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Report on Bridge Neighbourhood Development Plan 2022 - 2037

An Examination undertaken for Canterbury City Council with the support of Bridge Parish Council on the Regulation 15 Submission version of the Plan.

Independent Examiner: Derek Stebbing BA (Hons) DipEP MRTPI

Date of Report: 17 November 2023

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Main Findings - Executive Summary

From my examination of the Bridge Neighbourhood Development Plan (the Plan) and its supporting documentation including the representations made, I have concluded that subject to the modifications set out in this report, the Plan meets the Basic Conditions.

I have also concluded that:

- the Plan has been prepared and submitted for examination by a qualifying body – the Bridge Parish Council (the Parish Council);
- the Plan has been prepared for an area properly designated – the Bridge Neighbourhood Area, as identified on the map at page 5 of the Plan;
- the Plan specifies the period to which it is to take effect – from 2022 to 2037; and,
- the policies relate to the development and use of land for a designated neighbourhood plan area.

I recommend that the Plan, once modified, proceeds to referendum on the basis that it has met all the relevant legal requirements.

I have considered whether the referendum area should extend beyond the designated area to which the Plan relates and have concluded that it should not.

1. Introduction and Background

Bridge Neighbourhood Development Plan 2022 - 2037

- 1.1 The Parish of Bridge, with the village of Bridge as its main settlement, lies approximately 5 kilometres to the south-east of the City of Canterbury, within an Area of Outstanding Natural Beauty (AONB). It is separated from the edge of the Canterbury urban area by an area of open countryside extending to approximately 1.6 kilometres. Bridge sits within the Nailbourne Valley, and the River Nailbourne, which is a chalk bourne running through the centre of the village, is a tributary to the River Stour.
- 1.2 The Parish area had a population of 1,576 persons at the 2011 Census within 645 households. The Parish has a significantly higher than average proportion of residents aged 65 years and over (30.4% compared to the national average of 16.3%). 23.8% of the households are of single older persons. Conversely, Bridge has a lower proportion (51.6%) of working age adults compared to the national average (64.7%).
- 1.3 Bridge retains the charm of a rural village, very largely due to its setting within the AONB, which surrounds the village, and bordering the Bourne Park and the Bifrons Park Conservation Areas to the west and east of the village respectively. These Conservation Areas include two of the

three large country estates (Bourne Park, Higham Park and Bifrons Park) that are within the Parish. Much of the village itself is within the Bridge Conservation Area, which contains many Grade II Listed Buildings. A significant proportion of the agricultural land and woodland within the Parish is situated within the three Conservation Areas.

- 1.4 Until 1976, Bridge was on the main London to Dover Road (the A2), which was previously a major Roman road (Watling Street). The village by-pass was built in 1976, but the linear form of the village reflects its location along the historic road. The village name 'Bridge' is believed to be derived from the Roman period when a bridge over River Nailbourne was used as a bridging point for the Roman road.
- 1.5 For a village of its size, Bridge has a good range of community facilities and services, including a primary school, a modern health centre, local shops and public houses. Four local bus services provide links to Canterbury, Dover, Folkestone and Aylesham. Students of secondary-school age travel mainly to secondary schools in Canterbury.
- 1.6 The village has a thriving community life with a wide range of sporting and social groups based in the area. The village's population is projected to increase during the next 15 years, albeit slowly, and the City Council has projected an indicative figure of 168 new housing units for the Parish over the Plan period for this Neighbourhood Plan.

The Independent Examiner

- 1.7 As the Plan has now reached the examination stage, I have been appointed as the examiner of the Plan by Canterbury City Council (the City Council/CCC), with the agreement of the Parish Council.
- 1.8 I am a chartered town planner, with over 45 years of experience in planning. I have worked in both the public and private sectors and have experience of examining both local plans and neighbourhood plans. I have also served on a Government working group considering measures to improve the local plan system and undertaken peer reviews on behalf of the Planning Advisory Service. I therefore have the appropriate qualifications and experience to carry out this independent examination.
- 1.9 I am independent of the qualifying body and the local authority and do not have an interest in any of the land that may be affected by the Plan.

The Scope of the Examination

- 1.10 As the independent examiner, I am required to produce this report and recommend either:
 - (a) that the neighbourhood plan is submitted to a referendum without changes; or

(b) that modifications are made and that the modified neighbourhood plan is submitted to a referendum; or

(c) that the neighbourhood plan does not proceed to a referendum on the basis that it does not meet the necessary legal requirements.

1.11 The scope of the examination is set out in Paragraph 8(1) of Schedule 4B to the Town and Country Planning Act 1990 (as amended) ('the 1990 Act'). The examiner must consider:

- Whether the plan meets the Basic Conditions.
- Whether the plan complies with provisions under s.38A and s.38B of the Planning and Compulsory Purchase Act 2004 (as amended) ('the 2004 Act'). These are:
 - it has been prepared and submitted for examination by a qualifying body, for an area that has been properly designated by the local planning authority;
 - it sets out policies in relation to the development and use of land;
 - it specifies the period during which it has effect;
 - it does not include provisions and policies for 'excluded development'; and
 - it is the only neighbourhood plan for the area and does not relate to land outside the designated neighbourhood area.
- Whether the referendum boundary should be extended beyond the designated area, should the plan proceed to referendum.
- Such matters as prescribed in the Neighbourhood Planning (General) Regulations 2012 (as amended) ('the 2012 Regulations').

