

**Draft Canterbury District Local Plan to 2045
(Regulation 18) Consultation 2023**

**Response from Hoath Parish Council
16 January 2023**

Hoath Parish Council with its five councillors is the first tier of local government in our area and as such represents the 551 Parish residents (2021 census).

The Parish lies between Hersden, Herne and Broomfield, the Wantsum Channel and East Blean Wood, and has six settlements: the village of Hoath, Maypole, Knaves Ash, Ford, Oldtree, Shelvingford, Stoney Acre and the small segment of Boyden Gate with the Gate Inn pub.

The Parish is rural with varied landscapes covered by four designations in the Canterbury Landscape Character Assessment and Biodiversity Appraisal (October 2020): H2 Hoath Farmlands; B2 Nethergong-Sarre Penn Inlet (the Parishes wetlands); C4 Ford and Maypole Mixed Farmlands; D4 East Blean.

Residents love where they live and want to conserve and, where necessary, restore the historic and rural character of the Parish for future generations, while also adapting to the times.

Hoath has gradually become squeezed by developments in Hersden and Sturry on one side, and Herne and Broomfield on the other, all losing green space and open landscape in the process. Covid focussed attention on what Hoath can give the district: “a rich environment and valued landscapes, creating a network of spaces, supporting wildlife and biodiversity.” With fields and woodland intersected by Public Rights of Way and open-air pleasures like riding and hiking, the Parish has much to contribute to “improving the health and wellbeing of our communities.”

Launching our Neighbourhood Plan will bring the community together to define its vision of Hoath’s future.

Working through the draft Local Plan to 2045 has been a great way to start that process.

Imogen Morizet
Chair
Hoath Parish Council

16 January 2023

A. Designation of Hoath village as a Local Service Centre and the impact of no public transport

Introduction

Our sincere apologies that despite CCC's request to Hoath Parish Council (HPC) in 2021 for feedback regarding the October 2020 Rural Settlement Study, together with the attached Appendix 1 Rural Settlement Services and Facilities, the current Parish Council has only been aware of the Study and its results since the release of the 2045 Draft Local Plan in October 2022.

The economic impact of the Covid pandemic on the Parish is now clear and the following response to the draft Local Plan reflects this.

In 2023, the designation of Hoath village as a local service centre is expecting the Parish, and the village of Hoath, to jump before it can walk. The data informing the 2020 Rural Settlement Study is based on information gathered primarily before the pandemic and is therefore out-of-date.

Since June 2022, the Parish of Hoath, including the village of Hoath, has **no public transport**. Private cars now connect the area and its residents with urban and service centres. Achieving net zero is a vanishing goal.

In short, losing public transport is effectively undercutting Local Plan policies aimed at improving the sustainability of the Parish, including the wellbeing of its residents and its environment. Hoath Parish, and the village of Hoath, at least for now, do not align with the concept of a local service centre.

1. Policy SS3 Development Strategy for the district and Policy R21-- Local Service Centres

Hoath Parish Council (HPC) **objects** to the designation of the village of Hoath as a Local Service Centre within the **SS3 development strategy for the district** and within **Policy R21-- Local Service Centres**.

HPC considers Hoath village **should remain designated a village** as in the October 2011 Rural Settlement Hierarchy Study of Canterbury District, and that **Policy SS3, Point 7** should apply as this definition would be sustainable for the Parish:

“Within the countryside which is defined as any parts of the district outside of the settlement boundaries of the urban areas, rural service centres and local service centres, priority will be given to protecting the rural character of the district. In this context, new housing development will only be supported in very limited circumstances and new community facilities, business space and tourism facilities will only be supported where the need for the development outweighs any harm existing community facilities and services within the countryside will be protected.”

Reasons HPC objects to the proposed designation

The conclusions of the **2020 Rural Settlement Study** (research undertaken in 2019 and 2020) and Appendix 1 are out of date. They do not factor in the impact of the Covid pandemic and lockdowns (2020, 2021) on the economy, locally and nationally, and its further impact **on service and facility provision** for Hoath village.

As a result, having reviewed the methodology used by the 2020 Study, and its conclusions, including Appendix 1 (Services and Facilities analysed below), HPC believes that in **2023**, Hoath village **does not meet the requirements of a Local Service Centre** and will not do so for some years, **despite the aspirations of Policy SS3, Point 6 and R27.**

Re HPC's position on new housing, please refer to discussion of **Policy R27** below. We will also cross reference with **Policies DS25, DS12, DS14 and DS15.**

HPC's objections to Appendix 1 of the 2020 Rural Settlement Study

- Mischaracterisation as a Pre School/Nursery (3) points of the Chislet and District Pre School Playgroup (a charity) and its relationship with Hoath Parish Hall (a charity)

The Chislet and District Pre School Playgroup is a charity, a play group, and **not a statutory pre-school/permanent service** to Hoath village, unlike Hoath Primary School.

