms below ground, what is evident is that principle living spaces are well linked to the outside. It is questioned whether a fully subterranean home as proposed provides a comfortable living environment, not just for the applicants, but for future users which is the true essence of good design and sustainability. Good outlook, aspect, and connectivity to its surroundings are all important considerations for housing design generally, yet alone a scheme which is aspiring to be truly outstanding.

On Friday 28th of September the applicant installed a farm gate which leads onto Hoad Road without the necessary permission. In order to do this mature trees and hedging on Council land were cut down. Whilst we recognise that, at the moment, the gate is not fully functional as tree stumps and roots remain it is evidently intended to be the main access. This access is very close to the main A260 junction which is a known accident black spot. Not least because it is impossible to turn into Hoad Road from Folkestone without driving on the right hand side of the road because of the nature of the sharp hairpin bend causing traffic approaching from behind to have to slow down considerably. We note that highways are currently objecting to the proposed access until such time that adequate vision splays can be demonstrated or a traffic survey is undertaken to demonstrate that a new access onto Hoad Road would not impact on highway safety. Given the length of vision splays required, considerable existing planting would need to be removed or cut back which would have a detrimental visual impact on Hoad Road. Assurance is sought that if a new access is granted, a condition will be added that requires the required vision splay to be achieved and maintained.

Although not in itself a material consideration for refusal, there are a number of questions over the general design and compliance with building regulations with the proposal. The proposed combined vehicle / pedestrian access road which slopes down to the lower ground level measures off on the drawings at circa 30m long, falling by circa 3.8m. This gives a gradient of less than 1:8. This is evident on Section C-C on the proposed section drawings. This is steep for vehicles and falls well short of Part M compliance which requires gently sloping access for Wheelchair users to enter the dwelling.

In addition there is a requirement to provide protection from falling which the proposal does not address. The proposed courtyards do not provide guarding to prevent someone falling into them especially around the area that provides an outdoor amenity area. To achieve building regs compliance some sort of guarding or railings would need to be provided around these courtyards to prevent someone falling off the roof into them. Such guarding would need to be set above ground level and therefore visible from around the site nullifying the concept that the house cannot be seen. There is a real danger that if consent is granted to the proposal in its current form the applicant would need to come back for amendments to the scheme to achieve compliance with the building regs and as a result the scheme would substantially impact more on the landscape and its setting than is currently portrayed.

We notice that Highways have now posted their comments online and have made requested changes to the level of parking and the requirement to provide more onsite turning than has currently been designed for. This required change to the scheme demonstrates the lack of design rigour undertaken and undermines the claim that this is a truly outstanding design. If it were truly outstanding such design changes would not be required.

Our concerns for this proposal have been reinforced by the supposed eco-house permitted further down Hoad Road which did not observe or adhere to the planning consent conditions. There is a danger that should this proposal be granted the scheme does not deliver on its design objectives.

The above sets out a justification as to why the scheme should be refused being that it fails to demonstrate that it is either innovative or outstanding. If however the planners are mindful to support this application on the grounds that it meets the requirements of Paragraph 79e we would respectfully ask that the scheme is put to a Design Review Panel for it to be critiqued to ensure that it is considered to satisfy being an exceptional dwelling.