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## Growth and Communities

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### BY EMAIL ONLY

29 April 2022

Dear Jennifer Heap,

### Re: Bridge Neighbourhood Plan - Regulation 14 Consultation

Thank you for consulting Kent County Council (KCC) on the Bridge Neighbourhood Plan, in accordance with the Neighbourhood Planning (General) Regulations 2012.

The County Council has reviewed the Neighbourhood Plan and for ease of reference, has provided comments structured under the chapter headings and policies used within the document.

### Objectives

#### **Objective A. Building a Strong, Competitive Economy & Ensuring the Vitality of the Village Centre**

##### *Policy A1*

Culture and Creative Economy: Alongside the consideration of the provision of vehicle parking and cycle parking for new business uses within Bridge, the County Council would also recommend consideration of the accessibility of new business uses by public transport to ensure sustainable connectivity of these sites for employees.

#### **Objective B. Promoting Sustainable Transport**

##### Policies B1 and B2

Highways and Transportation: The County Council, as Local Highway Authority, is supportive of Policies B1 and B2, along with the intentions of Objective B, which generally accord with the County Council's Local Transport Plan 4 ([LTP4](#)) and [Active Travel Strategy](#). KCC will

continue to work on the facilitation of a dedicated cycle route between Bridge and Canterbury through development opportunities at Mountfield Park and any other opportunities that may arise.

It is also recognised that Bridge Parish Council are actively engaged with KCC officers through the Highway Improvement Plan (HIP) process with regards to investigations about a 20mph speed limit within the village.

### **Objective C. To Maintain a Choice of High-Quality Homes with Good Design**

County Council Community and Infrastructure Services: The County Council, as key infrastructure and service provider, would welcome further engagement with Bridge Parish Council to discuss infrastructure requirements as any new development comes forward.

Culture and Creative Economy: In relation to paragraph 4.18, KCC would also welcome exploration as to how the new village hall could also be designed to accommodate creative and cultural activity.

#### *Policy C3*

Culture and Creative Economy: At Great Pett Farm, KCC recommends there could also be the exploration of the conversion of farm buildings for appropriate employment use, as well as residential housing.

### **Objective D. Promoting Healthy Communities**

Culture and Creative Economy: Alongside the provision of leisure and community facilities to serve the village, the County Council also recommends the provision of facilities that can accommodate creative and cultural activity, which can address social isolation and loneliness; anti-social behaviour by providing alternative activity; creative activity for young people and promote social cohesion. This would also support [Canterbury Local Plan](#) policies QL1 and QL3, contributing to quality of life. This could include a broad range of activity including touring theatre, craft classes, community choirs, knitting groups and should complement, without duplicating, the offer in Canterbury.

#### *Policy D1*

Public Rights of Way (PRoW): The County Council welcomes future engagement with the Parish Council to ensure that their interests are represented within the local planning policy frameworks. Whilst the County Council recognises that the maintenance of public footpaths is largely supported in paragraph 5.8, KCC is concerned that little further reference is made to the PRoW network. KCC would welcome future engagement with the Parish Council to ensure the Neighbourhood Plan makes that reference to the Rights of Way Improvement Plan (ROWIP). KCC is committed to working in partnership with the Parish Council to achieve the aims contained within the ROWIP and seeks successful joint partnership working to continue to support the delivery of improvements to the PRoW network. KCC would also draw attention to the ROWIP key themes 'Evolution of the network' - EN04, 'Rights with responsibilities' - RR01 and 'Efficient delivery' - ED02. Joint delivery of the strategic plan will

ensure significant benefits, as well as potential access to funding opportunities ('Efficient delivery' - ED07).

In respect of PRow and access to green space, the County Council requests that the Neighbourhood Plan emphasises the importance of new developments providing sustainable connectivity to services, facilities and public transport. The importance of that new provision integrating with the existing PRow network, and supporting the improvement of the existing network, must also be emphasised within this policy.

Development must deliver public realm that is safe, secure and of high amenity, encouraging the public to walk, cycle and spend time outside, which all deliver positive health and wellbeing outcomes. The County Council would recommend that the Neighbourhood Plan incorporates the need to involve KCC's Rights of Way and Access Service in the delivery of Active Travel opportunities.