1.12 I have considered only matters that fall within Paragraph 8(1) of Schedule 4B to the 1990 Act, with one exception. That is the requirement that the Plan is compatible with the Human Rights Convention.

The Basic Conditions

1.13 The 'Basic Conditions' are set out in Paragraph 8(2) of Schedule 4B to the 1990 Act. In order to meet the Basic Conditions, the neighbourhood plan must:

- have regard to national policies and advice contained in guidance issued by the Secretary of State;
- contribute to the achievement of sustainable development;

- be in general conformity with the strategic policies of the development plan for the area;
- be compatible with and not breach European Union (EU) obligations (under retained EU law)¹; and
- meet prescribed conditions and comply with prescribed matters.

1.14 Regulation 32 of the 2012 Regulations prescribes a further Basic Condition for a neighbourhood plan. This requires that the making of the Neighbourhood Plan does not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017 ('the Habitats Regulations').²

2. Approach to the Examination

Planning Policy Context

- 2.1 The Development Plan for this part of Canterbury City Council, not including documents relating to excluded minerals and waste development, consists of the Canterbury District Local Plan (CDLP), adopted July 2017, which covers the period from 2011 to 2031. CCC is presently undertaking the preparation of a new Local Plan, which will cover the period from 2020 to 2045. Two Regulation 18 consultations have been undertaken on the emerging new Local Plan between June-August 2021 and between October 2022-January 2023. The Council's latest Local Development Scheme (LDS) (October 2022) indicates that Regulation 19 pre-submission consultation would take place in September 2023, with the submission of the draft Plan to the Secretary of State for independent examination scheduled for October 2023. Formal adoption is anticipated in September 2024. The fourth of my questions (see paragraph 2.7 below) relates to the progress of the new Local Plan.
- 2.2 The adopted Local Plan contains a suite of five strategic policies (Policies SP1-SP5) supported by a series of topic-based policies. With regard to the Bridge Neighbourhood Area, Policy SP4 (Strategic approach to location of development) states, inter alia, that "*Provision of new housing that is of a size, design, scale, character and location appropriate to the character and built form of the rural service centre of Sturry and the local centres of Barham, Blean, **Bridge**, Chartham, Hersden and Littlebourne will be supported provided that such proposals are not in conflict with other local plan policies relating to transport, environmental and flood zone protection and design, and those of the Kent Downs AONB Management Plan, where applicable*". Within the Local Plan, Bridge is designated as a Local Centre

¹ The existing body of environmental regulation is retained in UK law.

² This revised Basic Condition came into force on 28 December 2018 through the Conservation of Habitats and Species and Planning (Various Amendments) (England and Wales) Regulations 2018.

in the Rural Settlement Hierarchy and as a Larger Local Village Centre in the Retail Hierarchy. Policies HD1 (Housing Allocations) and EMP1 (Employment Land Allocations) do not identify any housing or employment land allocation sites in the Neighbourhood Area. The lack of a Green Corridor between Bridge and Canterbury is identified in the Local Plan as one of the key gaps in the green infrastructure network for the rural areas of the District.

- 2.3 The Basic Conditions Statement (at Sections 2 and 3) provides an assessment of how the policies proposed in the Plan have regard to national policy and are in general conformity with the relevant strategic policies in the adopted CDLP. Having been adopted in 2017, the CDLP provides a relatively current strategic planning context for the Neighbourhood Plan, and this has enabled the Neighbourhood Plan and its policies to be prepared.
- 2.4 Planning policy for England is set out principally in the National Planning Policy Framework (NPPF). It is accompanied by the Planning Practice Guidance (PPG) which offers guidance on how this policy should be implemented. All references in this report are to the latest iteration of the NPPF³ and the accompanying PPG.

Submitted Documents

- 2.5 I have considered all policy, guidance and other reference documents I consider relevant to the examination, including those submitted which comprise:
- the draft Bridge Neighbourhood Development Plan 2022-2037 Submission Version (undated) and its seven Appendices (A-G)⁴;
 - the Strategic Environmental Assessment (SEA) Environmental Report (AECOM) (July 2020);
 - the Habitats Regulations Assessment (HRA) Report (AECOM) (March 2023);
 - the Basic Conditions Statement (undated);
 - the Consultation Statement (undated);
 - all the representations that have been made in accordance with the Regulation 16 consultation;⁵ and
 - the request for additional clarification and information sought in my letter of 22 August 2023 to CCC and the Parish Council and their responses dated 1 September 2023 and 12 & 15 September 2023 respectively.⁶

³ A new version of the NPPF was published during the examination on 5 September 2023. It sets out focused revisions (to the previously published version of 20 July 2021) only to the extent that it updates national planning policy for onshore wind development. As such, all references in this report read across to the latest 5 September 2023 version.

⁴ There is some confusion around the Appendices – see paragraph 4.61 below.

⁵ View at: <https://news.canterbury.gov.uk/consultations/bridge-neighbourhood-plan/>

⁶ View at: <https://drive.google.com/drive/folders/1cVSiIwzJP3Der2NvJdSSsOaEt9ivePxq>

Supporting Documents

2.6 I have also considered the various supporting documents to the submission Plan, including:

- Landscape and Visual Impact Assessment (LVIA) (December 2021) (Eleanor Tretfield Landscape Architects Ltd);
- Rural Community Profile for Bridge (Parish) (October 2013) (Action with Communities in Rural England) (ACRE);
- Bridge Village Design Statement (2013) (which is also described in the draft Plan as the 'Bridge Architectural Legacy Statement'); and
- Bridge Housing Needs Survey (Action with Communities in Rural Kent) (July 2017).

