

Hoath Parish Council response to Canterbury City Council's consultation regarding draft Local Plan 2040 (Regulation 18)

3rd June 2024

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On behalf of HPC

Dear Colleagues,

HPC appreciates the significant efforts Canterbury City Council has made to revise the draft local Plan 2045, especially the updating of key evidence documents such as the Nutrient Mitigation Strategy, Climate Change Topic Paper and Development Topic Paper.

We have also appreciated the briefings by CCC officers over the past 18 months which have achieved a greater feeling of collaboration between the Parish Council and CCC.

General Thoughts

In the midst of climate change and biodiversity loss, Hoath can be a “green lung” for the northern part of Canterbury District, a counterbalance to the AONB in the southern part. The dark skies map (Figure 3.10, levels of dark skies and light pollution, Canterbury Landscape Character Assessment and Biodiversity Appraisal, 2020) illustrates this; Hoath Parish is a dark island surrounded by the light of encroaching development.

In general, we appreciate the positive approach for the Parish, expressed in the Strategic Objectives for the District. Three of them resonate particularly:

- Protect and enhance our rich environment and valued landscapes creating a network of green spaces, protecting and enhancing green gaps between settlements, supporting nature's recovery and biodiversity and improving the health and wellbeing of our communities
- Create a transport network with a focus on district-wide public transport and low-carbon travel to improve air quality and people's health while ensuring excellent access to city and town centres on foot, cycle and by public transport
- Support the sustainable growth of our rural communities through the provision of affordable housing, community facilities and public transport infrastructure while taking advantage of opportunities to protect and grow the rural economy.

Ensuring “housing is of high-quality design, is low-carbon and energy and water efficient as part of healthy communities with easy access to community facilities and open space” is also encouraging.

We are also delighted to see echoed SS1, point 5, “Development across the district will need to incorporate measures to deliver a minimum 20% biodiversity net gain in line with Policy DS21, having regard to Biodiversity Opportunity Areas and/or Nature Recovery Networks.” Point 6 expands the ambition to include trees and hedgerows.

Please do ensure that these aspirations become reality and are monitored. They are critical to the success of policies DS17 to DS23 and the future.

We are also pleased that there is more focus on our rural communities than in the past – “the district has a large rural hinterland which is home to many villages and hamlets” -- and the significance of our landscapes is acknowledged. Maintaining a balance between rural and urban priorities of our district needs regular monitoring, however.

Landscape, wetlands, biodiversity

HPC supports SS1, points 2, 3, 8 and 10. Point 3 states the “council will work with its partners to support and sustain the full recovery of the Stodmarsh Nature Reserve designated site and to meet its targets for water quality and improve biodiversity.” This ambition is echoed in later policies.

However, as Hoath Parish includes landscape designation B2 (Nethergong-Sarre Penn Inlet) which adjoins B1 (Chislet Marshes), we think it important for Canterbury’s Local Plan to clarify the topography of the **Stour Catchment**. As it stands, it is not clear in the Local Plan how all-encompassing the Stour Catchment is, that it stretches from Reculver to Sandwich (the Wantsum Channel AHLV, DS 19) and goes up both sides of the Hersden Ridge, on one side is Stodmarsh, on the other the Sarre Penn which flows through the Stour Valley. The Sarre Penn and River Wantsum (Stour Marshes) are part of the Stour Management Catchment Area as is Stodmarsh.

In addition to the development policies noted below, the following environmental policies are affected: SS1, DS17, DS18, DS19, DS20, DS21, DS22, DS23 and C20.

Once this is taken into consideration, it becomes clear how the following developments with associated landscape designations, from the 2020 Canterbury Landscape Character Assessment and Biodiversity Appraisal, have the potential to create biodiversity problems for the still relatively untouched wetland and waterways in the Sarre Penn Valley.

The following policies could be the source of significant environmental problems if drainage is not forensically analysed and policies applied: C12 – Land north of the University of Kent (F2 Stour Valley Slopes), R14 – land at Goose Farm, Shalloak Road (F2: Stour Valley Slopes, R15 -Land at Shalloak Road (F2: Stour Valley Slopes), R16 – Land fronting Mayton Lane (F2: Stour Valley Slopes) R17 – Broad Oak Reservoir and Country Park (E2 Sarre Penn Valley), R18 – Land at Church Farm (H2 Hoath Farmlands), R6, Land at Hersden (F3 Hersden Ridge, H2 Hoath Farmlands).