In addition, the governing document of the Village Hall makes clear that the Hall is for and governed by the people of Hoath and the Hall's users. The Playgroup is only one of the groups using the Hall. The Playgroup pays an hourly rate to hire the space as do other groups and residents using it. Hours can be reduced at any time, and the relationship with the Village Hall can also be terminated at any time. Its relationship with the Hall is therefore not permanent. Hoath residents are currently keen to reduce the Playgroup's daytime access to the Hall in order to resume pre-pandemic activities.

Hoath Primary School has confirmed it has no plans for a Pre School/ Nursery.

Appendix 1 Note re Scoring and Ranking summary

HPC **objects** to the 2020 Scoring and Ranking Summary in Appendix 1 noting Hoath has three (3) Key services as, in line with the preceding note, this gives a misleading impression as to the services offered to residents and outsiders.

With the Pre School/Nursery designation removed, the remaining "important services" used by the residents of Hoath Parish are Holy Cross Church, 1; Hoath Parish Hall, 3.

Hoath Primary School,3, is primarily a service for families outside the Parish. It is of no economic benefit to the Parish. **Please note** comments below regarding the impact of school-related transportation to and from Hoath.

Conclusion: As the Playgroup is not a statutory service defining the village of Hoath, and is dependent on the goodwill of Hoath residents, Pre School/Nursery should be removed from Appendix 1 of the 2020 Rural Settlement Study.

The **Services and Facilities score** for Hoath should **be reduced to 7** in line with other villages in the 2020 Hierarchy.

Designation of Maypole

HPC **objects** to the categorization of Maypole as a village.

The October 2011 Rural Settlement Hierarchy links Maypole to Hoath: Hoath *including Maypole*. Signage entering Hoath confirms this. The 2020 Rural settlement hierarchy now classifies Maypole as a village with a pub its unique facility.

Historically, villages were defined by having a church. Holy Cross in the village of Hoath is the only church in the Parish.

HPC therefore considers Maypole should continue to be considered **as a hamlet**.

2. Policy SS4, Movement and transportation strategy for the district, Policy DS14 – Active and sustainable travel, Policy DS15 – Highways and Parking

- HPC **supports** Policy SS4. The termination of the Bus 7 route makes implementing **Policy SS4, Point 4** a **fundamental priority** for Hoath Parish.

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.”

How the significant impact of losing public transport connection to the district’s urban centres is resolved will decide the future of Hoath Parish.

HPC **supports SS4, Points 5 and 6** and urges that they be applied to rural areas in addition to new neighbourhoods:

- **Point 5:** “. . . public spaces, streets and movement networks provided through new developments should be accessible for all ages and levels of mobility and promote healthy lifestyles. Walking, cycling, and active low carbon sustainable transport modes (such a public transport stops) should be prioritised in line with Policy DS13 (Movement Hierarchy), over private cars with traffic speeds limited within new neighbourhoods.” And
- **Point 6** with its focus on improving air quality and reducing air pollution and exposure in line with Policy DS16 (Air quality).

- HPC **supports** the aspirations of **DS14, Point 1** and urges action **to reinstate public transport and introduce restrictions on vehicle speed and scale and weight of construction and large-scale agricultural vehicles** 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.

Background context and impact of termination of Public Transport (Stagecoach Bus 7) in June 2022 on the village of Hoath, the Parish, residents and evidence

In June 2022, Stagecoach cancelled Bus 7 serving Canterbury – Sturry --Hoath/Maypole - Broomfield – Herne Bay. This service had been uninterrupted since the 1940s.

This termination of public transport lies at the heart of why HPC **objects** to the classification of the village of Hoath as a local service centre. The loss of Bus 7 impacts all settlements in the Parish of Hoath: Hoath village, Maypole, Knaves Ash, Ford, Old Tree, Shelvingford, Stoney Acre, part of Boyden Gate (The Gate Inn).

This situation is having a negative impact on the wellbeing of residents. Without Stagecoach Bus 7, residents without cars 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.

Private cars are now the unique source of transportation for residents and those of parents delivering and collecting their children from Hoath Primary School and the playgroup. Parish roads are already significantly damaged by large-scale farm and construction vehicles not adapted to the scale of local roads and local infrastructure, and they are also impacting heritage sites. The impact on the local environment (pollution, noise, carbon footprint), road safety, wear and tear on road surfaces and verges, inhibiting enjoyment of local pursuits (riders, cyclists, hikers) and local businesses such as liveries, is evident.

Bicycles on the Parishes narrow lanes are not a safe or practical alternative, neither is walking, both activities competing with the large-scale farm equipment and construction vehicles, and drivers cutting through the Parish from the A299 (Hillborough, Heart-in-Hand road) to the A28 (Sturry), consumed by the busyness of daily life.

Stagecoach stated the Bus 7 cancellation was due to financial constraints resulting from the pandemic and lack of use, despite evidence to the contrary. Our CCC and KCC councillors pointed out that the Parishes schoolchildren would be entirely dependent on parental capacity to drive them to, and collect them from, schools in Canterbury or Herne Bay, in addition to the impact on residents, especially those without cars, noted above.