Examiner Questions

2.7 Following my appointment as the independent examiner and my initial review of the draft Plan, its supporting documents and representations made at the Regulation 16 stage, I wrote to the City Council and the Parish Council on 22 August 2023 seeking further clarification and information on four matters contained in the submission Plan, as follows:

1. Firstly, with regard to Policy B2 in the draft Plan, it, inter alia, states that "*Development applications that would significantly increase the parking problems in Bridge will not be supported*". I noted that 'Parking problems', including on-street car parking and any relevant enforcement, are not a matter that can be directly resolved by land-use planning policies, as it is a matter covered by other legislation, normally the Highways Act and accompanying regulations. It is not a matter that can be addressed by the local planning authority.

I further noted that the second part of Policy B2, as presently drafted, is therefore defective and I invited the Qualifying Body to consider whether the Policy text should be reviewed to focus on the provision of appropriate car parking provision to align with the adopted standards of Kent County Council and the City Council. I also considered that this Policy, or Policy B1, should make reference to the appropriate provision of bicycle and powered two-wheeler (PTW) parking, again to align with the adopted standards. I invited the Qualifying Body to provide me with a note containing any suggested revisions to the text of Policy B2, and if appropriate Policy B1.

2. Secondly, with regard to Policy C2, paragraph 4.15 and Appendix E (Pages 15, 16 and 38 in the draft Plan), I commented that, from everything that I had read, including the representations made to the draft Plan, I considered that the proposals by Cantley Ltd. described as 'Bridge Fields' are, at this stage, still at an illustrative stage and that no pre-application discussions on the development proposals have yet commenced with the City Council.

As such, the illustrative drawings included at Appendix E could not constitute a formal Site Allocation plan within the Plan to accompany Policy C2. Such a Site Allocation plan should clearly define the boundaries of the site on an Ordnance Survey (OS) base and at an appropriate scale, which is probably 1:1250 in this case, to enable users of the Plan to clearly identify the land so defined within the Policy. The Site Allocation plan should not contain the type of illustrative material shown on the drawings at Appendix E.

Furthermore, I was concerned that Appendix E contains information which is of a possible contractual nature between the Parish Council and Cantley Ltd./Woodchurch Properties and which should not form part of a land use development plan and its policies. However, matters that may be the subject of any necessary planning obligations between the City Council and the developer, as part of any planning permission that may be granted, can be identified. I am of the view at the present time that Appendix E should be removed from the draft Plan, although it can form part of the supporting material to the Plan. In that context, other references in the Plan to Appendix E, e.g. at Policy E3, would need to be removed.

I also noted an inconsistency between the stated housing capacity of the site at Policy C2 and Appendix E (47 dwellings) and at paragraphs 4.23 and 5.21 of the SEA Environmental Report (a maximum of 40 dwellings), and I sought clarification from the Qualifying Body on that point.

I was also mindful that Paragraph 177 of the NPPF requires consideration of the exceptional circumstances that will need to be assessed as part of any planning application for major development within an AONB.

I concluded that, as drafted, I considered Policy C2 to be flawed in several respects, as follows:

- it fails to identify that the site is within the Kent Downs AONB and the Bifrons Park Conservation Area and does not identify the mitigations that will be necessary to justify development of the scale proposed (47 dwellings and a new village hall of some 500-600 sq.m.) or any reference to other relevant Policies in the draft Plan that will need to be taken into consideration;
- it fails to identify the size of the site which (from the SEA Environmental Report at paragraph 4.18) I believed to be 7.44 ha;
- it fails to specify with sufficient detail the full extent of the proposed development at the site, including the housing mix and the number of affordable housing units;

- it fails to identify the mitigations regarding Flood Risk, and I noted that approximately 35% of the site is within Flood Zone 3 and a further 10% is within Flood Zone 2. I considered that any development proposals will need to be accompanied by a Flood Risk Assessment and Drainage Strategy, which will need the approval of the Environment Agency and the Lead Local Flood Authority (LLFA). (I also wished to establish beyond any doubt that there is no conflict between Policy C2 and Policy E1 in the draft Plan regarding the proposed development of the site);
- it fails to identify the proposed vehicular and pedestrian access arrangements to the developments proposed, and the potential 'new school access' shown on one of the drawings at Appendix E;
- it fails to identify the need to safeguard existing mature trees within the site; and
- finally, I noted that the drawings at Appendix E show the provision of a car parking area with 30 spaces for school staff, but which is not specifically referenced within Policy C2, within its supporting text or within Appendix E. I sought to understand the justification for this specific car parking provision, which is additional to the 84 car parking spaces, and described at Appendix E as being "for school and village hall".

In view of those matters of concern, I requested that the Qualifying Body provide me with a full note addressing each of the points, including suggested revisions to the text of Policy C2 and paragraphs 4.15-4.21, that I may consider as proposed modifications to the Plan.

I also requested a draft Site Allocation plan, which will be suitable for inclusion in the draft Plan linked to Policy C2, noting that this should simply define the boundaries of the site on an Ordnance Survey base and at an appropriate scale, titled appropriately including the address of the site.