Policy DS23 – The Blean Woodland Complex, point 5, is an example of the recognition of the need to take care when it states that “proposals for development on land surrounding the Blean

Woodland Complex, including Policy C12 (Land north of the University of Kent) and R17 (Broad Oak Reservoir and Country Park) will need to ensure that development does not adversely affect the landscape, ecology or setting of the Blean Complex.

With the preceding in mind, HPC **urges** CCC to revisit the environmental and development policies and proposals noted above and consider them in the context of the overall ecology of the Stour Catchment area which also includes the Stodmarsh Nature Reserve.

Renewable Energy

HPC is keen to mitigate the impact of climate change and strengthen the area's biodiversity in the interest of preserving this historic area for future generations: H2 Hoath Farmlands; B2 Nethergong Sarre Penn Inlet (the Parishes wetlands); C4 Ford and Maypole Mixed Farmlands; D4 East Blean (Canterbury Landscape Character Assessment and Biodiversity Appraisal, October 2020).

In this spirit, HPC supports the intent of SS1 (Environmental strategy for the district), however the aspirations of point 9 regarding renewable energy and the related policy, DS25, raise significant questions. For reference, point 9 states:

“[Opportunities](#) for carbon sequestration and for the development of renewable and low-carbon sources of energy will be actively supported within all new developments. Large scale carbon sequestration and renewable power generation applications will be encouraged in line with Policy 25.” (Renewable energy and carbon sequestration)

The **Local Plan Glossary defines Renewable Energy** as including “energy for heating and cooling as well as generating electricity. Renewable energy covers those energy flows that occur naturally and repeatedly in the environment – from the wind, the fall of water, the movement of the oceans, from the sun and also from biomass and deep geothermal heat. Low carbon technologies are those that can help reduce emissions (compared to conventional use of fossil fuels).”

In light of this definition, why does Policy DS25 not incorporate relevant energy and location related elements of policies DM13 (Biomass technology), DS12 (Rural economy, points 1, 2 and 3) and R19 (Countryside) and the policies related to landscape and biodiversity (DS 17 to 23)?

In other words, while addressing the strategic objective to reduce carbon emissions and “increase energy resilience” constraints on how this will happen are undefined. This is concerning given the speed with which the areas of renewable energy and related technologies, as defined in the glossary, are evolving.

As a result, DS25 is a potential threat to the countryside and rural communities. Sweeping aspirations are unsupported by criteria with which to assess the short-, medium- and long-term impacts, for example, of “free-standing energy installations” from planning, construction to servicing on rural infrastructure (e.g., highways and local roads), homes, heritage (DS26), community wellbeing and safety of residents, preservation of BMV land (DS12), and landscape and associated policies. We suggest any such installations should be restricted to brownfield sites or poor quality land.

DS25 – renewable energy

We support all community involvement in the development of any renewable energy installations and the importance that there should be community benefit (Points 3, (b), (c) and 4).

Point 1 refers to “freestanding installations.” Please be precise – does this mean, for example, solar facilities, wind turbines, anaerobic digesters?

As noted, point 1 should clarify what is meant by an “appropriate” location, and include reference, for example, to BMV land, heritage, and landscape.

Point 2: Why is there no obligation for all developments to install solar panels on all new buildings? We note that there is only one mention of rooftop solar photovoltaic power generation for domestic or business use in the entire Local Plan. Climate change, the need to reduce our carbon emissions, is existential and yet developers appear to still be given too much leeway.

Point 3: relating to utility scale development for renewable and low-carbon energy and infrastructure primarily for export to the national grid:

Points (b) we wholeheartedly support the stipulation that these projects should be prepared with the involvement of the local community and point (d) likewise.

Point 3(c) regarding “environmental co-benefits such as biodiversity improvements or other ecosystem enhancements.” These concepts must be challenged as they are misleading.

Please note: the “freestanding installations” referred to in point 1 are industrial interventions in the landscape.

Australia, for example, refers to **solar facilities or installations rather than “parks” or “farms” as they are not agricultural projects.** Put another way, it is not because these installations are intended to supply “green” or “renewable energy” that they are beneficial to biodiversity or the environment more generally.

There is, in fact, a growing realisation that it is time for the PR myths perpetuated by the self-interest of renewable energy companies to be challenged. For example, farmers mock images of sheep under solar panels – grass under panels is “rank”, unfit for healthy stock. Another case: Farmers and biodiversity experts at the Kent Wildlife Trust take serious issue with the concept that land will benefit from “rest” (is this referring to the concept of the “fallow” field in medieval farming?) and that following the end of a solar project, for example, that land can automatically revert to food production. It categorically cannot. Healthy soil needs sun and care to ensure rich biodiversity. In addition, construction of these solar facilities disturbs biodiversity.

