

Hoath Parish Council response to Canterbury City Council's consultation regarding draft Local Plan 2042/2043 (Regulation 19)

18th May 2026

Hoath Parish Council (HPC) appreciates the time and dedication of Canterbury City Council (CCC) Officers over the past years who have been involved in researching, writing, and presenting several draft local plans for the benefit of Canterbury District. Thank you!

HPC has responded to CCC's draft local Plans 2045 Regulation 18 (2023) and 2040 Regulation 18 (2024), as well as CCC Local Plan Focused Consultation Regulation 18 (2025). HPC has referred to the 2017 Adopted Local Plan and draft Local Plan policies in assessing planning applications.

As a rural parish in the northern part of the district, between Sturry and Herne Bay, HPC welcomes the opening vision, strategy and supporting policies of the 2042/43 draft Local Plan. We recognise the need to respond to the impacts of climate change has become more urgent internationally, nationally and locally, and that "tackling congestion, air pollution, housing, improving community infrastructure, protecting heritage, significant landscapes and habitats, restoring our rivers and water quality, and working towards achieving net zero" are priorities.

HPC is however alarmed by the findings of the **State of Nature 2025** (Natural England) which reports that "the UK remains one of the most nature-depleted countries globally", while the **Canterbury District Biodiversity Strategy** (pp.17) states that "the district has historically suffered from a decline in biodiversity, and it is critical that this is reversed quickly." The Strategy emphasises "Our natural world is under pressure as never before. There is a need to take urgent action to halt the decline and to expand and increase biodiversity." With that in mind, "embedding biodiversity into CCC strategy and policy" can only be supported.

The **State of Nature in Kent** report (2021) identifies "loss of habitats to development and infrastructure, intensification of farming, pollution, a decline in managing land to support nature and invasive non-native species" are some of the reasons for the decline in nature. The result is that "remaining areas of habitat are often small and isolated from each other, making them more vulnerable and meaning that nature cannot move between them."

District recognition that action is needed has been acknowledged by CCC's unanimous adoption of its **Climate Change Emergency Declaration** in July 2019 and **Biodiversity Emergency Declaration** on 19 October 2023.

Given the preceding context, drawing on its experience of local planning applications and resident feedback to the **Hoath Parish Neighbourhood Plan Questionnaire** (2025), and based on evidence on the ground as a rural parish, HPC considers the 2042/43 draft Local Plan should be a call to action for everyone living and working in the district, communities,

local government, landowners, businesses and partners (e.g., Environment Agency) to collectively address the climate and biodiversity crisis.

Policies must be proactive, not reactive. They must give clear direction to planners, developers and applicants in how to mitigate climate change and achieve Nature restoration over the next decades to achieve broader goals and ambitions, such as housing development.

Hoath Parish character

- The Parish consists of Hoath village and five settlements on the site of the original farms. There are approximately 500 Parish residents and some 220 residences. With our rural roots, the following resonates.
- Responses to the **Hoath Parish Neighbourhood Plan Questionnaire (2025)** reveal residents love where they live and want to conserve the historic and rural character of the Parish for future generations, while also adapting to the times. Priorities include the need for public transport, sustainable design, protection of dark skies, care for the local landscape and environment, preserving best and most versatile (BMV) agricultural land as well as the parish's rural character.
- With housing developments in Hersden, Herne, Herne Bay and Beltinge expanding, Hoath Parish is increasingly a "green lung" for district residents in the northern part of Canterbury District offering "a rich environment and valued landscapes supporting wildlife and biodiversity." Fields and woodland are intersected by Public Rights of Way, and open-air pleasures, like riding and hiking, contribute to "the health and wellbeing of surrounding communities.
- Parish landscapes are covered by four designations in the Canterbury Landscape Character Assessment and Biodiversity Appraisal (October 2020)**The Parish landscape profiles** described in Canterbury Landscape Character Assessment and Biodiversity Appraisal (October 2020) are: H2 Hoath Farmlands, C4 Ford and Maypole Mixed Farmlands, D4 East Blean, E2 Sarre Penn Valley.
- Our parish connects with the following landscapes: B2 Nethergong Sarre Penn Inlet, B1 Chislet Marshes and Snake Drove, F3 Hersden Ridge. Figure 3.10, in the 2020 Landscape Character Assessment locates Hoath Parish in a dark skies zone.
- Canterbury District Local Landscape Designations Review and Recommendations (Final report January 2021), links Hoath to two areas of High Landscape Value (AHLV), **The Blean and The Wantsum** AHLV.
- Hoath Parish is included in the Strategic Access Management and Monitoring Strategies (SAMMs) for the Thanet Coast and Sandwich Bay SPA or Ramsar, known as **East Kent SAMMs (East Kent Bird Wise)**.
- The River Stour (Kent) Internal Drainage Board's (IDB) definitive map of the Stour Valley drainage area includes the Wantsum Channel AHLV, the Sarre Penn river valley (E2, the Sarre Penn Valley), the Stour and Stodmarsh <https://rsidb.org.uk/map-of-our-drainage-district/>
- The Nethergong-Sarre Penn river valley is functionally connected with Stodmarsh through wildlife, Public Rights of Way and the Wantsum Channel, all of which come together in the Stour Valley drainage area.

- **Conservation Areas:** The parish has two conservation areas -- **Hoath, Tile Lodge, Rushbourne** and **Ford, Maypole, Oldtree** – collectively with 20+ listed buildings (Historic England) and remaining mediaeval field patterns.
- **Transportation:** Hoath Parish has had no public transport since 2022 and the **Canterbury District Bus Action Plan Report February 2026** indicates that if public transport is to be reinstated, this will not be before 2040 (Figure 6-3: Canterbury rural services 2042), the lifetime of this proposed Local Plan.
- **Hoath Village has** no bus service/public transport, employment area, medical facilities, gas mains, cycleways or shop; few pavements; power cuts and persistent water and drainage issues; rural roads not wide enough to have a central line defining directions of travel; liveries, a primary school, church, village hall, Public Rights of Way, allotments, farmers.