3. Thirdly, with regard to Policies D1 and E4 (at Pages 20 and 24), the map of Important Local Green Spaces (at Page 25) and accompanying List of Sites (at Page 26), I noted that in relation to the proposed designation of Site Nos. 1-7 as Local Green Spaces (LGS), I would require inset maps on an Ordnance Survey base, at an appropriate scale, which is likely to be at 1:1250 or 1:2500 (depending upon the varying sizes of the sites), clearly defining the boundaries of each of the seven sites and suitable for inclusion in the draft Plan to enable users of the Plan to clearly identify the land so designated by the Policy. I therefore requested that the Qualifying Body provide a set of plans to meet this requirement, which I can consider for inclusion in the Plan as a proposed modification.

I also sought further clarification, beyond that set out on page 26, to support the proposed designation of the seven proposed LGSs in accordance with the specific three criteria set out at Paragraph 102 of the NPPF, and I requested the Qualifying Body provide me with a note setting out the available supporting justification for each site.

Additionally, I sought confirmation that the Qualifying Body had consulted all owners of the proposed Local Green Spaces on the proposed designation during the course of the Plan's preparation and given the opportunity to make representations concerning the designation.⁷

Finally, I confirmed that I would visit each of the sites during the course of my site visit.

4. With regard to the preparation of the draft Canterbury District Local Plan 2020-2045, I sought confirmation from the City Council that it is progressing in accordance with the timetable contained at Appendix 1 to the City Council's most recent Local Development Scheme (LDS), which envisages the submission of the draft Plan for examination in October 2023?

2.8 In response to my letter of 22 August 2023, the City Council and the Parish Council provided me with responses to the questions listed above on 1 September 2023 and 12 & 15 September 2023 respectively. I have taken full account of the additional information contained in these responses as part of my assessment of the draft Plan, alongside the documents listed at paragraphs 2.5 and 2.6 above.

2.9 To avoid unnecessary repetition in subsequent sections of this report, I refer to the questions and to the responses from the City Council and the Parish Council by their relevant number, e.g. Question No. 1. Readers should refer to paragraph 2.7 above, and to the response documents from each Council for the full text of questions and responses.

Site Visit

2.10 I made an unaccompanied site visit to the Neighbourhood Plan Area on 16 September 2023 to familiarise myself with it and visit relevant sites and areas referenced in the Plan, evidential documents and representations.

Written Representations with or without Public Hearing

2.11 This examination has been dealt with by written representations. I considered hearing sessions to be unnecessary as the consultation responses clearly articulated the objections and comments regarding the

⁷ PPG Reference ID: 37-019-20140306.

Plan and presented arguments for and against the Plan's suitability to proceed to a referendum. I am satisfied that the material supplied is sufficiently comprehensive for me to be able to deal with the matters raised under the written representations procedure, and that there was not a requirement to convene a public hearing as part of this examination. In all cases, the information provided has enabled me to reach a conclusion on the matters concerned.

Modifications

2.12 Where necessary, I have recommended modifications to the Plan (**PMs**) in this report in order that it meets the Basic Conditions and other legal requirements. For ease of reference, I have listed these modifications in full in the Appendix to this report.

3. Procedural Compliance and Human Rights

Qualifying Body and Neighbourhood Plan Area

- 3.1 The Plan has been prepared and submitted for examination by Bridge Parish Council. An application to the City Council for the Parished area of Bridge to be designated a neighbourhood planning area was made on 11 March 2019 and was approved by the City Council on 17 April 2019⁸, following an earlier designation on 25 July 2013. The present designation now covers the extended administrative Parish boundary (as approved by the City Council on 18 October 2018).
- 3.2 The designated Neighbourhood Area comprises the whole of the Parished area of Bridge. The designated area is shown on the map at page 5 in the submission Plan. The Bridge Neighbourhood Plan is the only Neighbourhood Plan in the designated area.
- 3.3 Bridge Parish Council is the Qualifying Body for the preparation of the Plan. The preparation of the Plan has been led by a Neighbourhood Plan Committee, which was established in March 2017, with up to 12 members comprising Parish Councillors, a number of local residents and other interested members of the community.

Plan Period

- 3.4 The draft Plan specifies (on the front cover) the period to which it is to take effect, which is the period from 2022 to 2037. The Plan period encompasses the remaining part of the Plan period for the adopted CDLP (up to 2031) and part of the Plan period for the emerging new CDLP (up

⁸ View at:

<https://www.canterbury.gov.uk/planning-and-building/neighbourhood-planning>

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to 2037). In response to Question No. 4, the City Council responded on 1 September 2023 stating that the current published LDS is now out of date, and that a revised LDS will be published in due course with the current expectation being that a revised Regulation 18 draft CDLP will be published for consultation in Spring 2024. I therefore make a recommendation and proposed modification **PM17** with regard to the future review of the Plan in order to take account of the emerging new CDLP.