Consideration should also be had for the quality of the environment which is equally as important as the construction of Active Travel routes.

### **Objective E. Meeting the Challenges of Climate Change and Flooding and Conserving and Enhancing the Natural Environment**

#### *Policy E1*

Sustainable Urban Drainage Systems (SuDS): The County Council, as Lead Local Flood Authority, welcomes the inclusion of the flood risk policy and reference to SuDS within the Neighbourhood Plan.

Biodiversity: The County Council would request that further consideration is given to biodiversity within the Neighbourhood Plan, specifically to enhancements to open space and promoting the inclusion of ecological enhancements within new developments.

### **Objective F. Conserving and Enhancing the Historic Environment**

Heritage Conservation: The County Council notes that paragraph 7.1 in the Neighbourhood Plan does not fully take account of the historic character of Bridge parish. The Kent Historic Environment Record lists more than 130 known heritage sites, buildings and discoveries in the parish. These include 43 listed buildings (not 63 as stated) of which 2 are Grade II\* and 41 Grade II. There are also at least 13 Locally Listed Buildings that do not have statutory protection, but which have been identified by Canterbury City Council as having a particular significance, and that contribute to local character. These include medieval buildings such as St Peter's Church, the Red Lion, White Horse and domestic buildings on the High Street together with a larger number of post-medieval buildings and an oast house. Together these buildings give Bridge a particularly historic character as reflected in the Conservation Areas that cover about half the parish.

## *Policy F1*

Heritage Conservation: It should be noted that successful development is that which is sympathetic to both the character and the heritage of the area in which it is built. In addition to complying with the Village Design Statement, the policy should require that new development enhances the character and heritage of Bridge. Existing historic tracks and lanes should be respected, where possible, to help new development integrate within the historic grain of the existing buildings and landscape.

## *Paragraph 7.5*

In addition to its built heritage, KCC notes that Bridge has a very significant archaeological heritage dating from prehistoric to the 20<sup>th</sup> century. Although there is some potential for Palaeolithic archaeology in the parish, the most striking prehistoric features are likely to be found in the extensive cropmarks that can be seen from aerial photography across Bridge. Alongside the road, to both north and south of the village, lie extensive archaeological remains. In the north, these include a set of trackways and enclosures found along Station Road. These are mostly undated, but many will be of prehistoric origin.

As the text rightly notes, the main archaeological feature in Bridge is the Canterbury to Dover Roman road, Watling Street, that passes along the High Street through the middle of the village. Archaeological remains associated with the use of the road may lie alongside and to the south of the village, Bourne Park. Although it is not covered by the Neighbourhood Plan, this park contains numerous cropmarks associated with Bourne Park Roman villa and some of these extend into the Neighbourhood Plan area. The most significant archaeological site in the Plan area is the Scheduled Monument of the Saxon Barrow Cemetery at Hanging Hill. In 1771, there were estimated to be more than 100 barrows on Hanging Hill. Most have now been ploughed away, but archaeological remains will still survive within the Scheduled area and likely outside it too. To the east of Bridge Hill, between the road and the A2, cropmarks associated with Second World War practice trenches and perhaps earlier features can also still be seen.

The final feature of note in the Neighbourhood Plan area is the dismantled railway that passes through the west of the Parish.

Moreover, this rich and diverse heritage has the potential to enhance life in Bridge for the duration of the Neighbourhood Plan in a number of ways. The County Council would request that clarification is provided regarding whether the Conservation Areas in Bridge are supported by Conservation Area Appraisals. If they are not, the community could help with this process by gathering information about the historic structures and layout of the Conservation Areas. This would also provide an opportunity to review the extent of the Conservation Areas and identify ways in which their character can be enhanced. KCC also recommends that the dismantled railway could be used as a community resource for walking trails and to provide views of the landscape. This would allow this heritage asset to contribute to the health and well-being of local people. The archaeological heritage of the Neighbourhood Plan area does also lend itself to a range of community activities - such as study groups, trails and interpretation. This would help to recognise the historic and landscape context of the village and thereby help integrate any new development into its

surroundings more effectively. This could include a historic landscape characterisation of the Parish which would help identify surviving historic features such as hedgerows, assarts, field boundaries, tracks and lanes.