Point 3 (e): Who will be here to monitor given these end-of-life restoration plans given these “green” energy projects can last anywhere from 20 to 40 years?? How can this clause be seriously monitored??

Point 5 (d): Provide a management scheme which details the future ownership, management and maintenance of the site.

This is essential and should apply to solar, wind and all other renewable energy projects which are industrial installations. Who owns or controls the land?

Our comment is based on local experience and vindicated by related discussion Parliament this year. In 2021, HPC discovered that the company consulting with the parish regarding a potential 250 acre

(101 hectares) solar installation over Grades 2 and 3a farmland in the parish, Enso Energy, would develop the site; however, after 5 years it could sell the lease to the solar installation to any interested business. Enso Energy is a company funded by Macquarie financial services group which holds a majority stake in Greensands Holdings Limited (GSH) which owns Southern Water. In other words, Hoath's local solar installation could be owned by foreign investment interests at arm's length from the parish and the people immediately affected.

Policies related to DS25

We also note that R19, 1 (b) and 2, are not stringent enough regarding oversight of agricultural development as it might relate to development of the rural economy (DS12).

R19, 1 (b) could also relate to permitted development rights for agricultural businesses. Experience has shown that permitted development must be carefully assessed for potential impact on the local area and community such as resulting in increased traffic, damage to roads, houses and noise. We therefore **urge** detailed definition of the agricultural or forestry purposes in question.

The case involving permitted development rights and retrospective planning **CA/21/02265** illustrates how Hoath parish has suffered the consequences of a landowner exploiting the relative flexibility of 2017 policies EMP 12 (Agricultural Land) and 13 (New Agricultural Buildings) to pursue a biomass business (crops grown in Hoath Parish) intended for the anaerobic digester based in North Thanet, itself an element of an expanding agricultural renewable energy business extending across 25 farms from Whitstable to Sandwich.

Based on our experience of the impact of this application and its related activities we urge forensic scrutiny not only of the intent of any renewable energy project but all associated activity and impact on the local community, infrastructure, environment and landscape. Currently CA/21/02265 is in Judicial Review.

RE DS12 (Rural economy), point 1: what agri-environmental schemes are referred to here? Are crops used for biomass production included?

Fortunately, point 3 states the "council will seek to protect the best and most versatile agricultural land for the longer term." A more determined statement would, however, be preferable in light of national discussion related to the nation's food security: "**The council will protect the best and most versatile agricultural land!**"

For clarity, HPC **recommends incorporating the precision of Policy DBE2 (Renewable energy)** from the 2017 Local Plan into the 2040 Local Plan.

For reference – LP 2017 DBE2

Integrating elements of **2017 Local Plan Policy CC1** (Renewable and Low Carbon Energy Production Development [apart from wind energy development]) and **Policy DBE2 Renewable Energy**, which lists specific criteria and considerations which, if used rigorously to assess the potential impact of a renewable energy project, would mitigate "unintended" consequences.

(2017 Local Plan) Policy DBE2 Renewable Energy In determining applications for the development of renewable or micro-generation equipment (apart from wind energy development), the City Council will expect applicants to:

- a. Avoid any significant adverse impacts (visual, noise and amenity impacts);
- b. Have given weight to the environmental, social and economic benefits;
- c. Have minimised the visual impacts by providing the optimum layout and design of the development including screening;

- d. Ensure that the development will not have a significant adverse effect on the amenity of local residents;
- e. Ensure that the installation would not have an adverse cumulative impact on the environment;
- f. Show there is no adverse impact on heritage assets (Policy HE1);
- g. Demonstrate that there is no significant impact on the landscape setting, habitats, biodiversity, wildlife or designations such as the AONB, AHLV, Ramsar, SACs or SPAs;
- h. Ensure protection of the best and most versatile agricultural land unless it is demonstrated that it is necessary and no alternative poor quality land is available. It should be noted that wind energy development will be assessed in accordance with the Written Ministerial Statement (HCWS42) and the briefing paper Planning for Onshore Wind (House of Commons, June 2015) until sites can be allocated and relevant policies developed in either a review of the Local Plan or a specific Development Plan Document.