Neighbourhood Plan Preparation and Consultation

- 3.5 The Consultation Statement and its Timeline of Activities and Events sets out a comprehensive record of the Plan's preparation and its associated engagement and consultation activity between February 2019 and March 2023. The decision to undertake the preparation of this Neighbourhood Plan was taken by the Parish Council in early 2019, following the preparation and examination of an earlier Plan which did not progress to a referendum and also following the designation of the enlarged Neighbourhood Area (see paragraph 3.1 above). The Neighbourhood Plan Committee was then constituted as a sub-committee of the Parish Council, in order to undertake the preparation of the draft Plan. Preliminary engagement work on the new Plan was undertaken during 2019 with residents and stakeholders, through meetings, the distribution of a leaflet, the launch of a new website and use of social media outlets.
- 3.6 The preparation of the Plan and the associated community engagement and consultation has involved four main stages, as follows:
- Stage 1: Initial work, formation of the Neighbourhood Plan Committee, community engagement and two consultation workshops for residents and businesses and a Call for Sites (Spring 2019 - Autumn 2019).
 - Stage 2: Preparation of evidence base studies including SEA and HRA assessments by AECOM, and work on the preparation of a pre-submission draft Plan (Spring 2020 - Autumn 2020).
 - Stage 3: Pre-submission consultation on the draft Neighbourhood Plan (Regulation 14); preparation of the Landscape and Visual Impact Assessment (LVIA); meetings with key stakeholders; and amendments to the draft Plan (Spring 2021 - Spring 2022).
 - Stage 4: Preparation of supporting documents to the Plan; update to HRA (by AECOM); further amendments to draft Plan to take account of consultation responses from key stakeholders; submission to the City Council; and Regulation 16 consultation and examination (Spring 2022 - Autumn 2023).
- 3.7 Stage 1 was focused around the initial community engagement work with residents, businesses and stakeholders, the identification of the key themes that would be covered by the Plan and the Call for Sites.
- 3.8 During Stage 2, work was focused on the preparation of evidence and the SEA and HRA assessments for the preparation of the draft Regulation 14

consultation Plan, with work on drafting the Plan being undertaken during the Summer and Autumn of 2020.

- 3.9 Stage 3 was focused on the Regulation 14 draft Plan public consultation that was undertaken between 5 January and 16 February 2021 (an additional focused consultation was carried out to ensure engagement with all the necessary statutory consultees from 18 March 2022 for a period of 6 weeks). The consultation was accompanied by local publicity across the Plan area, with a leaflet being distributed to households and businesses in the Parish. In terms of the various statutory consultees, these were contacted separately as listed at Table 1.1 in the Consultation Statement, including the City Council, Kent County Council, adjoining Parish Councils, the Kent Downs AONB unit, local clubs and organisations and utility providers. A series of amendments were made to the draft Plan to take account of all the consultation responses.
- 3.10 Stage 4 comprised the finalisation and updating of the draft submission Plan and supporting documents, following the Regulation 14 consultation, and the formal submission of the draft Plan to the City Council for examination.
- 3.11 The Consultation Statement and its Timeline of Activities and Events provides a full record of the consultation and engagement work that was undertaken during the preparation of the Plan, particularly regarding the Regulation 14 pre-submission consultation held in Spring 2021.
- 3.12 The Parish Council agreed at its meeting held on 9 June 2022 to move forward towards submission of the Plan to the Council under Regulation 15 (for Regulation 16 consultation and then examination), and the Plan was formally submitted shortly thereafter. However, Regulation 16 consultation was delayed until an updated HRA Report had been completed (in March 2023). Regulation 16 consultation then took place for a period of nine weeks from 12 May to 17 July 2023. A total of 39 duly made responses were received during the consultation period, which I have also taken into account as part of this examination. From my assessment of the Consultation Statement, I am satisfied that a transparent, fair and inclusive consultation process has been followed for the Plan, that has had regard to advice in the PPG on plan preparation and engagement and is procedurally compliant in accordance with the legal requirements.

Development and Use of Land

- 3.13 Subject to paragraph 4.27 below (and **PM4**), I am satisfied that the draft Plan sets out policies in relation to the development and use of land in accordance with s.38A of the 2004 Act.

Excluded Development

3.14 From my review of the documents before me, the draft Plan does not include policies or proposals that relate to any of the categories of excluded development.⁹ Kent County Council is the Minerals and Waste Planning Authority for the Plan area, and the relevant Development Plan document for these matters is the adopted Kent Minerals and Waste Local Plan (2013-2030).

Human Rights

3.15 Neither the City Council nor any other party has raised any issues concerning a breach of, or incompatibility with Convention Rights (within the meaning of the Human Rights Act 1998). From my assessment of the Plan, its accompanying supporting documents and the consultation responses made to the Plan at the Regulations 14 and 16 stages, I am satisfied that the Plan has had regard to the fundamental rights and freedoms guaranteed under the European Convention on Human Rights and complies with the Human Rights Act 1998. I consider that none of the objectives and policies in the Plan will have a negative impact on groups with protected characteristics. Many will have a positive impact.

4. Compliance with the Basic Conditions

EU Obligations

4.1 A SEA Environmental Report was prepared by AECOM for the draft Plan, in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004 ('the SEA Regulations') in July 2020, and this was prepared on the basis of the pre-submission policies contained in the draft Plan, prepared during 2020 and which was the subject of Regulation 14 consultation in January/February 2021. An initial Scoping Report was subject to consultation with Natural England, Historic England and the Environment Agency, together with other bodies, in May 2017 and the consultation responses then received have informed the preparation of the Environmental Report, which was published for the purposes of the Regulation 14 consultation stage. No subsequent amendments were made to the report, which has been now submitted as one of the supporting documents to the draft Plan for this examination.

4.2 I have considered the SEA Framework that is set out in the Environmental Report (at Section 3) and process by which the draft Plan was assessed. I note that three site allocation options were assessed for potential residential development, being land east of Bridge and west of the A2 (Site A), Brickfield Farm (Site B) and land at Bourne Park Road (Site C), from a longer list of six sites. The assessment of these sites is set out at Section 4 of the Environmental Report and assesses each site against

⁹ The meaning of 'excluded development' is set out in s.61K of the 1990 Act.
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eight sustainability themes (Biodiversity and Geodiversity, Climate Change, Landscape, Historic Environment, Land, Soil and Water Resources, Population and Community, Health and Wellbeing, and Transportation). The assessments indicate that each of the sites has likely positive effects, likely adverse effects (without mitigation) and neutral effects and/or uncertain effects against the sustainability themes.