Stagecoach has nonetheless refused to reinstitute the service, even a reduced one, and stated categorically that this will not happen at any point in the future.

Please note:

- Hoath Primary School, and users of the Playgroup, mainly serve families coming from outside the Parish. They arrive and leave by car.
- **Services/facilities** related to Hoath have **regressed since 2011**: the 2011 Rural Settlement Hierarchy notes 5 buses a day, Hoath to Canterbury; 6 buses a day, Hoath to Herne Bay.

Analysis of the 2020 Understanding relationships between the rural settlements in the Settlement Hierarchy and the impact of lack of public transport

The Rural Settlement methodology lists the following as data used in assessing these relationships: school catchment data, GP catchment areas and travel time data for access to other key services -- 15 minutes walking, 10 minutes cycling, 30 minutes public transport, and 5-10 minutes by car to identify settlements which function together as a group or cluster.

- i. Transportation to and from Hoath's Primary School and the Playgroup is uniquely in family cars. There is an influx of speeding between 8.00 to 9.00 am and 3.00 to 4.00pm.
- ii. **Alternative buses to Bus 7, using Google Maps**
Stagecoach Bus 6, Canterbury to Herne Bay: The nearest Bus 6 stop to Hoath lies on Canterbury Road at the entrance to Wildwood. Hicks Forstal Road is the unlit single car rural lane travelling through East Blean Woods connecting Hoath with Wildwood. **Distance**: 2.2 miles; car: 6 mins; on foot: 44 minutes, bicycle, 13 minutes.

Stagecoach Bus 8, Canterbury to Margate: Bus 8 stops on the A28 in Rural service centres, Sturry and Hersden, and village, Upstreet. Each stop is roughly 2 miles away from Hoath Parish Hall; car, 7 minutes; on foot, 44 minutes; bicycle 12 minutes.
- iii. **Examples of health visits to Sturry and Herne and Broomfield:**

Hoath Parish Hall to Sturry Surgery located on the A28: **Distance**: 3 miles; by car, 7 mins during light traffic; on foot, 59 minutes; on bicycle, 17 minutes.

Hoath Parish Hall to Herne and Broomfield Surgery: **Distance**: 2.7 miles; by car, 7 minutes; on foot, 43 minutes and by bicycle, 12 minutes.

Please note: There are no pavements or cycle lanes in the Parish; there is room for neither as hedges line the rural roads leading to and from the preceding destinations.

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 future 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:

- Reinstates regular daily Public Transport from Hoath Village and Maypole to Canterbury and Herne Bay
- Imposes 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.

B. Policy R27 – Land at Church Farm, concept masterplan

HPC **objects** to the development as presented.

This proposal has not been subjected to full scrutiny by residents.

Action: Ensuring the Parishes economic, social and environmental sustainability requires HPC to thoroughly engage with the community. Hoath’s Neighbourhood Plan will incorporate residents’ vision and priorities for the Parish while also reflecting the priorities of the NPPF and draft Local Plan.

a) General context for HPC’s objection

As explained earlier regarding the 2020 Rural Settlement Study, **in 2023**, Hoath village **does not meet the requirements of a Local Service Centre** and will not do so for some years, despite the aspirations of **Policy SS3, Point 6 and R27**.

Also as previously noted, HPC considers Hoath village **should remain designated a village**, and that **Policy SS3, Point 7** should apply as this definition would be sustainable for the Parish:

“Within the countryside which is defined as any parts of the district outside of the settlement boundaries of the urban areas, rural service centres and local service centres, priority will be given to protecting the rural character of the district. In this context, new housing development will only be supported in very limited circumstances and new community facilities, business space and tourism facilities will only be supported where the need for the development outweighs any harm existing community facilities and services within the countryside will be protected.”

- **Policy R28 – Countryside:** HPC **supports Policy SS3 Point 7** as it reflects the character of and future potential for Hoath Parish and its settlements. Hoath Parishes Neighbourhood Plan will expand on future economic development, including tourism, and community and business potential in full consultation with Parish residents.
- **Absence of Public Transport:** please refer to earlier reference to **Policy SS4 Movement and transportation strategy for the district, Points 5 and 6**.
- **Policy DS15 – Highways and Parking** provides possible ways to rationalise the overload of private and large-scale agricultural vehicles on Parish roads. **Point 3:** there is a need for “a transport statement or assessment and a travel plan” from Saint Nicholas Court Farm (North Thanet)/The Farm Energy Company to reduce the impact of the agricultural traffic on the Parishes roads, **(c); Point 4** (Proposals for development will be refused) **(a), (c), (d); Point 6, (b); Point 7 (b)**

- R27 does not refer to **The Draft Nutrient Mitigation Strategy (21160-NUT-RP-02/C01)** 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 R27 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 **R27, 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, 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 R27** 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 **R27** 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:**

- What mitigation has been planned for R27 drainage to avoid nutrient problems in the Sarre Penn and Wantsum/Stour River Catchment area?
- What consideration has been given to fostering the Biodiversity Opportunity of this area?