Had Planning applied the criteria of 2017's Policies CC1 and DBE2, Hoath Parish would have been spared:

- Loss of hedgerows resulting in a degraded hedgerow network (Plan 9: Hedgerow Areas – Landscape Character Assessment)
- Loss of wildlife and wildflower verges
- The impact on road surfaces and verges of 906 journeys over a period of two months undertaken by tankers and agricultural equipment out of scale with local single lane rural roads, transporting digestate to and from SNCF through the Parish and the village of Hoath to a field on Marley Lane
- The impact of large-scale agricultural equipment subsequently travelling on the same roads to the digestate pit on Marley Lane to collect digestate to spread on the fields, apparently those of Church Farm in the Parish, although it has been ascertained that this digestate is also being transported to other areas
- The impact on Parish heritage buildings of the weight and frequency of these transportation journeys
- The hazard of such equipment to daily users of the same roads
- Loss of visual amenity
- A blocked drainage channel (due to dumping of soil related to the pit enlargement) leading down to the Nethergong-Sarre Penn (noted in the **The Draft Nutrient Mitigation Strategy** and discussion of **the Stour Valley River Catchment** (Figure 1, marked in yellow, the Stour Marshes) in the Nethergong Valley.
- Threats to equestrians, cyclists, hikers and others making the most of the Open/Green space the Parish offers
- Vehicle noise and pollution

And would have been

- Assured protection of BMV land; and
- Assured that that project **CA/21/02265** demonstrated no significant impact on the landscape setting habitats, biodiversity, wildlife or designations.

Climate Change Topic Papers

HPC considers the 2022 Climate change Topic Paper should be removed from the evidence material supporting the 2040 Local Plan. HPC considers that the 2022 document does not reflect current thinking regarding climate change, biodiversity, wildlife, landscape and wetland considerations reflected in the 2040 draft plan.

The 2024 Climate Topic Paper also refers to projects contained within the 2022 Topic Paper including **SLAA280, Marley Lane Solar Farm between Hoath and Chislet (Table 6.3.1)** thereby implying this large-scale project is viable (250 acres/101 hectares). This presentation ignores latest thinking and concerns regarding solar **installations** (please refer to comments above), that Hoath Parish Council, and its neighbour, Chislet Parish Council, presented strong objections to this project in 2021 for the following reasons: impact on local communities (proximity to homes of panels and battery storage), the local environment (including wetland and wildlife), rural economy, best and most versatile agricultural land (DS12, point 3), roads, local wildlife, landscapes and biodiversity (refer to relevant policies in the 2040 Local Plan).

Policy R18 – Land at Church Farm, concept masterplan

HPC is considering R18 in the context of the Parish's Neighbourhood Plan. Significant criteria are the impact on local infrastructure (SS5, SS2, DS6, DS26), access to the village of Hoath (SS4, transportation DS14 and highways DS15) community needs (SS3, DS6) and the environment (net zero, biodiversity, SS1, DS17 to 25).

HPC is encouraging residents to comment on the draft Local Plan consultation at PC meetings, in the Parish magazine and newsletter, via community Whatsapp groups, on the Parish Facebook site and at face-to-face conversation at community events. A copy of R18 has been included or shown for discussion in each case.

We have encouraged residents to reflect on the housing offer, traffic, transportation and movement in Hoath Parish as a whole, access to the development, the impact on the rural landscape, heritage – the impact on the Parish conservation areas (Hoath, Rushbourne and Tile Lodge; Ford, Maypole and Old Tree), Wildlife, biodiversity, drainage and wetland, and the impact of renewable energy proposals, farming for biomass projects versus food production.

We appreciate that CCC has reviewed the 2020 Rural Settlement Study and that identifying the village of Hoath as a Local Service Centre reflects the intent of the NPPF (December 2023) relating to Rural Housing (Ch 5, para 83) "to promote sustainable development in rural areas" and to "enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby."

We note that the Development Topic Paper 2040 provides some nuance when it defines Hoath as "*a Local Service Centre with a limited range of services and facilities for residents but considered to be relatively sustainable in the wider context of the district and is suitable for a limited scale of growth that supports its function. Site SLAA202 (R18) has been selected for allocation to support the vitality of the settlement and its ongoing function as a Local Service Centre.*

4.135 SLAA202(R18) was the only site assessed in the SLAA that was found to be suitable, available and achievable in Hoath. It is therefore proposed for allocation and will also provide an opportunity for the provision of local shopping and community facilities.