Applying Planning policies to applications in Rural Areas – considerations

1. Equal weight must be given to how Local Plan policies are applied to rural and urban applications, i.e., applying policies must be even-handed.
2. Desktop assessment appears to be how most planning applications affecting the parish have been and are evaluated. This is problematic. Screens flatten landscapes, contour lines are not considered, and detail is lost. To counter this, there should be onsite visits by planning.
3. HPC is aware of an assumption about the countryside that if leaves are on trees and fields are green all is well. There is also a perception that rural areas are without development constraints (no one will notice!), that countryside is a green canvas to work with. As outlined earlier, nothing could be less true.
4. To rectify these perceptions, and counter “unintended consequences” for climate, biodiversity and Nature as a whole, we re-emphasise the thrust of the Draft Biodiversity Strategy (January 2026) with its spotlight on the need for partnership, for collaboration between “residents, businesses, partners (e.g., RSPB, NFU), parish councils, landowners, communities and developers” in addressing how the district will evolve, rather than the current adversarial approach. The latter is timewasting and counterproductive, even destructive.
5. Hoath Parish has been challenged by the consequences of renewable energy development undertaken according to **agricultural permitted development rights**. Permitted development rights appeared to trump all. The scale of its impact on parish highways, BMV land, biodiversity, landscape, wildlife, rural economy, resident wellbeing, conservation areas, listed buildings and heritage has been overwhelming. HPC therefore suggests considering **scale of impact** when considering such projects.
6. **Please Note:** There is no definition of Permitted Development in the Appendix 1, Glossary. **Please include if this kind of development is still supported, and if so, clarify its potentials and limitations.**

HPC suggests

- Local Plan policies must cross reference each other so that applicants and developers and local authorities recognise the **scope of impact** of a project, how each policy has repercussions on others (e.g., R20, Countryside; DS11, Rural Economy; DS26, Landscape Character – HPC has made suggestions) and should provide detailed evidence that has been undertaken – not superficial tick box acknowledgement.
- Experience with a solar farm application integrating new technology, revealed “solutions” to climate change and biodiversity loss are moving faster than the protections and guidance of Local Plan policies. **The result is that policies are reactive rather than proactive and/or do not reflect the expertise necessary to identify and mitigate new risks.** To this end, there should be enough flexibility for planning to appoint consultees who are experts in the new fields (e.g., battery energy storage systems [BESS] with lithium-ion batteries) to ensure that the district has the capacity to manage potential risks of such advances. See comments re DS29 Renewable Energy. With this in mind, HPC supports the SS7 Local Plan Review every five years.
- Applicants must **not be able to mark their own homework**, for example, on BNG plans, Agricultural Land Classification Assessments, transport and highways plans, impact on water sources and habitats. Analysing such studies, HPC has discovered miscalculations, misrepresentations and language intended to assure granting of applications, but which does not withstand local scrutiny.
- HPC alerts planning that planning mitigations and/or conditions to rural planning applications risk chipping away and weakening designations and the critical role they play in nature conservation; they can incrementally undermine the value of landscape, environmental and nature-orientated policies.
- HPC has experienced planning applications presenting as viable yet on closer scrutiny only superficially fulfilling planning policy requirements, i.e., they present as tick box exercises to move through the planning process.
- Too often applications take a siloed approach with the potential ramifications on neighbouring areas skated over, if even acknowledged.

Hoath Parish priorities

- Respecting resident response to the **Hoath Parish Neighbourhood Plan Questionnaire (2025)** noted above.
- **Supporting policies which mitigate the impact of Climate change and counter biodiversity loss.** The parish is experiencing changing weather patterns: strong winds are now extreme, rain comes as untimely tropical downpours, summers are hot, fields are parched, and hosepipe bans are regular. Currently, the east wind is blowing yet

winter is long gone, rainfall is once again well below the seasonal average, the ground is dry, farmers are already watering crops, and they predict a hose pipe ban (the last one lasted over six months) and, with it, heightened wildfire risk.

- **Protecting water supply**

- Multiple sources (e.g., the Met Office, South East Water) acknowledge that Kent is one of the driest areas in the UK and that changing climate patterns threaten county and district water resources. The evident impact of climate change on Hoath Parish, and, more broadly, the county supports this.
- HPC suggests adding a section in the introductory part of the 2042/43 draft Local Plan dedicated to **Water in Kent** which collates the issues touched on throughout the Draft Biodiversity Strategy (e.g., The Need for this Strategy_(p.17); **water abstraction** and impact on water levels pp. 40, 72).
- If development continues at the current rate, with changing weather patterns resulting in less rain to fill aquifers, will there be sufficient water to sustain the local population as well as the district's nature/biodiversity by 2042/43 especially if proposed housing targets are sustained? Government, business and community outrage at water shortages cannot force rainfall.
- Is it time for companies to become consultees on all developments, from granny annexes upwards? HPC has been told that water companies are currently only consulted concerning developments with more than 15 homes which means calculations around water capacity are inaccurate.
- In light of the above, HPC asks whether the proposed Broad Oak Reservoir (draft Local Plan **Policy R24 - Broad Oak Reservoir and Country Park**) will be viable especially as the water levels in the Sarre Penn are low, rainfall insufficient and the aquifers unreliable?
- And with the preceding in mind, how will the 2042/43 draft Local Plan guarantee the health of the Stour River Valley catchment area with its rivers?

- **Protecting Soil**

UK soil health is a significant environmental concern, with an estimated **38% of arable soils in England and Wales classed as degraded**. Major threats include severe compaction (e.g., during solar farm construction), erosion, and organic carbon loss.

