

EXTRACT from Response from Hoath Parish Council to Draft Canterbury District Local Plan to 2045 (Regulation 18) Consultation 2023

16 January 2023

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

The Draft Nutrient Mitigation Strategy (21160-NUT-RP-02/C01)

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)**
1. 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**:

2. What mitigation has been planned for R27 drainage to avoid nutrient problems in the Sarre Penn and Wantsum/Stour River Catchment area?
3. What consideration has been given to fostering the Biodiversity Opportunity of this area?
4. 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).**