- What planning is taking place to restore the Parishes wetlands (the Nethergong) as discussed in the Natural Environment and Open Space Topic Paper, Chapter 6?

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** referred to in **SD6 - Sustainable Design, Point 1(a)**. This will be further defined in Hoath's Neighbourhood Plan.

HPC **supports Policy DS6 – Sustainable design**, Points 1, (a), (b), (d); Point 2, (a), (b), (c); Point 3, (c), (d); Point 4; Point 7 and all its sub paragraphs; Point 8.

- HPC **objects** to the project building on Grade 2 farmland and **objects** to the number of approximate dwellings: 17 across circa 0.85h. HPC **supports** development on brownfield sites. Detail below.

b) **Comments and suggestions re R27 by Point by Point**

Map of Hoath

- **Correction needed:** the Hoath Parish Hall indicated on the map is the village car park. The Hall is next to the car park opposite Hoath Primary School.
- **The triangle shown as a Play area** is Parish Council property and no longer a play area due to lack of maintenance. The area will be repurposed in line with discussions related to Hoath's Neighbourhood Plan.
- **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. As mentioned earlier, the roads are too narrow to incorporate a dedicated cycle lane.

R27, 5.43:

- HPC **agrees** Hoath is a village.
- HPC **objects** to the description that Hoath has a "good range of services" as, already discussed in HPC's analysis of the 2020 Rural Settlement Study, it does not.

R27, 5.44: HPC **supports** delivery of a mix of homes to include some affordable housing.

1. Development Mix

- **Point 1 (a)** HPC **objects** to 17 houses as this would introduce an excessive expansion of the village and associated traffic. Since 2000, **22 homes** have been built in the Parish, of these **15 in the village of Hoath** (3 homes on Church Farm under permitted

development; 3 homes behind the Village Hall; 9 homes in the Marley Lane development in 2022). The other 7 have been built in Old Tree and Maypole.

- HPC **objects** to a significant increase of private cars on local infrastructure. Each new home has introduced an average of two cars to the Parish. 17 homes would result in **an estimated extra 34 cars** entering and leaving the village and Parish daily, commuting to work, secondary schools, colleges and universities. 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 are causing considerable damage to road surfaces and verges, impacting heritage assets, as well as being a hazard to private cars. In addition, the exit onto School Lane will be a traffic logjam.

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

- HPC **objects** to the use of the Grade 2 farmland designated for development. **Policy DS12, Rural Economy, Point 3: HPC supports** the council in seeking to protect **Best and Most Versatile (BMV)** land for the longer term.

“The council will seek to protect the best and most versatile agricultural land for the longer term. Any development on agricultural land will need to be supported by an Agricultural Land Classification Assessment. Development on unallocated agricultural land that would result in the significant loss of Grades 1, 2 and 3a agricultural land will only be permitted where it can be demonstrated to be necessary to meet a local housing, business or community need and a suitable site within urban areas and settlement boundaries or on poorer quality land cannot be identified.”

Has an Agricultural Land Classification Assessment been undertaken for R27?

- 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**.

HPC estimates the brownfield site suggested could allow 8 to 10 homes (?) and would be a natural extension of the three residential dwellings in the converted agricultural building. 16 additional cars could possibly be manageable. Public transport would be better.

1 (a) (i) and 1 (a) (ii): HPC agrees with the housing standards suggested, M4(2) and M4(3).

1 (b) (i): HPC objects to the Non-residential development proposals

- a proposal for a “village shop.” 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 one.

The pandemic has encouraged online shopping and/or residents drive to Canterbury and Herne Bay for weekly groceries.

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

- Residents **reject** further parking for Hoath Primary School as the Parish has sufficient parking and does not want an additional expanse of cement 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 this proposal which 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.

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, Hoath must retain a village designation to consolidate itself. The Neighbourhood Plan will be the mechanism for achieving sustainability and incrementally supporting the function of Parishes settlements in-keeping with the character of the Parish.

Rather than building a shop with an uncertain future and more parking spaces, **community benefit** for Hoath would be the landowner **giving the Parish the Grade 2 land** he proposes to build on so that this can become additional community green space and support CCC’s biodiversity initiative which is part of the 2022 Marley Lane development in the village as per **Policy SS1 – Environmental strategy for the district, Point 2** regarding the network of green and blue infrastructure and corridors between habitats and ecological connectivity, **and Points 4 and 6.**

There is, for example, interest in establishing a community orchard and having food growing opportunities as per **Policy SS2 – Sustainable design strategy for the district, Point 7(c) and (d).**

Please note: Prior to the purchase of Church Farm in 2015/16 by Saint Nicholas Court Farm/ The Farm Energy Company, Church Farm was known as an “outstanding high yielding commercial arable farm.” The land ranges from Grade 1 to Grade 3, with the majority Grade 2.

1.(c) HPC supports open space provided in line with **Policy DS24**.