For this project to succeed, for the village of Hoath to play the role of Local Service Centre, and fulfil the aspirations of the LP (SS1, SS2, SS3, SS4, SS5), the **number one demand of residents and communities is that public transport should be guaranteed.**

WE NOTE THAT SS4, point 4 states: The council will continue to work with partners to improve public transport connectivity in the rural areas and to maximise opportunities to improve walking and cycling routes to connect rural settlements with each other and to the urban areas within the district.

The village benefits from a Parish Hall, a church, a primary school, and, currently, a preschool which rents the Hall for a significant period during the work week, however there are no other services. Residents on basic pensions and without cars and, frequently, digitally excluded, are dependent on the availability and generosity of neighbours and family to carry out basic personal care and administration. This situation isolates them from the district outside and impacts mental wellbeing and overall health. This situation is fundamentally unacceptable!!

R18 – masterplan

We note that Hoath is described as “a small village” with a “good range of services.” Based on the preceding, we consider this is misleading.

Map

- **Opportunities to improve cycling/walking access and safety:** Beyond the drive up from School Lane (the line of the arrow) there is no further opportunity to improve cycling lanes. The roads are too narrow to incorporate a dedicated cycle lane.

1. Development Mix

Using the housing the table DS2 (housing mix), we calculate that it is proposed there be

One 1 bedroom house; Four 2 bedroom houses; Seven 3 bedroom houses; Five 4+ bedroom houses.

It appears that of the 17 proposed houses, five would be affordable housing, four would be first time homes, one would fall into another affordable home category.

It is essential that housing is affordable to local residents, first time buyers and residents who are downsizing. Affordable must be within the means of locals!

Parking: Using the information in Appendix 3, Parking Standards, Table 1, residential car parking standards, there would be a total of 34 cars not including parking for deliveries, visitors and disabled.

Please note the predictable log jam at the exit of the development into the corner in School Lane where parents park during drop off and pick up times. Residents complain consistently that they cannot exit or enter their drives during these periods.

As there is no public transport, the estimated extra 34 cars will need to enter and leave the village and Parish daily, commuting to work, secondary schools, colleges and universities and more. As discussed earlier, this is in addition to the Primary school traffic and the large-scale farming and construction vehicles which are not suited to the local road infrastructure and causing considerable damage to road surfaces and verges, impacting heritage assets, as well as being a hazard to private cars and residents going about their daily business.

How does this situation reduce the district’s carbon footprint?

2. Design and layout

- HPC **objects** to the use of the Grade 2 farmland designated for development.

DS12, Rural Economy, point 3: HPC supports the council in seeking to protect **Best and Most Versatile (BMV)** land for the longer term.

- HPC **supports** using **Church Farm’s brownfield** site included in the plan – two former grain stores – and adding the four silos opposite them. These silos were discussed during the March 2022 site meeting with the representative of Saint Nicholas Court Farm/the Farm Energy Company/Finn’s real estate as potentially available for development.

This would also be a natural extension of the development of a former Church Farm agricultural building into three residential dwellings under permitted development in 2017:

CA/17/00575/PAMB.

1 (b) (i): Non-residential development proposals

- Re new local shopping and community facilities: Consultation with residents since March 2022, when HPC undertook a site visit with the planning representative of the landowner, rejects this concept based on experience which has shown that the Parish cannot sustain a village shop. Most recently in May 2024, a resident who has lived in Hoath his entire life commented: “Any one running a shop must be able to make a living. That has never been the case which is why there is no longer a village shop.”

The pandemic has encouraged online shopping and/or residents drive to Canterbury and Herne Bay for weekly groceries. There are regular deliveries from ASDA and Sainsbury’s for example.

Hoath’s Neighbourhood Plan is exploring the potential for Hoath Parish Hall and the pub at Maypole to provide facilities for residents to buy daily basics (e.g., coffee, tea, eggs, bread, newspapers).

Residents have also suggested a multiuse/purpose building instead of a dedicated shop which could, for example, enable weekly health clinics with a district nurse. As there is no health service in the parish, the closest surgeries are in Sturry and Broomfield. Residents depend on travel by car. Once again, the impact of the lack of public transport on residents is clear.

- Residents **reject** further parking for a possible public service such as a potential shop or Hoath Primary School as the Parish has sufficient parking and does not want an additional expanse of asphalt transformed into “a frying pan” in the context of Climate Change 40-degree heat in summer, and without a water capture strategy in the context of intense rain bursts with water standing on the area’s clay.
- Residents currently **reject** EV charging infrastructure as the source for the electricity provision is unclear, increasing charging costs to homeowners, cost of electric vehicles, lengthy charging times and insufficient battery distance given all key daily tasks must be carried out by private cars travelling outside the Parish, and, given technological developments, the long-term viability of electric cars.