In the spirit of CCC's Draft Biodiversity Strategy - Nature Recovery Plan and the broader context of CCC's Climate Change and Biodiversity Emergencies, HPC suggests including a section in the introductory part of the 2042/43 draft Local Plan dedicated to **Protecting Soil**.

The Glossary definition of BMV soil echoes the NPPF's – it defines but gives no insight into why it matters. **Protecting soil** should clarify why soil biodiversity is significant, how it can be cared for and improved, and why protecting BMV land is important (e.g., food security).

The Soil surveys and soil management strategies referred to in DS11 – Rural Economy as part of planning applications should undergo stringent independent review and should also be assessed in the context of a district Nature recovery plan.

The ultimate aim would be to emphasise to planners, developers, applicants and parish councils the urgency of needing to respond to biodiversity decline and how well-thought through BNG projects could support reversing this.

Local Plan Layout -- suggestions

- **Suggestion:** Include The River Stour (Kent) Internal Drainage Board's (IDB) definitive map of the Stour Valley drainage area which includes the Wantsum Channel AHLV, the Sarre Penn river valley, the Stour and Stodmarsh <https://rsidb.org.uk/map-of-our-drainage-district/>
- **For easy reference:** Include page references for the Local Plan Policies
- **Glossary** – Add detailed definition of Best and Most Versatile agricultural land and permitted development rights.

Hoath Parish Council comments re 2042/43 Draft Local Plan Policies

HPC has based its selection of policies on parish priorities and grouped them accordingly.

Settlements, Transport, Design

Policy R13: Local Service centres

Policy R19: Land at Church Farm.

Policy DS16: Movement Hierarchy

Policy DS17: Active and sustainable travel

Policy DS18: Highways and parking

Rural

Policy R20: Countryside

Policy DM15: Light pollution and dark skies

Policy DS13: Sustainable design

Water and Soil

Policy R24: Broad Oak Reservoir and Country Park

Policy DS11: Rural Economy

Policy DS12: Net Zero carbon ready and water efficiency

Policy R24: Broad Oak Reservoir and Country Park

Policy DS24: Sustainable Drainage and Water Quality

Policy DS12: Net Zero carbon ready and water efficiency.

Landscape, environment and biodiversity

Policy R23: Land to the South of Sturry Road - Strategic Wetland Mitigation

Policy DS2: Habitats of international importance

Policy DS21: Habitats and landscapes of national importance

Policy DS22: Habitats, landscapes and sites of local importance

Policy DS25: Supporting biodiversity recovery

Policy DS26: Landscape Character

Policy DS27: The Blean Woodland Complex

Renewable Energy

Policy DM13: Biomass technology

Policy DS29: Renewable and low carbon energy

Heritage

Policy DS30: Historic environment and archaeology

Policy T16 (Rural Lanes) has not been carried over **from the Adopted Local Plan 2017** into this draft nor incorporated into an appropriate policy in the 2042/43, however it plays a key role in preserving rural character.

Settlements, Transport and Design

Policy R13: Local Service centres

For clarity, Hoath Parish is not being designated a Local Service Centre; Hoath Village, the largest settlement in the parish, is proposed to play this role.

If the Village of Hoath is to play the role of a Local Service Centre, its current designation in the draft Local Plan (2042/43), and fulfil the aspirations of SS1, SS2, SS3, SS4, SS5, SS6, the starting point needs to be addressing residents' priority – **reinstatement of public transport**.

HPC has **questioned the sustainability** of Hoath Village's proposed redesignation as a Local Service Centre since 2023 on account of

- lack of public transport to and from the parish since 2022
- narrow access and exit roads off the main road (Hoath/Maypole Road linking the A28, Sturry and Hillborough) to reach Hoath Village (the village is set back from the main road; the proposed development even more)
- distances from the Village to surgeries, main urban areas for shopping and all other services (see below).

Further handicaps are the narrow rural roads lined by hedgerows which are too narrow for bicycle lanes and dedicated pedestrian footpaths. As it is, pedestrians, cyclists, horses, large agricultural vehicles and private cars must share the same lanes and roads.

Hoath Village's isolation from services (using Google maps) and dependence on private cars

- The Canterbury to Herne Bay Bus, stop is on Canterbury Road at the entrance to Wildwood. Hicks Forstal Road is the unlit single lane rural lane travelling through East Blean Woods connecting Hoath with Wildwood. **Distance measured from Hoath Parish Hall (in the village centre):** 2.2 miles; car: 6 mins; on foot: 44 minutes, bicycle, 13 minutes.
- The Canterbury to Margate Bus, bus stop is on the A28 in Rural Service Centres, Sturry and Hersden, and Upstreet village. **Distance measured from Hoath Parish Hall (in the village centre):** Each stop is roughly 2 miles away from Hoath Parish Hall; car, 7 minutes; on foot, 44 minutes; bicycle 12 minutes.

- Nearest Health Services to Hoath Parish Hall

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

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

Distances and timings to all other services -- food shopping, banking, recreation – are comparable.

HPC notes that **SS5 Movement and Transportation Strategy** for the district, point 3, 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.*

However, **The Canterbury District Bus Action Plan Report** (February 2026) indicates that if public transport is to be reinstated to Hoath, **this will not be before 2040**, effectively the lifetime of this proposed Local Plan (Figure 6-3: Canterbury rural services 2042).

In addition, HPC notes there is **no indication how funding for public transport will be achieved** -- funding opportunities for public transportation has been a perennial problem.

Hoath residents should not have to depend on vehicle ownership to run their lives nor shoulder the environmental impacts of ever-increasing local traffic which would contradict the draft Local Plan's environmental priorities.

Considered together, **for Hoath Village to be sustainable, and function as a Local Service Centre hub for the surrounding parishes, public transport must be reinstated and**

guaranteed. As there is no strategy for this situation to be improved, Hoath Village should return to its status as a village.