2. Design and Layout

Point 2 (a) and (b): HPC **supports** this in general, however, as noted earlier, the proposed development of 17 houses does not protect the rural character of the area, rather, urbanises it yet without supporting public transportation and infrastructure.

- HPC **agrees** with the following aspiration of **Policy R28 – Countryside**

R28, Point 1: Within the countryside, new housing development will only be supported where it protects the rural character and appearance of the countryside and:

(a) it represents appropriate infill development within the Villages and Hamlets identified in **Policy SS3**

(c) it meets the requirements for the conversion of existing rural buildings as set out in **Policy DS4**.

Point 3. (b) the development protects the rural character of the area, including in terms of any cumulative impacts of similar developments, and any adverse impacts on the landscape and heritage are appropriately mitigated

(c) the development can be accommodated by the local highway network, has appropriate vehicular access is appropriately accessible by public transport and walking and cycling.

Point 5. The council will protect the network of valued open spaces, green infrastructure and sports and recreation opportunities that exist within the countryside and will resist development which affects the openness of designated green gaps which would erode the separation between, or the character or setting of, individual settlements.

The preceding also supports **Policy SS2 – Sustainable design strategy for the district, Point 3 and Point 7(c) and (d)**.

Point 2(c): HPC **objects**, as noted above, to the following: “local shopping and community facilities plus associated car parking adjacent to the access of the site from School Lane.”

HPC **proposes** transfer of the Grade 2 field to the Parish as community benefit to the shop and parking proposed. The land would be used in line with **Policy SS1 – Environmental strategy for the district, Point 2** regarding the network of green and blue infrastructure and corridors between habitats and ecological connectivity **and Policy SS2 – Sustainable design**

strategy for the district, Point 7(c) and (d), establishing a community orchard and having food growing opportunities.

Point 2 (d): HPC **supports** this point however, there must be mitigation of impact on heritage assets in **both Hoath Parish conservation areas:** Hoath, Rushbourne and Tile Lodge **and** the Ford, Maypole and Oldtree (Hoath). The latter is across the field from the proposed site. Please refer to **DS26 Historic environment and archaeology, Point 9**.

Point 3. Landscape and green infrastructure

HPC **agrees** with and **supports** this approach.

Point 4. Access and transportation

HPC **supports** 4 (a).

However, as discussed throughout this report,

- There is no public transport service to Hoath
- There is no space for dedicated cycle routes as the lanes leaving the village are single width, and
- 17 new properties are unsustainable without public transport and road connections which do not further stress the roads in the Parish.

5. Phasing and delivery

HPC **objects** to 5 (a) as outlined above.

As noted earlier, community benefit must be reconsidered in terms of land given to the Parish. This will support its biodiversity and environmental profile which in turn will benefit the residents of the district's urban and service centres.

Put another way, land as community benefit would allow Hoath to provide a Green Gap/Open Space between Hersden Ridge (F3, 2020 Canterbury Landscape Character Assessment and Biodiversity Appraisal) and Herne and Broomfield, in keeping with the **Strategic objectives for the district** -- to "Protect and enhance our rich environment and valued landscapes, creating a network of spaces, supporting wildlife and biodiversity and improving the health and wellbeing of our communities."

6. Omissions in R27 to be included when assessing any development in Hoath Parish

In addition to the considerations and policies mentioned so far, HPC considers the following policies/issues are missing from R27 and should be included in any development in the Parish:

- HPC **supports SS2 – Sustainable design strategy for the district, Point 6:** 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 – Sustainable design**.
- **Water consumption:** HPC **supports Policy DS6**, Point 2 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
- **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 Pollution and tranquility**, especially Points 4 and 5.
- **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.
- **HPC supports DM 16 – Water Pollution, Point 5, especially in relation to R27:**
“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 to “surface water runoff and ensuring discharge locations have capacity to receive all foul and surface water flows” from a development.

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

C. DS12 Rural Economy and DS25 Renewable Energy and carbon sequestration
2017 CC1 and DBE2
Planning Application CA/21/02265 – example of “unintended” consequences in the rural economy
Policy DS15 – Highways and parking

1. **Policy DS12 – Rural economy**

HPC **supports** the ambitions of Policy DS12, especially Points 1 and 3.

The Parish is rural and currently supports equestrian businesses, horticulture and renewable farming. Protecting BMV land is essential for food security and also encourages biodiversity.

Understanding the scope for economic development and local employment will be researched through the Neighbourhood Plan. Bearing in mind the ambitions of **SS4, Point 4**, the Wildwood Trust and Wealden Forest Business Park are developing into employment centres which are easily and safely accessible by bicycle from Hoath by crossing East Blean Wood on Hicks Forstal Road. Likewise, the Public Rights of Way leading to Hersden and Herne and Broomfield give access to employment opportunities.

HPC **supports** Policy **DS14, Point 1 – Active and sustainable travel** and Policy **DS6 – Sustainable design, Point 7** in this context.

2. **Policy DS25 – Renewable energy and carbon sequestration**

HPC **rejects DS25, Point 1** in its current iteration.