- 4.3 The draft Plan takes forward Site A as the sole housing allocation site within the Plan, and the Environmental Report (at paragraphs 4.23-4.25) sets out the factors that have determined this choice of site, as follows:

“4.23 The allocation includes a housing development of a maximum of 40 homes, a new village hall, sports pitches, recreational play areas and undeveloped land for recreational use.

4.24 Development of the site will be subject to the transfer of the Recreation Ground freehold to Bridge Parish Council so as to enable the community use of the Recreation Ground in perpetuity.

4.25 In this context, the Neighbourhood Group’s reasons for allocating the site are as follows:

- There is a need to deliver a degree of housing through the Neighbourhood Plan which enables the delivery of affordable housing to meet the village’s local needs;*
- The site has good proximity to the services and facilities located in the village centre;*
- The allocation offers the opportunity to protect and enhance community provision.*
- There is an absence of any locally or nationally designated sites for biodiversity in the vicinity of the site; and*
- The site will not significantly impact upon the integrity of the strategic ‘green gap’ between Canterbury and Bridge, as proposed through the Canterbury District Local Plan.”*

- 4.4 The Environmental Report (at Section 5) then assesses the draft Policies in the Plan against each of the eight sustainability themes listed above and concludes at paragraphs 5.52 - 5.55 as follows:

“5.52 The assessment has concluded that the current version of the Neighbourhood Plan is likely to lead to significant positive effects in relation to the ‘Population and Community’ and ‘Health and Wellbeing’ SEA Themes. These benefits largely relate to the Neighbourhood Plan’s focus on delivering housing which meets local needs, protecting and enhancing community facilities in the village, improving the quality of life of residents and supporting green infrastructure enhancements.

5.53 The Neighbourhood Plan will also initiate a number of beneficial approaches regarding the 'Biodiversity', 'Climate Change' and 'Transportation' SEA themes. However, these are not considered to be significant in the context of the SEA process given the scope of the Neighbourhood Plan and the scale of proposals.

5.54 The housing allocation proposed through the Neighbourhood Plan will take place on greenfield land within the Kent Downs AONB and the Bifrons Park (Bekesbourne with Patricxbourne/Bridge) Conservation Area. Whilst this will lead to changes in the character of these designated areas, and the loss of some areas of undeveloped land, the policies of the Neighbourhood Plan have a strong focus on protecting and enhancing landscape and villagescape character and the setting of the historic environment, including relating to the three conservation areas in the parish. The Neighbourhood Plan allocation also incorporates significant areas of multifunctional open space within the site, which comprises the majority of the site. This will help limit potential negative impacts of new development at this location.

5.55 Otherwise in relation to the 'Landscape' and 'Historic Environment' themes, the Neighbourhood Plan policies will provide a robust basis for the protection and enhancement of landscape and villagescape character in the Neighbourhood Plan area and the conservation of historic environment assets in Bridge and their settings."

4.5 Overall, I am satisfied that the SEA Environmental Report provides a comprehensive assessment of the draft Plan's policies and proposed housing allocation site against the eight sustainability themes, in accordance with the methodology for such assessments and the SEA Framework that was established for this particular assessment, following earlier consultation on the Scoping Report. I take account of the Report's assessments and conclusions in my own consideration of the Plan's policies and proposed housing allocation site (as contained within Policy C2).

4.6 The draft Plan has also been assessed under the Conservation of Habitats and Species Regulations 2017 (as amended), that are more generally known as the Habitats Regulations, in order to identify whether any site allocation and/or other policies have the potential to cause an adverse effect on the integrity of European Designated Sites, either in isolation or in combination with other plans and projects, and to determine whether site-specific or policy mitigation measures are required. The HRA report for the draft Plan was prepared by AECOM in March 2023.

4.7 There are four sites of European importance within 10 kilometres of the Plan area boundary, these being the Stodmarsh Special Area of Conservation (SAC)/Special Protection Area (SPA)/Ramsar site, the Blean Complex SAC, the Parkgate Down SAC and the Wye and Crundale Downs

SAC. Section 4 of the HRA report identifies two environmental impact pathways that require analysis regarding increased development within the Plan area and the European sites, being water pollution for the Stodmarsh SAC/SPA/Ramsar site and air pollution for all of the sites. The screening assessment of Likely Significant Effects arising from the Plan's policies and proposals only identifies Policy C2, (land allocated for a village hall, sports pitches, local amenity space and a maximum of 40 dwellings), as potentially having such Likely Significant Effects through impacts upon all four European sites. This arises from nitrogen deposition as a result of increased vehicle emissions and, additionally in respect of the Stodmarsh SAC/SPA/Ramsar site, increased surface water runoff and/or increases in sewage effluent.

