



Canterbury City Council
Council Offices
Military Road
Canterbury
CT1 1YW

Growth and Communities

Invicta House
County Hall
Maidstone
Kent
ME14 1XX

Phone: 03000 423203
Ask for: Alessandra Sartori
Email: alessandra.sartori@kent.gov.uk

BY EMAIL ONLY

26 June 2023

Dear Sir/Madam,

Re: Bridge Neighbourhood Plan (2022-2037) Regulation 16 Consultation

Thank you for consulting Kent County Council (the County Council) 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.

Objective A – Building a Strong, Competitive Economy & Ensuring the Vitality of the Village Centre

Policy A1

Highways and Transportation: The County Council, as Local Highway Authority, supports this policy, particularly the provision of vehicle and cycle parking for new business units within the built-up area boundary of the village. The County Council is pleased to note the associated text in paragraph 2.2 which clarifies that this should accord with the standards set out in the Canterbury Local Plan and by the County Council. The intentions of Objective A to support employment opportunities, small-scale business development, and effective internet networks are also welcomed.

Objective B – Promoting Sustainable Transport

Highways and Transportation: The County Council is supportive of this objective as it generally aligns with the County Council's [Local Transport Plan 4](#) and [Active Travel Strategy](#), and promotes the provision of a cycle route between Bridge and Canterbury. It is anticipated that much of this route will be delivered by the development proposals at Land North and South of New Dover Road (Mountfield Park, South Canterbury, Planning Application Reference: CA/16/00600), and that other opportunities to expand the local cycle network will be explored through further development coming forward.

The Neighbourhood Plan mentions car parking problems and congestion in the village; it also suggests seeking to increase the amount of parking spaces in the High Street. As Local Highway Authority, the County Council considers that this may be at odds with the aim of reducing congestion, as referenced in paragraph 2.5, with further on-street parking likely to reduce the ability to maintain free flow traffic. Paragraph 3.7 discusses the shortage of available parking and compelling employers to encourage staff to use alternative parking, which supports Objective A rather than Objective B. The Neighbourhood Plan could consider the introduction of limited waiting within the on-street parking lengths to help manage this.

Policy B1

Highways and Transportation: The County Council supports this policy as it promotes sustainable transport in new developments through the local cycle network and pedestrian routes.

Policy B2

Highways and Transportation: This policy is in alignment with Canterbury City Council and the County Council parking standards, and is therefore welcomed.

Objective C – To Maintain a Choice of High-Quality Homes with Good Design

Policy C1

Highways and Transportation: The County Council is supportive of this policy, particularly paragraph (b) which describes careful consideration of the scale, design and materials of the public realm (highways, footways, open space and landscape). This will ensure quality design and placemaking in new developments.

Policy C2

Highways and Transportation: The County Council notes that the appendices were not initially available at the time the Neighbourhood Plan was submitted, although they have since been made available online. The principles outlined in this policy are supported by the County Council, however, the drawings provided in Appendix E should be taken as an indicative layout only, as it is appreciated that detail will be subject to planning approval. It is noted that the drawing shows the housing development gated to restrict public access. This

would prevent the development from being adopted by the Local Highway Authority and will require a turning head to be provided within the adoptable highway limits. The County Council would therefore recommend that the development is not gated.

The abbreviation for 'Strategic Environmental Assessment' has been defined in paragraph 4.21, however, this has not been provided in the Glossary at the end of the document. The County Council would therefore recommend that this is included to provide clarity to all those reading the document.

Policy C3

Sustainable Urban Drainage Systems (SuDS): The County Council, as Lead Local Flood Authority, is supportive of Policy C3 but would note that it is only partially published. The last section of content within the text box cannot be viewed in its entirety and the Neighbourhood Planning Committee is advised to address this.

Objective D - Promoting Healthy Communities

Public Rights of Way (PRoW): As a general statement, the County Council is keen to ensure that its interests are represented within the local policy frameworks of the parishes/towns in Kent. The County Council is committed to working in partnership with the Neighbourhood Planning Committee to achieve the aims contained within the [KCC Rights of Way Improvement Plan](#) (ROWIP).

It is disappointing that the Neighbourhood Plan makes little reference to the PRoW network and no reference to the KCC ROWIP, further to the County Council's previous response to the Regulation 14 consultation. The Neighbourhood Planning Committee is strongly advised to ensure that reference to the ROWIP is included to enable successful joint partnership working to continue, which can support the delivery of improvements to the PRoW network. The County Council 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).

A recent example of such funding opportunities is the Highland Court Farm Chapel Down expansion (Planning Application Reference: CA/22/02055) – the County Council has secured Section 106 funding for PRoW network improvements to the extensive Bridleway network of the area which will result in improved off road walking, cycling and equestrian routes for both active travel and leisure purposes. The connections to and from Bridge and the industrial area as well as towards Bokesbourne station will be improved. These works will complement on-site improvements to be completed by the developer during construction.

Funding through developer contributions for off-site network improvements has also been secured through the development at Land North and South of New Dover Road (Mountfield Park, South Canterbury, Planning Application Reference: CA/16/00600) for routes into Canterbury, with a new bridleway being created for active travel and leisure use.