Policy R19, Land at Church Farm

HPC has **objected** to this policy in its **response to Application CA/25/01783**, Outline application for the erection of 21 dwellings with associated parking, access roads, open space and play area (with all matters reserved except access and layout) | Land at Church Farm Hoath CT3 4LA

HPC recognises that Policy R19 presents some potential for contributing to the sustainability of Hoath Village and parish in terms of providing opportunities for some local shopping and community facilities or infrastructure, as well as affordable and accessible housing, and an appropriate housing mix.

However, as years have passed, this proposed development unfortunately increasingly presents as an island in a rural sea. The development's qualities are undermined by **residents' complete dependence on private cars for accessing all services and urban centres, as there is no public transport service.**

Please Note description of Hoath's isolation from key services in HPC's comment re Policy R13, Local Service Centre, and DS17 (Active and sustainable travel).

As noted in comments related to R13, Hoath Parish has had no bus service since 2022. While **SS5 Movement and Transportation Strategy for the district, point 3**, 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*, this spirit is undermined by the **Canterbury District Bus Action Plan Report** (February 2026) which notes that if public transport is to be reinstated to Hoath, this will not be before 2040, effectively the lifetime of this proposed Local Plan (Figure 6-3: Canterbury rural services 2042).

In addition, **opportunities to improve cycling/walking access and safety** are restricted to the footprint of the development itself. Beyond the drive up from School Lane (the line of the arrow) there is no other opportunity to introduce cycling lanes in the parish. The roads are too narrow to incorporate a dedicated cycle lane or more than the existing pavements in Hoath Village.

Also to consider in this policy assessment are:

- **Resident responses to the Land at Church Farm policy in the Hoath Parish Neighbourhood Plan Questionnaire.** Seventy percent (70%) of resident responses are opposed to the Church Farm development because of its scale (21 houses versus the proposed 17 proposed by the policy); destruction of BMV land; the increased number of private cars and delivery vehicles on narrow rural roads; safety issues associated with the location of the development's exit on to School Lane opposite the primary school

- **CCC's Transportation Officer's assessment of CA/25/01783 (10 October 2025):**
I do not consider that this site has sustainable transport links. The nearest public transport services are too far away to be meaningfully accessible, and although there are footways in parts of the village, there are no designated cycle routes.
- Parish dependence on private cars and the parish road layout conflict with Policy DS16 (Movement Hierarchy) and the ambitions of the Local Plans environmental ambitions (e.g, achieving net zero).

Policy R19 naturally further conflicts with Policy DS17 (Active and Sustainable Travel) because there is no bus service but also given the road/travel constraints of the development's location, para 6.83 when it states: "Within Urban Areas and, where appropriate, in . . . Local Service Centres, new residential developments should be located where residents can easily access bus services, which can also provide onward access to rail and, where appropriate, developers will be expected to integrate high-quality bus infrastructure within development sites and to contribute to enhancements to bus services, such as through improved routes and/or frequencies."

- **Referring to the parking and transport/car data provided by the CA/25/01783 applicant** in the Illustrative Parking Layout and Vehicle movements in the Location Details, car movements could conceivably double (Church Farm development plus school traffic) down School Lane (some 500 trips per day). This traffic would queue at one of two T-junction bottlenecks to exit School Lane (Maypole Lane at one end, Mill/Church Road at the other, both rural lanes allowing only one car passing). Maypole Lane and Mill/Church Road, after some distance, join Hoath/Maypole Road, the main road linking Hillborough, the A229 with Sturry.

HPC questions

- Given **the current parish dependency on private cars for transportation**, how does development will reduce the District's/Parish's carbon footprint?
- How day-to-day needs can be met without locking in car dependency and harming countryside, tranquillity, heritage, biodiversity, landscape character, rural lanes, settlement setting or biodiversity?
- How approximately 170 extra road users a day in and out of the heart of Hoath Village will contribute to the overall sustainability of Hoath Parish?
- How increased car use respects the parish's heritage profile defined by its two Conservation Areas – Hoath, Rushbourne, Tile Lodge and Ford, Maypole, Old Tree – and the impact on the historic landscape and buildings?

Policy DS18 (Highways and parking), Point 4, drawing on the NPPF (December 2024, Chapter 9, Promoting sustainable transport), **defines why R19 should be refused:**

"Proposals for development will be refused where:

- a) The development design and transport strategy does not follow the Movement Hierarchy;
- b) The development would prejudice the delivery of key transport infrastructure requirements;
- c) The development would lead to unacceptable highway safety;
- d) The residual cumulative impacts on the road network would be severe."

As matters stand in May 2026, when considering the preceding points in relation to the parish's unsustainable transport and highways issues, and in the context of the policies in the draft Local Plan and the NPPF criteria for assessing sites and promoting sustainable transport, **HPC urges Policy 19 to be withdrawn from the 2042/43 draft Local Plan.**

Policy DS16: Movement Hierarchy

HPC supports the hierarchy, however, regrettably, as noted earlier in our response to R19 (Land at Church Farm), and R13 (Local Service Centres) parish roads and the layout of roads within Hoath Village and the parish do not support the hierarchy. Instead, as there is no public transport service to the district's urban centres or neighbouring parishes and commercial centres, residents depend on private cars and the generosity of family and neighbours to run their daily lives.

As noted in comments about R13 and R19, parish roads and lanes are too narrow for cycle routes and pavements.

DS16 is however a constructive way of highlighting how residents and developments should rethink transportation and how our roads and village and town centres should adapt to achieving net zero goals.

If it is possible to put this hierarchy into action, it will contribute to reducing air pollution, improving health and wellbeing and community life.

Policy DS17: Active and sustainable travel

HPC supports Policy DS17 and supports making active and sustainable travel part of new development from the outset. A vision of a network of routes making walking, cycling and public transport efficient and timely, linking to bus and rail, is encouraging, particularly from the perspective of reducing carbon emissions and cars on roads.