- 4.8 Section 5 of the HRA report contains the Appropriate Assessment in respect of the potential Likely Significant Effects that are identified above. With regard to air quality, it concludes at paragraph 5.15 that:

"As already identified, the small change in housing numbers at Bridge village delivered through the Neighbourhood Plan does not change the overall housing and employment numbers for Canterbury District. In addition, air quality is inherently an 'in combination' matter when growth across the district is considered cumulatively with growth in other authority areas. It is therefore concluded that air quality assessment previously completed for the Canterbury LP remains appropriate for Bridge NP. Three LP policies provide an overarching requirement for development to promote sustainable modes of transport and for air quality to be considered at the design stage of development. These measures are considered sufficient (given the conclusion of the LP HRA was that no adverse effect on integrity would arise anyway) to support a conclusion of no adverse effects on integrity for the Bridge NP."

- 4.9 With regard to water quality, concerning surface water runoff from the proposals contained within Policy C3 in the draft Plan, the report concludes at paragraph 5.29 that:

"Policy C3 currently states that 'development must comply with all the relevant policies, particularly those relating to building within areas prone to flooding'. However, this concerns itself solely with flood risk. It is strongly recommended that wording is also included in Policy C3 that states that new development at this site will not be supported unless it contains details of the measures that will be taken to ensure that polluted runoff (including suspended sediment) does not leave the site and enter the Nail Bourne and surrounding waterbodies during construction and operation."

- 4.10 With regard to water quality, arising from the discharge of treated sewage effluent from the 40 new dwellings proposed within Policy C2, the report identifies the following matters of importance at paragraphs 5.41-5.43:

"5.41 As such, according to the Stodmarsh Nutrient Neutrality
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Methodology the following text is recommended for inclusion in the Neighbourhood Plan Policy C3: the development will only be supported if it can achieve nutrient neutrality regarding Stodmarsh SAC/SPA.

5.42 Assuming the developer's nutrient neutrality calculation confirms that mitigation is required, it is likely that some or all of the following may need to be undertaken. This could be added to the NP as an explanatory note for Policy C3.

5.43 If mitigation is required, the following should be explored:

- i. Secured agreement with the wastewater treatment provider that they will maintain an increase in nitrogen/phosphorous removal at the WwTW though this will be unlikely to be successful until after the Environment Agency's Water Industry National Environment Programme (WINEP) study is completed and the measures required to achieve favourable conservation status with regards to treatment works have been agreed.*
- ii. Secured agreement with the wastewater treatment provider or others to provide and maintain an increase in nitrogen/phosphorous offsetting from catchment management measures (this may include mini-farm interceptor wetlands). This must take account of the restoration duties and must not hinder the ability to achieve the conservation objectives.*
- iii. Provide measures that will remove nitrogen/phosphorous draining from the development site or discharged by the WwTW (such as wetland or reedbed).*
- iv. Increase the size of the SANGs and Open Space provision for the development on agricultural land that removes more nitrogen/phosphorous loss from this source.*
- v. Establish changes to agricultural land in the wider landholding in perpetuity that removes more nitrogen/phosphorous loss from this source.*
- vi. Acquire, or support others in acquiring, agricultural land elsewhere within the river catchment area containing the development site (or the waste water treatment discharge if different), changing the land use in perpetuity (e.g. to woodland, heathland, saltmarsh, wetland or conservation grassland) to remove more nitrogen/phosphorous loss from this source and/or, if conditions are suitable, provide measures that will remove nitrogen/phosphorous on drainage pathways from land higher up the catchment (e.g. interception wetland).*

- vii. *Seek additional information and methodologies for mitigation on wetlands through The Wetland Hub and the Wetland Mitigation Framework.”*

I take account of all these matters as part of my further consideration of Policy C3 set out at paragraphs 4.38 and 4.39 below.

- 4.11 The HRA report concludes at paragraph 6.1 by stating that *“for Policy C3 that was brought forward for appropriate assessment the appropriate safeguarding policy wording should be added. With the recommendations in this assessment incorporated into the Bridge Neighbourhood Plan and given there is now considerable precedent for acceptable nutrient offsetting schemes in the Stodmarsh catchment, it is concluded that this would give sufficient confidence at the Neighbourhood Plan level that no adverse effect would occur on the integrity of European Sites”*.
- 4.12 Overall, I consider that, on the basis of the information provided and my own independent and detailed consideration of the SEA Environmental Report, the HRA report and the Plan itself, I am satisfied that the Plan is compatible with EU obligations under retained EU law, subject to taking account of the matters raised by the Appropriate Assessment within the HRA Report, that are set out above.¹⁰

Main Assessment

- 4.13 The NPPF states (at Paragraph 29) that *“Neighbourhood planning gives communities the power to develop a shared vision for their area. Neighbourhood plans can shape, direct and help to deliver sustainable development, by influencing local planning decisions as part of the statutory development plan”* and also that *“Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies”*. The NPPF (at Paragraph 11) also sets out the presumption in favour of sustainable development. It goes on to state (at Paragraph 13) that neighbourhood plans should support the delivery of strategic policies contained in local plans; and should shape and direct development that is outside of these strategic policies.
- 4.14 Having considered above whether the Plan complies with various legal and procedural requirements, it is now necessary to deal with the question of whether it complies with the remaining Basic Conditions (see paragraph 1.13 of this report), particularly the regard it pays to national policy and guidance, the contribution it makes to sustainable development and whether it is in general conformity with strategic development plan policies.
- 4.15 I test the Plan against the Basic Conditions by considering specific issues of compliance of the Plan’s 14 policies, which address the following themes: Building a Strong, Competitive Economy and Ensuring the Vitality

¹⁰ See also paragraph 4.35 below.

of the Village Centre; Promoting Sustainable Transport; To Maintain a Choice of High-Quality Homes with Good Design; Promoting Healthy Communities; Meeting the Challenges of Climate Change and Flooding and Conserving and Enhancing the Natural Environment; and Conserving and Enhancing the historic Environment. These themes correlate with the Plan's objectives (see also paragraph 4.16 below). As part of that assessment, I consider whether the policies in the Plan are sufficiently clear and unambiguous, having regard to advice in the PPG. A policy should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence.¹¹ I recommend some modifications as a result.