The County Council would encourage that reference is made to the PRow network in Objective D to ensure that opportunities through development can be maximised for PRow.

The County Council would recommend that the Neighbourhood Plan includes a PRow Definitive Map, which is available upon request¹.

Objective E - Meeting the Challenges of Climate Change and Flooding and Conserving and Enhancing the Natural Environment

SuDS: The County Council acknowledges the intention of Objective E to minimise vulnerability and provide resilience, and the subsequent statement made in paragraph 6.5 regarding the Neighbourhood Plan area: *“The risk identified is so great that no development will be supported in Flood Zone 3.”* The Neighbourhood Planning Committee may wish to consider this with regard to the requirements of the Exception and Sequential Tests as set out in the National Planning Policy Framework, which (subject to passing these tests) permits development in Flood Zone 3. The County Council would therefore advise that the wording of this policy is amended for consistency with national planning policy.

Objective F - Conserving and Enhancing the Historic Environment

Heritage Conservation: In respect of paragraph 7.1, the text understates 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 two are Grade II* and 41 Grade II. There are also at least thirteen Locally Listed Buildings that do not have statutory protection, but which have been identified by Canterbury City Council as having a particular significance and 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.

In respect of paragraph 7.5, in addition to its built heritage, Bridge has a very significant archaeological heritage dating from prehistory to the 20th 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 alongside the road, to both north and south of the village. 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. Among these features was found a late iron age helmet that had been used as a cremation vessel.

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

¹ prow@kent.gov.uk

the south of the village. Bourne Park, though not covered by the Neighbourhood Plan, 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 Neighbourhood 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 probably 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. These should all be recognised in the Neighbourhood Plan.

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

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. It is not clear whether the Conservation Areas in Bridge are supported by Conservation Area Appraisals. If not, then 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. 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 lends itself to a range of community activities such as study groups, trails and interpretation. This would help put the village in its historic and landscape context and therefore 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 and the County Council would advise that this is taken into consideration by the Neighbourhood Planning Committee to help assess the usefulness of various tools that have proved valuable to those developing Neighbourhood Plans. In particular:

- Historic characterisation - this helps provide a general context for the policies of the Neighbourhood Plan, provide evidence for more detailed landscape, environment and heritage policies, and provide a means to evaluate potential development sites/locations in Bridge.
- Conservation Area Appraisals - a Conservation Area Appraisal is an objective analysis of the elements which together define the area's special architectural or historic interest.
- Design Policies for local areas - design policies can provide robust design principles for applicants and decision makers to guide proposals in each area. Matters covered include the suitability of particular materials, set-back of buildings from road frontages, boundary treatments and the desired scale and form of new buildings. Similar requirements can be set out for individual site allocations.
- Identification of local heritage assets - plan developers can focus on local heritage assets and identify certain buildings, boundary walls and other structures as being

worthy of protection as non-designated heritage assets due to the important contribution that they make to the distinctive local character of the parish. Canterbury City Council has a Local List of heritage assets, and it would be advisable to take advantage of this.

Policy F1

Heritage Conservation: The County Council notes that successful development 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 could require that new development enhances the character and heritage of Bridge, and that existing historic tracks and lanes should be respected where possible to help the new development work with the historic grain of the existing buildings and landscape.

Projects allied to the Policies contained within this Neighbourhood Plan

Projects B1 to B5

Highways and Transportation: The County Council supports the projects listed, which aim to promote safe and sustainable transport, and improve air quality.

Additional Comments

Highways and Transportation: The County Council notes that the document makes reference to the adopted [Canterbury Local Plan](#) (2017-2031), and quotes the policies within that to be cross-referenced to those proposed in this Neighbourhood Plan. Whilst the document also acknowledges that Canterbury City Council will be updating the Local Plan in due course, it may be appropriate for the Neighbourhood Plan to acknowledge this and give weight to the emerging Local Plan.

As previously mentioned, Appendices A to F were not initially available to view at the time that the Neighbourhood Plan was submitted. It has not been possible, therefore, to fully cross reference the information purported to be contained within these appendices.

Minerals and Waste: The County Council, as Minerals and Waste Planning Authority, recognises that reference has not been made to the safeguarded land-won minerals (River Terrace Deposits, Sub-Alluvial River Terrace Deposits and Brickearth) in the Neighbourhood Plan area. Therefore, the County Council's previous comments made in respect of the Regulation 14 consultation remain applicable (Appendix A).

The County Council notes that allocated development sites are only exempt from mineral safeguarding considerations if this has been successfully addressed in the formulation of the adopted Canterbury Local Plan. As no sites are considered to be exempt, a Mineral Safeguarding Assessment is required for the relevant development sites in the Neighbourhood Plan area that are coincident with safeguarded minerals. This is a policy

requirement of the adopted Development Plan for the area, including the adopted [Kent Minerals and Waste Local Plan](#) 2013-2030.

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

Encs:

Appendix A: 29.04.22 KCC Response to Bridge Neighbourhood Plan Regulation 14 Consultation