1 (b) (ii) HPC objects strongly to what appears to indicate contributions will be for off-site community infrastructure and proportionate land and build contributions to schools and education off-site as defined **by Policy SS5 – Infrastructure strategy for the district.**

Comment: Hoath needs **tangible community benefits** as a quid pro quo for any development. As already indicated in HPC’s earlier comments regarding Hoath’s designation, it will take time to build

sustainability and Hoath parish will need resources, including finance, to achieve this. The Neighbourhood Plan will be the mechanism for developing a concept for the parish's sustainability.

Rather than building a shop with an uncertain future and possible more public parking spaces, **community benefit** for Hoath would be, for example, the landowner **giving the Parish the Grade 2 land** he proposes to build on so that this could become additional community green space and support CCC's biodiversity initiative, part of the 2022 Marley Lane development in the village as per **Policy SS1 – Environmental strategy for the district, point 2** (the network of green and blue infrastructure and corridors between habitats and ecological connectivity) and SS1, points 4, 5, 6, 7,8.

1 (c) Open space and DS24 GREEN GAP between Maypole and Hoath

The Natural Environment and Open Space Topic Paper 2024 discussed the Green Gap between Maypole and Hoath. The document states that the area between R18 and Maypole in the Ford, Maypole and Old Tree conservation area could present "opportunities for enhancement" and the outcome states that "based on this technical assessment, it would be considered a potential **strong green gap**." However, counterintuitively, on account of the settlement hierarchy – Maypole being a village and Hoath a Local Service Centre – this site is considered unsuitable against this metric.

We are surprised by this decision given the emphasis on maintaining separation and character of settlements (R19, point 5) and the inherent contradiction. We would therefore like for this decision to be reconsidered. **Or is this what is described in 3, point (d)?**

2(b) and (d) Protect and enhance nearby heritage assets including Hoath Rushbourne and the Tile Lodge conservation area. To this should be added, the Ford, Maypole and Old Tree conservation area as this is directly opposite (a field away) from R18.

Please refer to **DS26 Historic environment and archaeology, Point 5**.

3. Landscape and green infrastructure

Drainage

R18 does not refer to **The Draft Nutrient Mitigation Strategy** and discussion of **the Stour Valley River Catchment** and potential adverse impacts on the Stodmarsh Complex.

HPC is **concerned** by this omission given recent history as outlined in the Strategy's Executive Summary and that the Strategy notes in Appendix A, that R18 will drain into the Nethergong valley wetland, part of the Sarre Penn, which is in the parish.

"In the Stour Valley River catchment in East Kent, developments could adversely affect the Stodmarsh complex, which is designated a Site of Special Scientific Interest, Special Protection Area, Special Area of Conservation and Ramsar site. Several of the nature reserve lakes at Stodmarsh are in a state of eutrophication (an unfavourable conservation status) and it has been found that the nutrients of highest significance in terms of water quality in Stodmarsh are nitrogen and phosphorus."

- **Para 2.12: Figure 1: Nutrient Neutrality Context:** This map covers the entire Stour Valley Catchment area. Hoath Parish includes the Sarre-Penn/Nethergong inlet/Wantsum Channel, part of the Stour Valley Catchment area (Figure 1, marked in yellow, the Stour Marshes).
- **Para 2.14:** Defines the watercourses that discharge into Stodmarsh belonging to the Stour Management Catchment.

Appendix A in the draft Nutrient Mitigation Strategy records that **R18, recorded as SLAA202 Land at Church Farm, Hoath, will drain** into the Sarre Penn and Wantsum. In so doing, drainage will pass through Hoath Parishes Nethergong Valley wetland (part of the Sarre Penn), through the Chislet Marshes into the Wantsum Channel.

Please note: The entry for **SLAA202 Land at Church Farm, Hoath, notes:** existing land use -- cereals; proposed land use -- residential urban; soil scape drainage -- freely draining, Sarre Penn and Wantsum.

Please note: The Land use description will be addressed below. The **land R18** proposes using for residential properties is Grade 2 farmland producing cereals; this contradicts the aim of **Policy DS12 – Rural Economy, Point 3** which aims to protect BMV land.