HPC especially supports protection of Public Rights of Way given they make the countryside accessible to everyone.

This policy needs strengthening however, to ensure young families, older and disabled people, and everyone who depends on public transport for the efficient running of their daily lives, have access to regular public transport service and good connections between, to and from, urban and rural developments to health and commercial services and transport hubs, thereby making car journeys redundant.

Policy DS18: Highways and parking

HPS supports the effort to take into consideration the increase in traffic and potential damage to the highway networks resulting from new developments. We also support the

consistent referral to the Movement Hierarchy as part of designing district travel routes and reducing car use as well as the impact of freight and deliveries. The effort at rationalising location and design of parking and sites for EV charging are appreciated.

HPC agrees with the flexibility and realism demonstrated by DS18 Point 4 which notes that “proposals for development will be refused”, for example, when “a) development design and transport strategy does not follow the Movement Hierarchy; b) the development would prejudice the delivery of key transport infrastructure requirements; c) the development would lead to unacceptable highway safety; d) the residual cumulative impacts on the road network would be severe.”

From a rural perspective, HPC particularly supports Point 6, e) “encouraging Heavy Good Vehicles (HGVs) to use the primary route network – this is a priority to protect rural roads and conservation areas.

Rural

Policy R20: Countryside

This is a core policy in this draft Local Plan; however, it needs clarifying and strengthening if it is to reflect the climate and biodiversity crises the area is facing. The relevant policies must be spelled out at every opportunity so that those consulting the Local Plan for planning guidance are reminded of these priorities. There is urgency to this. As mentioned earlier, Canterbury City Council has declared a Climate and Biodiversity emergency.

HPC welcomes that Policy R20 aims to protect the countryside from inappropriate development and the definition of countryside as land “outside the Urban Areas, Rural Service Centres and Local Service Centre boundaries.”

However, in the interest of presenting a complete definition of how the countryside needs protecting, **particularly in the context of net zero, stressed water sources and biodiversity loss**, and reminding developers and planners that rural communities have the same interests and concerns as urban ones, the following policies should also be listed for **cross referencing** policies:

DS1 (Affordable Housing), DS2 (Housing Mix), DS4 (Rural housing), DS11 (Rural economy), DS12 (Net zero carbon ready and water efficiency), DS13 (sustainable design), DS14 (Digital infrastructure), DS15 (Infrastructure delivery), DS16 (Movement hierarchy), DS17 (Active and sustainable travel), DS18 (Highways and parking), DS19 (Air quality), DS20 (Habitats of international importance), DS21 (Habitats and landscapes of national importance), DS22 (Habitats, landscapes and sites of local importance) , DS23 (Flood risk), DS24 (Sustainable Drainage and Water Quality), DS25 (Supporting Biodiversity recovery), DS26 (Landscape character), DM2 (Residential garden land), DM6 (Extensions and alterations to existing buildings), DM11 (Residential design), DM14 (Noise, Odour & Dust pollution), DM15 (Light pollution and dark skies), DM16 (Contamination and unstable land policy).

Please Note: Policy T16 (Rural Lanes) from the Adopted Local Plan 2017 has not been carried over into this draft, unlike other 2017 policy wording which has been integrated into appropriate policies in the 2042/43 Draft: *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, enhanced.* Currently, this policy protects, for example, trees, banks, ditches, roadside habitats, hedgerows, wildlife corridors and dark skies. It short, T16 reinforces the biodiversity ambitions of this Local Plan, supports protecting rural character and inhibits the urbanisation of highway works.

Policy DM15: Light pollution and dark skies

HPC strongly supports the spirit of this policy, particularly given the parish is still in a dark skies zone and our local wildlife continues to benefit from still living in a dark landscape. However, the policy needs strengthening through definitions. While we especially support Point 4, “Proposals for external lighting within areas of dark skies as recognised within the Landscape Character and Biodiversity Appraisal will only be permitted in exceptional circumstances”, the “exceptional” circumstances should be defined so subsequent planning debates can be minimised. The overall guiding principle is, after all, the urgent restoration and protection of Nature.

HPC notes that too often local planning applications, including residential and infrastructure (e.g., solar farms), do not consider the implications of lighting on the environment and HPC has to debate the case. Experience strongly encourages lighting strategies to be submitted with all development applications.

Policy DS13: Sustainable design

HPC is encouraged by the opening statement that the “Local Plan aims to ensure that all types of developments are sustainably designed, and as such design should be considered at the very outset of any development scheme”, and that the policy itself provides core design features and expectations.

HPC particularly appreciates the spirit of para 6.62 which describes Council involvement with local neighbourhood planning groups to prepare development briefs, design codes and/or guides to reflect local character and design preferences. We also support efficient use of land to avoid using greenfield land and settlements coalescing.

However, despite these good intentions, too many new developments replicate the flat facades of Lego houses. These are monotonous. Variety of façade and roofline should be encouraged to avoid this. Designs should also include all possible features to mitigate the impact of climate change, e.g., solar panels on roofs, insulated roofs and walls, water saving devices. DS13 should be strengthened by emphasising these points.

Water and Soil

Policy R24: Broad Oak Reservoir and Country Park

As Hoath Parish will be materially affected by this plan, given parish landscape designations (E2, D4, H2), HPC is represented on South East Water's Broad Oak Reservoir advisory group.

HPC has increasing reservations about the feasibility of this project and its focus as presented in the 2042/43 draft Local Plan. Surely water is the priority, given the impact of climate change and Kent/district water levels, not a country park.

In addition, the environmental disruptions and damage (e.g., soil displacement and associated biodiversity destruction with pipeline routing), landscape impact, noise and traffic associated with the reservoir's construction, are surely sufficiently significant and complex without the addition of a country park.

(The Country Park angle also sits badly with South East's engineers—they are clear that this is not the purpose of the reservoir.)

