



Our Ref: JS/MC

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FINN'S

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12th May 2026

Dear Sir/Madam,

Response to Regulation 19 Consultation – Local plan to 2040 – Draft Policy R19 – Land at Church Farm, Hoath

I am writing on behalf of the landowner, St Nicholas Court Farms Limited, to support the residential allocation proposed in Emerging Draft Policy R19, land at Church Farm, Hoath.

Soundness

The Framework paragraph 36 sets out the test for soundness against which a Plan will be examined; positively prepared, justified, effective and consistent with National Policy. In respect of Policy R19, it is considered that the Plan is sound.

The Emerging Plan Policy R19 suggests some 17 dwellings could be accommodated within the site with the use of the word 'approximate'. It is assumed therefore the use of the word 'approximate' leaves open the option to provide more or less dwellings if a suitable layout can be achieved.

The Emerging Local Plan identifies an overall housing delivery need of 23,085, which is a significant figure and therefore all potential dwelling numbers within proposed site policies should be 'approximate' leaving room for higher dwelling numbers to be supported provided the site layout is acceptable in all other matters of planning consideration.

We are pleased to see the requirement for 20% BNG provision has been removed from the Policy. It is noted this falls now to be addressed under Policy DS25 for which a separate response to this Consultation will be made.

The Emerging Policy still includes at 1b(i) a requirement for 'provision of new local shopping and community facilities or other community infrastructure'. The idea for community shopping came originally from the Parish Council in 2021 but in later responses to Regulation 18 Consultation, the Parish removed this request as they had no-one interested in running a community shop within the village. It was requested this wording be removed from the Policy. The Parish Council in 2025 asked for the provision of a play area with play equipment as Hoath does not currently have such a facility. It is noted that the proposed policy wording does support 'or other community infrastructure' and clarity is sought as to whether this would include a play area with play equipment.

The Housing Needs Assessment was updated in July 2025 by Edge Analytics on behalf of Canterbury City Council. Importantly this has identified a new higher figure of 1,215 dwellings per year Local Housing Need (Edge Analytics LHN Assessment Update, July 2025, paragraph 2.26). The findings suggested that whilst the demand

Finn's is the trading name of Finn's (1865) Ltd. and incorporates Amos Dawton & Finn.

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Registered Number 3231108

for smaller units exists in central areas, in suburban regions a need for larger family homes is prevalent. For Market Housing, the Update found (Table 21, paragraph 4.44) the highest need was for 2, 3 and 4 bedroom dwellings.

The net annual need for affordable units has also been identified, increasing to 558 units per annum, (a significant increase up from 464 affordable homes per annum in 2021). For affordable properties, the greatest need was identified for 2 and 3 bedroom properties (Table 22, paragraph 4.48).

This Assessment maintains need for both market and affordable homes in the District and also identifies an increased need since the previous Housing Needs Assessment was carried out, suggesting increasing need across the District. Some of this need can be met under Emerging Policy R19.

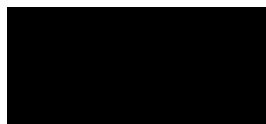
Conclusions

The land is in single ownership and there are no known constraints to the development occurring within the first 5 years of the Plan Adoption. The site is in a sustainable location, opposite Hoath Primary School, and in a central location within Hoath. It is available and achievable.

An outline planning application is currently under consideration by Canterbury City Council for 21 dwellings, under reference CA/25/01783, with access and layout to be agreed. A copy of the proposed site layout is attached for information.

The Policy is supported and the Plan is considered sound in respect of Emerging Policy R19.

Kind regards



Jane Scott BA(Hons) Dip.TP MRTPI