Please note: The 2020 Canterbury Landscape Character Assessment and Biodiversity Appraisal, **Figure 3.7, identifies the Nethergong Valley/Lower Stour Wetlands as a Biodiversity Opportunity Area** which, in turn, supports **Policy SS1, Point 3** and **DS21**.

When **R18** is considered in the context of the preceding, **Policy SS1 – Environmental strategy for the district**, Points 2,3,4,8 and **DM16 Water Pollution and nitrates**:

1. What mitigation has been planned for R18 drainage to avoid nutrient problems in the Sarre Penn and Wantsum/Stour River Catchment area?
2. What consideration has been given to fostering the Biodiversity Opportunity of this area?
3. What planning is taking place to restore the parish's wetlands (the Nethergong) as discussed in the Natural Environment and Open Space Topic Paper, Chapter 8?

In addition,

- HPC **objects** to any further construction of executive homes in the Parish following completion in 2022 of the Marley Fields development in Hoath village in the interest of ensuring social and economic diversity in the Parish.
- HPC **supports** housing which is affordable for young couples to remain in the area and older couples downsizing. Housing in the Parish should be built to **Passivhaus standards**. This will be further defined in Hoath's Neighbourhood Plan.
- **HPC supports DM 16 – Water Pollution, Point 5, especially in relation to R18:** "Agricultural development or changes in land use will also need to demonstrate how they are taking account of, and minimising, any harm to nitrate vulnerable zones." This is significant regarding the Nethergong-Sarre Penn area of the Parish and the drainage from this site towards this area as indicated above.
- **Hoath is built on clay, and in winter has standing water.** In addition, the drainage system is at capacity with regular overflows. And, in response to the increased runoff resulting from climate change rain bursts opposes any increase in cemented surfaces such as car parks.

HPC therefore **stresses the significance of Policy DM14 – Flood risk, Point 1 (e)** ensuring any development pays attention that "surface water runoff is managed effectively and robustly , in line with Policy DM15 (sustainable drainage), giving priority to the use of SUDS, and discharge locations have capacity to receive all foul and surface water flows from the development."

In this context, **HPC also stresses** the equal significance of **Policy DM15 – Sustainable drainage**, especially **Point 1, (h)**.

4. Access and transportation

- There is no public transport service to Hoath
- There is no space for dedicated cycle routes or pavements as the lanes leaving the village and traversing the parish are rural, many lined by hedgerows, and
- 17 new properties and associated transportation are unsustainable without public transport and road connections which do not further stress the roads in the Parish.

5. Phasing and delivery

HPC agrees with these timings.

6. To be included in any development in Hoath Parish

In addition to the considerations and policies mentioned so far, HPC considers the following policies/issues are currently missing from R18 and should be included in any development in the Parish:

- **HPC supports SS2 – Sustainable design strategy for the district, Point 5** New development should ensure the delivery of the highest quality digital infrastructure, including Fibre to the Premises (FTTP) broadband and support the highest possible standards of mobile data networks in line with **Policy DS6**
- HPC supports building to **Passivhaus standards** in the interest of adapting to the demands of climate change
- **Water consumption:** HPC supports **Policy DS6, Point 5** regarding maximising water efficiency in new residential development.
- **Heating:** there is no mains gas in Hoath. How will new homes be heated in keeping with the green ambitions of the Local Plan?
HPC supports **DS25 Point 2** suggesting rooftop solar photovoltaic power generation. Houses should ideally have south-facing roofs in order to maximise exposure.
- **HPC supports DM18 Light Pollution and dark skies**
Hoath currently benefits from NO light pollution and HPC aims to conserve this; 17 new homes could impact this. (The 2020 Canterbury Landscape Character Assessment and Biodiversity Appraisal, Figure 3.10 Levels of Dark Skies and Light Pollution supports this.)
- **HPC supports DM17 Noise, odour and dust pollution**, especially Points 1,3, 5 and 7.
- **HPC supports DS26 Historic environment and archaeology**, especially in light of the significant heritage sites and buildings in the Parish evidenced by its two Conservation Areas.

Housing Quotas

HPC questions the numbers of new homes that are estimated to be built under the 2040 plan. We believe the numbers do not reflect the latest demographic trend as recorded in Census 2021 or local need as local sources indicate there has been minimal local fluctuation since 2014.

However, it is well documented that London boroughs are buying in the district to house some of their residents and are effectively creating dormer districts for commuters to London. Developments are unimaginative, almost mirroring each other, with only token acknowledgement of local design; they are rather closer in character to Lego houses. Many question, for example, how effective the

two or three solar panels on rooves in the Hillborough development actually are. Infrastructure development is not undertaken as required and the houses are not well built. And yet prices are high, out of reach of many in the district as they do not reflect local incomes.