HPC recognises water resilience is an existential need for Canterbury district, and we also recognise that, if the reservoir is ultimately built, and the significant environmental impacts of its construction on the Great Stour, Little Stour, Broad Oak and the Sarre Penn are overcome, there might then be opportunities for public access and countryside recreation. Any recreation, however, should focus on nature and respect countryside tranquillity, protect landscapes and nurture biodiversity, not water sports!

For now, given the Biodiversity and Climate crises we are facing locally, nationally and internationally, protecting our water sources should be the priority.

As set out in our introductory comments, multiple sources – including the Met Office and South East Water itself -- identify Kent as one of the driest areas in the UK and that changing climate patterns threaten county and district water resources. CCC's draft Biodiversity Strategy identifies **water abstraction and the impact on water levels resulting from needing to service the demands of housing developments, increasing population, and infrastructure demands**. Overall, HPC is therefore concerned about the hydrological impact of the engineering involved in realising the reservoir and the building of the reservoir itself, on the Stour Valley catchment area and the Sarre Penn and its valley which connects to the Wantsum Channel AHLV, as well as the bordering parishes.

As noted earlier, out here in rural north Canterbury district, temperatures are rising, rainfall in the Canterbury district is increasingly irregular, aquifers are filling ever more slowly, water levels in the Sarre Penn have reduced over the decades (it is no longer a flowing river, rather a seasonal stream), and higher temperatures and less rain result in hosepipe bans and drought with the result that wild fire risks increase.

Within the preceding context, will the Broad Oak reservoir project provide a reliable answer to increasing pressures on Canterbury's water supply? Are the housing targets imposed on the district by national government realistic or even environmentally viable?

Broad Oak Reservoir is not expected to be operational until the mid-2030s at the earliest, close to the end of the lifetime of this proposed Local Plan, 2042/43.

A clear-eyed transparent appraisal of the sustainability of our water sources is urgently needed.

Policy DS11: Rural Economy

HPC supports the spirit of this policy which encourages the rural economy to diversify to adapt to our changing climate.

However, HPC urges stringency regarding preservation of **Best and Most Versatile (BMV)** agricultural land. (Please note earlier comments regarding **protection of soil** and explaining BMV land.) The NPPF in Chapter 15, **Conserving and enhancing the natural environment**, para 187, notes *"Planning policies and decisions should contribute to and enhance the natural and local environment by: a) protecting and enhancing . . . soils (in a manner commensurate with their statutory status or identified quality in the development plan); b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – **including the economic and other benefits of the best and most versatile agricultural land**, and of trees and woodland."*

With growing national concern regarding biodiversity loss and awareness of the importance of being able to guarantee national food security, BMV land is at last being recognised as a national resource that requires care and protection. In this context, DS11, Point 3, "In addition, any development on sites over 20ha, not allocated within this plan, on best and most versatile agricultural land will need to be supported by a soil handling plan and sustainable soil management strategy based on soils surveys" **needs strengthening**.

"...not allocated within this plan" leaves the door open to exploitation as does the requirement that **"a soil handling plan and sustainable soil management strategy based on soils surveys"** should be provided.

HPC suggests Policy DS11 should state clearly that BMV land **must not be lost** given the impact on landscape character, biodiversity, food security and so on. **Doing so would remind developers, planners, applicants and parish councils of its significance.**

And drawing on experience, HPC's urges care -- examination of an Agricultural Land Classification Assessment as part of a solar farm application revealed its results did not align with knowledge and history that the soil in question was Grades 2 and 3a and was arable crop and food producing for decades. **In other words, independent assessment and monitoring of handling plans and soil management strategies should be obligatory.**

Policy DS12: Net Zero carbon ready and water efficiency

HPC supports the aspirations of this policy, however the standards used to measure reductions in carbon emissions and climate risks must be monitored to ensure they are actually applied.

As noted, multiple sources (e.g., the Met Office, South East Water) acknowledge that Kent is one of the driest areas in the UK and that changing climate patterns threaten county and district water resources.

Anecdotally, local farmers are clear that if housing development continues at the current rate, with changing weather patterns resulting in less rain to fill aquifers, the risk is real that there will be insufficient water to sustain the local population as well as support district nature. They reflect that it is time that long term water capacity reflect results of changing rainfall patterns. Government, business and community outrage at water shortages cannot force rainfall.

Point 5, states “new developments must meet higher water efficiency standards” and that “proposals for non-residential development should maximise opportunities for water efficiency.” HPC considers this vague and suggests clarifying the “opportunities for water efficiency”, i.e., what does this mean?

In summary, carbon levels and water performance should be measurable, checked by an independent body (no marking own homework!) and, as water is fundamental to all infrastructure, calculations around future water availability should determine the sizes of proposed development and determine if developments are even viable.

Policy DS24: Sustainable Drainage and Water Quality

HPC supports the drainage hierarchy, the emphasis on SuDS, rainwater harvesting, greenfield run off rates, and that groundwater must be protected.

HPC suggests all houses should have water butts to capture rainwater runoff from roofs.

Bearing in mind that Canterbury District is water-stressed, HPC urges that water infrastructure be sorted out at the start of the development process, i.e., drainage, wastewater, water quality and groundwater protection measures must be shown to be in place before construction.

Please also refer to HPC comments regarding **Policy DS 12: Net Zero carbon ready and water efficiency**.

Landscape, environment and biodiversity

Policy R23: Land to the South of Sturry Road - Strategic Wetland Mitigation

HPC supports the designation of strategic wetland to allow the implementation of the Canterbury Nutrient Mitigation Strategy.

However, as the parish's landscape designations include E2 (Sarre Penn Valley) and its neighbours, B2 (Nethergong-Sarre Penn Inlet), B1 (Chislet Marshes and Snake Drove) and the Wantsum Channel AHLV, HPC strongly encourages strengthening protection of the district's wetland, associated wildlife and biodiversity in these landscape designations – they flow into each other. The Stour Valley catchment/drainage area is home to R23 and the preceding landscape designations.