This point contains a threat to the countryside and rural communities due to sweeping aspirations unsupported by criteria with which to assess the medium to long term impact of, for example, free standing energy installations (such as large scale industrial solar parks) or the impact on rural infrastructure, residents and settlements of industrial scale farming related to growing renewable energy crops.

In addition, **Point 1** includes no caveat about what is, or is not, an “appropriate” location. For example, there is no mention of BMV land, heritage, or landscape.

This policy must be **rewritten** with clear definitions and criteria and the significant role of community consultation and involvement must be strengthened.

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.

3. Hoath Parishes experience of “unintended” consequences when an incorrect policy is applied in assessing an agricultural development/business

Based on our experience here in Hoath Parish, HPC urges caution in how renewable energy projects and policies are implemented. Given the capacity such projects have to create significant consequences for people living nearby, communities must be actively engaged by the council and the individual or organisation initiating such a project in commenting on, assessing its impact and developing it.

Everyone understands the need to achieve Net Zero. Climate Change is pushing us all to rethink how we live our lives and our energy sources. Parishioners in principle support farming and farmers, and renewable energy depending on the kind, scale and location.

Parish frustration with the renewable energy agricultural practice through and around the Parish and its local impact is rooted in deep knowledge of the environment and farming in the Parish, and the observation that residents’ concerns are being minimised as those of “coffin dodgers” or complainers “who don’t understand 21st century farming” or are flatly ignored.

HPC therefore **supports** the intent of **DS25, Points 3, (a), (b), (c), (d), (e), 4, 5(b), (d)** but **urges rewriting to strengthen them** and ensure they are rigorously applied when assessing a relevant project.

Example of a local rural/agricultural initiative and its “unintended” consequences – Hoath’s battle to be heard continues

Planning Application CA/21/02265, Land South of Marley Lane, Hoath, Canterbury, Kent: Installation of digestate storage Ecobag with construction of bund, September 2021

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).

Application **CA/21/02265** is part of the continuing expansion of the agricultural renewable energy business based at Saint Nicholas Court Farm (SNCF), North Thanet. SNCF, The Farm Energy Company and Finn’s real estate are fundamentally the same entity as they are owned/directed by the same person. Church Farm was bought by SNCF in 2015/16 when it introduced renewable energy crops to the local fields (primarily wheat, barley and maize).

Since then, HPC and Parishioners have increasingly raised concerns about the impact this intensive industrialised approach to farming is having on daily life in the Parish and its environment, and especially that of the scale of the equipment used in relation to local infrastructure and associated damage.

According to a talk given by SNCF's manager in Broad Oak Village Hall at the end of 2022, SNCF/The Farm Energy Company owns or leases 25 farms/9500 acres/3500 hectares between Whitstable to Sandwich, including Church Farm in Hoath.

In other words, since 2015/16, projects relating to Church Farm, Hoath, have not been restricted to the Parish as the name implies and interpreted by Planning. Rather, Church Farm is only one piece in a significant renewable energy business in East Kent. Therefore, uniquely applying policies such as 2017 Local Plan policies EMP 12 and 13 (agriculture related) when assessing the validity and possible impact of **CA/21/02265** omits the broader business context and implications of the application. The "digestate pit" was built under permitted development in 2019 and enlarged in April 2020. The current planning application is a retrospective planning application.

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.

Please note: HPC made the above points by applying CC1 and DBE2 in its objection to **CA/21/02265** presented to CCC's Planning Committee on 21 September 2022.

4. Policy DS15 – Highways and parking

HPC **supports** this policy and urges implementation of the following to assist in resolving the transportation issues highlighted throughout this feedback report related to

- The designation of the village of Hoath and its sustainability
- Termination of public transport to and from the village
- School related traffic
- Increased traffic resulting from D27 as it currently stands
- Large-scale agricultural traffic related to **CA/21/02265**

DS15, Point 3: HPC **suggests** a transport statement or assessment and a travel plan from SNCF to reduce the impact of the agricultural traffic related to CA/21/02265 on Parish roads, particularly from A299 to the site of the digestate pit; **and Point 3 (c), Point 4** (Proposals for development will be refused) **(a), (c), (d); Point 6, (b); Point 7 (b).**

**D. Environment related policies (SS1, DM16, DS19, DS21, DS22, DS23)
Climate Change Topic Paper and site SLAA280 with related environmental policies**

**The Canterbury District Tree & Woodland Strategy 2022 – 2045
2017 Local Plan Policy T16 Rural Lanes**

1. Policy SS1 – Environmental strategy for the district

- HPC **welcomes Point 2** which states “the network of green and blue infrastructure—including rivers streams and ponds – in the district, which provides important habitats, valued landscapes and spaces for recreation and which supports our health and wellbeing, will be protected, maintained and enhanced in line with **Policy DC 19** (Habitats, landscapes and sites of local importance).”

Point 2 will thus support Hoath’s streams and wetlands, notably North Stream, the Rushbourne and the Nethergong Penn and Valley, seasonal springs, and associated habitats.