In addition, Defra describes East Kent <https://environment.gov.uk/catchment-planning/v/c3-plan/ManagementCatchment/3087> as “one of the driest parts of the country. Groundwater supplies 80% of the areas drinking water and also provides important base-flow to the river systems.” On an international scale, East Kent is just below Morocco.

Lack of water, straining, if not ruining, our natural resources such as the Blean, Stour Catchment, orchards and fine farmland and yet central government requires us to build more houses, concrete more natural surfaces, remove trees to make way for Lego developments.

HPC urges CCC to claim Exceptional Status for Canterbury District with its internationally acknowledged heritage and landscape sites. This over-crowding and depletion of resources have to stop.

Transportation and Highways

HPC supports all policies aimed at improving connectivity between the rural and urban areas of the district including policies SS4 (Movement and transportation), DS14 (Active and sustainable travel) and DS15 (Highways and parking).

HPC **supports** the aspirations of SS4, point 4: “The council will continue to work with partners to improve public transport connectivity in the rural areas and to maximise opportunities to improve walking and cycling routes to connect rural settlements with each other and to the urban areas within the district.”

The termination of the Bus 7 route makes implementing Policy SS4, Point 4 a priority for Hoath Parish. How the significant impact of losing public transport connection to the district’s urban centres is resolved will decide the sustainability of Hoath Parish.

Without Stagecoach Bus 7, residents without cars and on low incomes are cut off from urban services (banking, health services, employment, theatre, pubs etc) and regular socialisation with friends and family in Canterbury, Herne Bay, Whitstable, and centres such as Sturry and Herne and Broomfield. They depend on the goodwill of neighbours, family if nearby, or taxis if they can afford them, to administer their daily lives. School children are in the same situation.

This dependence on cars is counterproductive in the context of all the efforts to improve our environment and biodiversity.

Reintroducing a bus service to Hoath:

The increasing number of residents in the Hillborough development in Herne Bay is impacting use of Maypole-Hoath road linking the A299 to Sturry and connecting bus routes. With this in mind, we suggest working with partners to re-establish public transport between Hillborough and Sturry with a stop in Hoath in order to

- Alleviate traffic on the link road between Hillborough and Sturry
- Connect Hoath with key urban areas (Hillborough/Herne Bay and Sturry/Canterbury)

- Support community resilience in Hoath
- Improve road safety in Hoath Parish for residents, equestrians, cyclists and pedestrians
- Support CCC policies and local efforts to improve the environment.

Collaboration between CCC, KCC and parishes

We urge CCC to strengthen collaboration between KCC Highways and parishes so all three parties – CCC, KCC and parishes – can work together to establish effective use of rural roads by today's agricultural and passenger vehicles which are generally too heavy and large for the scale of the rural road network.

HPC **supports** the aspirations of **DS14, Point 1** so that at least within the Parish there can be safe, high quality connectivity favouring cyclists, pedestrians, equestrians, users of Bridleways and Public Rights of Way.

Applying the principles of Vision and Validate (para 1.57) will ensure sustainable transport modes include rural areas which will benefit all age groups from pensioners to school children.

Please note: There are no pavements or cycle lanes in the Parish as there is room for neither given hedgerows line the rural roads.

Conclusion

Drawing on **SS4, DS14, Point 1** and **DS15, Point 3**, and in addition to reinstating public transport, **HPC requests urgency in initiating the following highway and speed actions in order to mitigate the impact on the Parish** of school traffic, large-scale agricultural and construction vehicles, and increasing traffic from the Hillborough development, using the road linking the A299 exit onto Heart-in-Hand road through Hoath Parish to the A28 at Sturry and vice versa:

- Reinstating regular daily Public Transport from Hoath Village and Maypole to Canterbury and Herne Bay
- Impose size and weight restrictions on agricultural and construction vehicles using the roads crossing the Parish and the road linking the A299 and A28 so that they no longer present a danger to residents and road traffic, and damage to roads and verges is diminished
- The speed limits on the road linking the A299 and A28 (Heart-in-Hand Road, Hoath Road, Maypole Road to Sturry) must be reduced to 40 mph
- Current 30mph stretches through Maypole and Hoath village must be reduced to 20mph
- The centre of Hoath village, especially the area around the Primary School, must be reduced to 15 mph.