HPC encourages the Local Plan to take a holistic approach to this area and support the Nature restoration ambitions for this area in Canterbury's Biodiversity Strategy (2026).

Policy DS20: Habitats of international importance

HPC supports the protections this policy intends and the overall intent of caring for our area's internationally recognised habitats and landscapes. It is particularly valuable from the perspective of our rural parish. This, together with the following policies, form a tool with which to counter potentially destructive proposals. Put another way, this is a holistic, multi-layered approach to care and protect Nature. Collaboration between parishes and planning is essential to ensure these policies restore and conserve our area's landscape, nature and biodiversity.

Policy DS21: Habitats and landscapes of national importance

HPC strongly supports the protective intent of Policy DS21, particularly its recognition that development within the Kent Downs National Landscape must further the conservation and enhancement of natural beauty, including tranquillity and dark skies. The emphasis on protecting tranquillity, nocturnal wildlife and rural character are consistent with the other policies related to biodiversity, landscape, environment and the countryside. Hoath parish and other rural parishes benefit by association.

Policy DS22: Habitats, landscapes and sites of local importance

HPC welcomes this protection to habitats, landscapes and sites of local importance, including Local Wildlife Sites, Local Nature Reserves, Regionally Important Geological Sites, undeveloped coast, Local Green Spaces, Green Gaps and Green Infrastructure Spaces. These designations protect the character, uniqueness, biodiversity and recreational value of the district and specifically, our part of the district.

Residents' responses to HPC's Neighbourhood Plan Questionnaire reinforce this approach and the importance of defending these landscapes with the same energy as national landscapes or SSSIs.

However, HPC alerts planning that planning mitigations and/or conditions to planning applications risk chipping away and weakening these designations and the critical role they play in nature conservation as these incrementally undermine the value of landscape, environmental and nature-orientated policies.

Policy DS25: Supporting biodiversity recovery

HPC believes DS25 lies at the heart of Local Plan landscape, wildlife and environmental policies and ambitions. Drawing on the outstanding research and presentation underpinning the Council's **Draft Biodiversity Strategy – A Nature Recovery Plan (2026)**, and the clearly defined Threats and Pressures, the 20% biodiversity net gain requirement for qualifying major development should be non-negotiable, even though the NPPF proposes 10% BNG. Respecting and implementing 20% is in the interest of everyone who wants a Climate and Nature they can survive and thrive in.

Policy DS26: Landscape Character

HPC is relieved that this policy acknowledges planning applications must take account of landscape character, seascape, tranquillity, long distance views, historic landscape features. Too often applications make tokenistic reference to a landscape designation and do not identify how a development might impact it.

Based on HPC's experiences with planning applications, assessing these against the ambitions of Local Plan policies would be more effective if DS26 expanded expectations by referencing the policies developers should address so that their proposals align with Local Plan ambitions.

Drawing on HPC's comments regarding Policy DS20 (Countryside), HPC suggests cross-referencing with these policies:

DS13 (Sustainable design), DS14 (Digital infrastructure) DS20 (Habitats of international importance), DS21 (Habitats and landscapes of national importance), DS22 (Habitats, landscapes and sites of local importance) , DS24 (Sustainable Drainage and Water Quality), DS25 (Supporting Biodiversity recovery), DM11 (Residential design), DM14 (Noise, Odour & Dust pollution), DM15 (Light pollution and dark skies), DM16 (Contamination and unstable land policy).

Policy DS27: The Blean Woodland Complex

Given Hoath Parish includes part of East Blean (D4), HPC strongly supports restoring, enhancing, expanding and improving connectivity between the blocks of ancient woodland,

broadly described as East and West Blean. We also support wider landscape restoration and protections against development that would damage this key Woodland.

For clarity, HPC **encourages the Local Plan to define The Blean Woodland Complex** so that its extent is understood by planning and developers. “Complex” is too vague. Including the names of the woods in the introductory paragraphs of the Local Plan or in the Glossary would help parishes that are connected to The Blean.

The Canterbury District Local Landscape Designations Review and Recommendations (Final report January 2021), includes landscape designations associated with **The Blean** in its dedicated chapter.

Currently, **The Blean** is generally understood to be a stretch of woodland close to Canterbury with bison and, until recently, wolves. Neither **West** nor **East Blean** are identified in the Biodiversity Strategy. **East Blean NNR**, is relatively unknown despite being *one of the richest of all Kent’s woodland habitats* as described by Kent Wildlife Trust. Only **West Blean** is named in the draft Local Plan **Policy R24 - Broad Oak Reservoir and Country Park**, in the context of West Blean & Thornden Woods SSSI (point 3).

Planning applications: Lack of clarity about **the area** The Blean Complex covers, which woodland is included, also means that planning applications do not appreciate the greater landscape connections between **The Blean – Hoath Farmlands – the Sarre Penn Valley - the Wantsum Channel**. As a result, when assessing applications, HPC battles to make the case about the impact of applications on the landscape, or that of applying the concepts of “setting” and/or “amenity” or explain biodiversity significance.

Renewable energy

Policy DM13: Biomass technology

HPC agrees with the constraints on use, however, urges stronger wording around the sourcing of biomass (refer to points 1 and 2) in the context of environmental concerns to reduce transport emissions. Unless precise information about the source of biomass is required and make and model of equipment is required, there is too much flexibility in interpretation which in turn will make a mockery of net zero and environmental ambitions.

Point 1, HPC suggests changing “biomass should be locally sourced” to “**must** be locally sourced”; “locally” **should be defined**.