- HPC also **welcomes Point 3** related to supporting and sustaining the full recovery of the Stodmarsh Nature Reserve.
- HPC **supports Point 4** with the focus on Biodiversity recovery and Opportunity Areas, particularly relevant with the acknowledged need to restore hedgerows (The Canterbury District Tree & Woodland Strategy 2022 – 2045) and the Nethergong Valley wetland.
- HPC **objects to Point 7** which states that “large scale carbon sequestration and renewable power generation will be encouraged in suitable locations across the district.”

HPC **believes Point 7 is an unacceptable** risk to the countryside and the “valued landscapes” referred to in **Point 2**; it also contradicts the spirit of **Policies DS12 and DS22**.

Consequently, HPC advises **rewriting Point 7 to state the 2045 Local Plan does not support large-scale energy parks on BMV land and those that damage “valued landscapes.”**

2. Policy DM 16 – Water Pollution

HPC supports this policy, especially Point 1, Proposals to enhance existing aquatic environments and ecosystems will be supported and **Point 5**, Agricultural development of changes in lands 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.

3. **Policy DS19 – Habitats, landscapes and sites of local importance**

HPC **supports** this policy, especially **Point 3** which includes mention of Blean Woods (East Blean woods are part of the Parish), the Wantsum Channel and Stour Valley. As previously discussed, the Parish includes the Nethergong valley wetland, part of the Sarre-Penn/Nethergong inlet/Wantsum Channel, which are in turn part of the Stour Valley Catchment area analysed in **CCC’s Draft Nutrient Mitigation Strategy**. (Figure 1, marked in yellow, the Stour Marshes)

4. **Policy DS21 – Supporting biodiversity recovery**

HPC wholeheartedly **supports** this Policy. Elements will be expanded on the Hoath’s Neighbourhood Plan.

5. **Policy DS22 – Landscape Character.**

HPC also **supports** this policy wholeheartedly. Elements will be expanded on the Hoath’s Neighbourhood Plan.

DS22 lists rigorous conditions which Planning must apply when assessing an application for development.

Point 3 is particularly significant:

“Proposals for development which would cause significant harm to the landscape character of an area will be refused.”

This Policy must also be rigorously enforced in close consultation with local communities and Parish Councils.

HPC **supports** the council checking this draft Local Plan for proposals which **breach Policy DS22** and urges CCC to remove them from this draft.

6. **DS23 The Blean Wood Complex**

Hoath is **delighted** about the Wilder Blean project which includes expanding East Blean’s footprint to include Buckwell Wood, part of Hoath Parish. (Canterbury Landscape Character Assessment and Biodiversity Appraisal, Figure 7: The Blean Woods Local Landscape Designation)

7. **CDLP2045-CC01 CCC Climate Change Topic Paper (October 2022)**

HPC **objects** to this document as **it does not prioritise solar installations on rooftops or brownfield sites**; instead, it is imprecise, referring to a “rapid increase” in installations “of all types.”

Such loose assertions should not be allowed to stand as evidence for the draft Local Plan, particularly in a period demanding detailed resistance to Climate Change and Biodiversity

loss, and a renewed awareness, due to the war in Ukraine, of the significance of BMV land to assure the nation's food security.

HPC notes that the same criteria have not been applied across the various Topic Papers. There are variations depending on whether, in the Call for Sites (tables in the Topic Papers were compiled based on the call for sites) a site was intended for housing, open space or energy plants.

The NPPF states that BMV land should not be used for large renewable energy generation, however CCC's Climate Change Topic Paper does not refer to this. The few sites submitted for renewable energy generation, and were rejected, were either too small to generate significant energy or a nature reserve. No consideration has been given to BMV land.

In section 6.3 of the Climate Change Topic Paper the renewable energy SLAA sites are all listed and referred to as "currently agricultural land." As noted above, Policy constraints around the use of BMV agricultural land for energy parks exist, but this is never mentioned in what is either selective use of information or the result of lack of time to complete research.

8. **Site reference SLAA280, Marley Lane Solar Farm between Hoath and Chislet**
(CDLP2045-CC01 Climate Change Topic Paper, 6.3 Renewable energy site assessments)

HPC **opposes** this project and its location, and in the context of rapidly changing technological advances in the area of renewable energy sources.

Based on the following, **HPC considers this project has no place** in the 2045 plan, should be **removed** from the Climate Change Topic Paper and **from consideration** as a district renewable energy project. At the very least the site should be marked as **unsuitable**.

Reasons for HPC's objection:

- **Scale and Location:** The proposal is to build a 250-acre (101 hectare) solar farm and battery storage facility together with potential co-location of wind turbines **on grade 1, 2 and 3 agricultural land (BMV land)**.

This vast industrial energy generation site would cover the entire northern slope of the Nethergong Valley between Hoath and Hersden. The site would stretch from Hoath in the east, encircle the hamlet of Chislet Forstal and continue to Hollow Street, Chislet, in the west, with Hersden on the opposite slope.