Historic England has produced [guidance](#) for communities developing Neighbourhood Plans. Consideration of this guidance would help to assess the usefulness of various tools that have proved valuable to those developing Neighbourhood Plans. In particular, historic characterisation, Conservation Area Appraisals, design policies for local areas and the identification of local heritage assets.

### **Projects allied to the Policies contained within this Neighbourhood Plan**

#### **Objective A**

##### *Project A1*

Culture and Creative Economy: KCC recommends that consideration could also be had for a physical hub, which could provide essential services (flexible desk space, access to technology and equipment), and a place for workers to meet and collaborate to support freelancers and homeworkers.

##### *Project A2*

Culture and Creative Economy: To support the presence of the Post Office within the village, the potential to co-locate with other services or businesses could be explored.

#### **Objective D**

##### *Project D1*

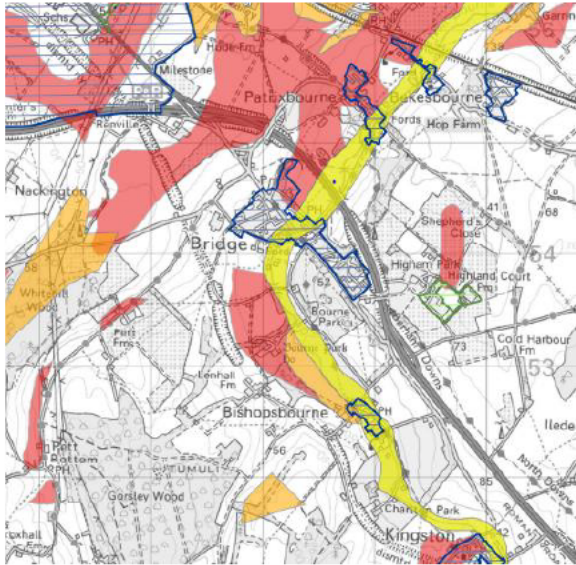
Culture and Creative Economy: The County Council would also recommend that cultural facilities are also maintained to serve the village.

### **Canterbury District Local Plan 2017 Policies**

#### *Chapter 2 – Housing*

Minerals and Waste: The County Council, as Minerals and Waste Planning Authority, can confirm that the Neighbourhood Plan does not have within it, nor is it within, 250 metres of any safeguarded mineral facility or waste facility. Therefore, the Neighbourhood Plan does not need to be considered against any of the minerals and waste safeguarding exemption provisions of Policy DM 8: Safeguarding Minerals Management, Transportation, Production and Waste Management Facilities of the adopted [Kent Minerals and Waste Local Plan 2013-30](#).

However, the Neighbourhood Plan area is within an area where mineral deposits are identified as safeguarded and form part of a Mineral Safeguarding Area (MSA). KCC would draw attention to the MSA Proposals Map for the Canterbury City Council area below:

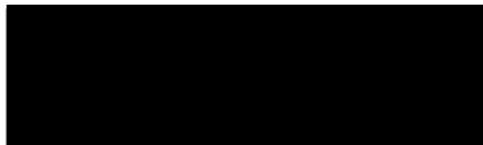


- River Terrace Deposits
- Sub - Alluvial River Terrace Deposits
- Brickearth (Other Areas) - Ashford, Canterbury, Dover, Shepway

KCC notes that the Neighbourhood Plan proposes further development in alignment with the policies and allocations in Chapter 2 of the Canterbury District Local Plan 2017. Therefore, it is recommended that the Neighbourhood Plan makes reference to the requirement for a Mineral Assessment (MA) for any planning applications that are submitted on any of the allocations of the adopted Local Plan in the Neighbourhood Plan area. This is necessary where MAs have not been completed during the allocation's formulation in the 2017 Local Plan for the Canterbury City Council area.

KCC would welcome continued engagement as the Neighbourhood Plan progresses. If you require any further information or clarification on any matters raised above, please do not hesitate to contact me.

Yours sincerely,



**Stephanie Holt-Castle**  
 Director for Growth and Communities