Point 2, a) HPC suggests removing “if possible” (no get out clauses!) so that the text reads “**The thermal capacity of the proposed biomass technology and its make and model**”

Point 2, b) HPC suggests removing “preferably” so that the text reads, “**The type of fuel to be used is to be sustainably locally sourced**”; once again, “locally” should be defined. The

biomass plant near the ex-Pfizer headquarters in Sandwich, was, for example, burning wood arriving from Canada!

Policy DS29: Renewable and low carbon energy

HPC urges this policy to be strengthened.

In short, Local Plan policies regarding renewable energy are reactive rather than proactive and so far, do not reflect the expertise necessary to identify and mitigate new risks to the environment. They also do not require direct community benefit – at the parish level! Given the disruption of construction, ongoing maintenance of sites over decades, frequent loss and destruction of BMV land, loss of rural character to list some of the impact, and that foreign investment finances and benefits from dividend returns, **it is unacceptable that community benefit is not a mandatory part of planning applications.** This should be stated in the Local Plan.

Hoath Parish has been challenged by the unintended consequences of renewable energy production and development under agricultural permitted development rights (e.g., impact on highways, BMV land, biodiversity, landscape, wildlife, rural economy, resident wellbeing, conservation areas, listed buildings and heritage) and we have either had to deal with **retrospective planning** (a process which in rural areas tends towards confirmation of an unauthorised development) or, as a parish council, **we have had to raise objections during and after the event, usually without success.** These reactive situations continue as technology, climate change and biodiversity loss moves faster than any protections and guidance of Local Plan policies.

Definition and clarity are needed in DS29 introductory paragraphs (6.163 – 6.171), especially regarding **location**. Solar panels, for example, should be obligatory on every available roof on homes, new builds, car parks, industrial estates, large-scale shopping malls, on brownfield land (perhaps), **but should NOT be on BMV land** (reasons why not follow).

The challenge of the solar farm application in 2025 (intended to cover 250 acres of BMV farmland in the parish), highlighted the **randomness** behind choice of solar farm sites and the scale of solar proposals nationally, and locally. In our case, the solar proposal was part of a local landowner's development of the area as a renewable energy hub.

This landowner-led approach drives many solar farm projects nationally. This kind of development virtually requires residents to “do the right thing” and agree to any green energy project that lands in their neighbourhood in the interest of the “national good.” If they object, they are labelled Nimbys and ignored. The result is ongoing conflict between communities, decision makers and developers, especially regarding large industrial scale proposals in rural areas.

In fact, in most cases, the so-called Nimbys are drawing on local knowledge and identifying irreversible consequences, e.g., on biodiversity, which ultimately will impact the national picture. The Development Strategy Topic Paper states that none of the proposed 15

renewable energy sites submitted through CCC's Call for Sites was allocated in the draft 2042/43 Local Plan. Reasons for rejections included landscape, protected sites, heritage, ecology, transport and BMV agricultural land.

Surely the lesson from this is that **CCC should be able to direct proposals to locations where renewable energy projects will not impact BMV land and food security, local communities and homes, highways and heritage, and will protect DS21, DS22 and DS25.**

To ensure the preceding, HPC urges naming policies that cross reference with DS29:

DS11 (Rural economy), DS12 (Net zero carbon ready and water efficiency), DS13 (sustainable design), DS18 (Highways and parking), DS20 (Habitats of international importance), DS21 (Habitats and landscapes of national importance), DS22 (Habitats, landscapes and sites of local importance), DS23 (Flood risk), DS24 (Sustainable Drainage and Water Quality), DS25 (Supporting Biodiversity recovery), DS26 (Landscape character), DS27 (The Blean Woodland Complex), DM14 (Noise, Odour & Dust pollution), DM15 (Light pollution and dark skies), DM16 (Contamination and unstable land policy).

HPC also urges that DS29 should also have sufficient flexibility build in for the period of the Local Plan (2042/43) **to enable planning authorities to identify and adapt to technological advances and associated risks** (e.g., smaller and lighter solar panels, battery energy storage systems (BESS) and chemical fire risks of lithium batteries). They should also be prepared to call on new consultees who are experts in the new fields so that planning can be confident that the district has the capacity to manage any inherent risks. Hopefully, **the five year Local Plan** review outlined in SS7 will cover this.

(In HPC's case, we contacted Kent County fire service to find out how to handle a chemical fire and what resources were available for containing one. Research revealed takes 72 hours of constant dampening of the ground to control BESS chemical fires. Apparently, Kent only has two mega fire trucks and these would have difficulty in navigating the narrow rural lanes to access the solar farm site. Preparations also included contacting South East Water regarding access to water mains from the proposed solar farm site; it transpired the closest water mains would be in Hoath village. **HPC addressed these concerns, not the applicant, nor Planning.**)

Regarding the **final policy paragraph** dedicated to **End-of-Life Removal Schemes**, dismantling a solar farm, for example, given the equipment that will be required, risks **destroying any remaining soil biodiversity a second time, the first time being during construction and the laying of cables.** Such a scheme should also require identifying where, for example, solar panels will be recycled and how.

Please note: The ubiquitous description found at the end of solar farm applications that solar farms are **temporary** and that farming **can resume** once they have been dismantled is **pure PR rationalisation and mythmaking.** It aims to comfort but is in fact an utter misrepresentation. Farmers and sources such as Kent Wildlife Trust confirm that **soil needs constant care**; soil biodiversity needs constant feeding and fostering; soil cannot produce

food for many years after lying fallow for 20/30/40 years. **And with that in mind, Habitat restoration should be mandatory and conditions in achieving this diabolically tough!**

Heritage

Policy DS30: Historic environment and archaeology

HPC welcomes this policy's strong defence for the district's archaeology and historic environment, the need for Heritage Statements and Heritage Impact Assessments, and the significant support for Conservation areas and when available, applications should refer to Conservation Area Appraisals and Design Guides. This is of particular value as Hoath Parish has two conservation areas and some 20 listed buildings.

Imogen Morizet

On behalf of Hoath Parish Council

18th May 2026