- The **NPPF** does not support building energy parks on BMV land.
- **Policy DS12 – Rural Economy, Point 3** protects BMV land.
- **The Draft Nutrient Mitigation Strategy (21160-NUT-RP-02/C01)** with discussion of **the Stour Valley River Catchment** and potential adverse impacts on the Stodmarsh

Complex. The Nethergong- Sarre Penn/Wantsum Channel, are part of the Stour Valley Catchment area. (Figure 1, marked in yellow, the Stour Marshes).

- **Policy DM 16 – Water Pollution**, the possible solar park would be a change of agricultural land use; **Point 5**: “Agricultural development or changes in land use will . . . 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 with its location in the Stour Valley Catchment area, and the seasonal springs in this area (not all noted on Ordnance Survey maps).
- **Policy DS 19 – Habitats, landscapes and sites of local importance, Points 1 and 3** because SLAA280 would negatively impact the areas listed.
- **Policy DS 21 – Supporting biodiversity recovery**, because **SLAA280** would negatively impact the following, especially **Point 2, (f)** Conserve and where possible enhance, connect or extend Public Rights of Way networks; **(g)**: Retain, protect and, where possible, enhance any notable ecological features of conservation value such as ancient woodland, semi improved grassland, hedgerows, trees, wetlands, river corridors and other water bodies, and habitats that offer breeding or feeding sites of local importance to populations of protected or targeted species
- **Policy DS22 – Landscape Character**
Proposal SLAA280 would contradict the Canterbury Landscape Character Assessment and Biodiversity Appraisal (October 2020), which forms part of the evidence for the draft local plan and which **Policy DS22** says must be strictly followed.
- The **Development Management** section of the **B2 Nethergong chapter** of the 2020 Landscape Character Assessment says that any development must:
 - “Conserve the historic field pattern of the landscape by avoiding unsympathetic culverting of water courses
 - Conserve the open and undeveloped ‘remote’ undeveloped character of the landscape, avoiding the further introduction of large scale or incongruous elements.”
- The **Development Management** section of the **H2 Hoath Farmlands chapter** of the 2020 Landscape Character Assessment says that any development must:
 - “Conserve the open and rural landscape and avoid the introduction of large scale or incongruous elements in order to retain long distance views.”
- The extensive period of construction and the vehicles used would negatively impact the heritage buildings and historic infrastructure of the area and thereby contravene the intention of **DS26 Historic environment and archaeology**.
- The EIA screening opinion request **Ref. No: CA/21/00812** (April 2021) was carried out prior to the formulation of **Policies SS1 (Point 2) and DS21** and full acknowledgement of the significance of wetlands as part of Biodiversity Recovery.

The criteria used for assessing the EIA are thus out of date and do not reflect these priorities.

- **Fire and contamination hazard.** The location of the battery energy storage is adjacent to residential properties in Hoath, Chislet Forstal and Chislet, and homes in Hersden (**Policy D13**). The Lithium-ion battery technology is a fire hazard posing risks to public health related to containment of the fire, leakage of contaminants into the water table, and smoke diffusion related to the batteries. There is also a risk of explosions and the release of toxic combustion products in the event of failure.
- **Noise:** the potential solar farm and/or wind turbine, will be in the Nethergong Valley and close to housing (as noted above), including **Policy R13 – Land at Hersden**. HPC supports **DM17 -- Noise Pollution and tranquility**, reflecting the evidence of Figure 3.9 Tranquility in the 2020 Canterbury Landscape Character Assessment and Biodiversity Appraisal.
- **Glint and glare** from the sun on the solar panels will impact residents of Hoath, Hersden, Chislet Forstal and Chislet, and drivers on the A28.
- **Visual Impact** of battery containers and associated infrastructure (refer to **Policy DS22**)
- **Security lighting** around a potential solar park would affect the area’s dark skies. **As noted earlier**, Hoath currently benefits from NO light pollution and HPC aims to conserve this.
HPC therefore **supports DM18 Light Pollution and dark skies**, reflecting the evidence of Figure 3.10: Levels of Dark Skies and Light Pollution in the 2020 Canterbury Landscape Character Assessment and Biodiversity Appraisal.

9. The Canterbury District Tree & Woodland Strategy 2022 – 2045

HPC is **enthusiastic** about this document and delighted that hedgerow restoration and conservation are emphasised. As noted earlier, the Parish has a degraded hedgerow network (Plan 9: Hedgerow Areas – Landscape Character Assessment) and is focussed on strengthening its biodiversity. Hoath’s Neighbourhood Plan will develop this further, especially in the areas of wetland, woodland and hedgerows.

10. 2017 Local Plan Policy T16 Rural Lanes

HPC supports this policy and urges it be included in the 2045 Local Plan as it provides specific guidance on protecting a key feature of our historic landscape.

This policy states:

“Rural lanes which are of landscape amenity, nature conservation, historic or archaeological importance will be protected from changes and management practises which would damage their character, and where possible be enhanced.”