Overview

- 4.16 The Plan is addressing the period from 2022 to 2037 and seeks to provide a planning framework to enable Bridge to remain as a sustainable village community with policies focused on the following six objectives:
- a) to build a strong, competitive economy and ensure the vitality of the village centre;
 - b) to promote sustainable transport;
 - c) to maintain a choice of high quality homes with good design;
 - d) to promote a healthy community;
 - e) to meet the challenges of climate change and flooding and to conserve and enhance the natural environment; and
 - f) to conserve and enhance the historic environment.

These six objectives comprise the themes for the Policy sections (Sections 2-7) within the draft Plan.

- 4.17 Section 1 of the Plan provides an introduction to the Plan and contains the Vision for the future of Bridge until 2037, which is as follows:

“By 2037 Bridge will continue as a sustainable, identifiable, village community that values its open space and separation from Canterbury. It will have developed local services and transport links that provide residents with a strong safe community identity. The historic fabric of the village will be conserved and enhanced. By encouraging new sustainable development as per NPPF 2021 paragraphs 8 and 9, enhancing our valued green spaces and the setting of our heritage assets, Bridge will be a thriving village with a strong sense of community, where our streets are safe, clean and with amenities and services to offer our residents and visitors.”

As a focused amendment to the Plan's Vision, the reference to the NPPF 2021 should now be to the NPPF 2023 (see also paragraph 2.4 above). Recommended modification **PM1** addresses this amendment.

¹¹ PPG Reference ID: 41-041-20140306.

4.18 The Basic Conditions Statement (at Sections 2, 3 and 4, together with its Appendices) sets out how the Plan, and its objectives and policies, has regard to national policies contained in the NPPF and the relevant strategic policies in the adopted CDLP (2017) and so contributes to the achievement of sustainable development.

4.19 Upon my initial assessment of the Plan, I noted, with regard to sustainable

development, that the Plan's six objectives together with the Plan's Vision, when considered in combination, address the national requirement to contribute to the achievement of sustainable development, as it applies to the Plan area. I am satisfied that, subject to the modifications that I recommend to specific policies below, that individually and collectively the Plan's policies will contribute to the achievement of sustainable patterns of development. There are also a number of detailed matters which require amendment to ensure that the policies have the necessary regard to

national policy and guidance and are in general conformity with the strategic

policies of the City Council. Accordingly, I recommend modifications in this

report in order to address these matters.

Specific Issues of Compliance

4.20 I turn now to consider each of the proposed policies in the draft Plan, which are contained in six sections for each of Objectives A-F. I take into account, where appropriate, the representations that have been made concerning the policies.

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

4.21 Section 2 in the draft Plan addresses Objective A and the theme of the local economy in the Plan area and contains one policy (Policy A1).

4.22 Policy A1 states that proposals for the development of new business uses within the built-up area boundary of Bridge will be permitted provided they do not lead to the loss of shops or of community facilities and do not harm residential amenity. Subject to some revisions to the Policy text in order to improve its clarity for users of the Plan, I am satisfied that this Policy is appropriately justified, and will assist in achieving Objective A. The amendments to the Policy text are addressed by recommended modification **PM2**.

4.23 With recommended modification PM2, I consider that the draft Plan's section on Building a Strong Competitive Economy and Ensuring the Vitality of the Village Centre and its accompanying policy (Policy A1) is in general conformity with the strategic policies of the CDLP, has regard to national guidance, would contribute to the achievement of sustainable development and so would meet the Basic Conditions.

Objective B - Promoting Sustainable Transport

- 4.24 Section 3 in the draft Plan addresses Objective B and the theme of promoting sustainable transport in the Plan area and contains two policies (Policies B1 and B2).
- 4.25 Policy B1 states that the Plan will support development proposals which integrate with and take opportunities to expand the local cycle network, and also that development proposals should provide traffic-free cycle and pedestrian routes wherever possible. Subject to two focused amendments to the Policy text, I am satisfied that the Policy is appropriately justified and will assist in achieving sustainable travel within the Plan area. The amendments are addressed by recommended modification **PM3**.
- 4.26 Policy B2 states that all development proposals will endeavour to provide adequate provision for off-street parking except where local settings or characteristics will not reasonably allow this. It goes on to state that development applications that would significantly increase the parking problems in Bridge will not be supported.
- 4.27 Upon my initial assessment of the Plan, I noted that this Policy, as drafted, is flawed in that "*the parking problems in Bridge*" are not a matter that this Plan can seek to resolve directly, as the enforcement of car parking is a matter covered by other legislation and its associated regulations. Accordingly, I raised my concerns with the Parish Council as Question No. 1 (see paragraph 2.7 above). I take account of the Parish Council's response to that question in my assessment. I consider that it is necessary for the Policy to be re-drafted, to reflect the replacement text suggested by the Parish Council, and the revised Policy text is set out at recommended modification **PM4**.
- 4.28 With recommended modifications PM3 and PM4, I consider that the draft Plan's section on Promoting Sustainable Transport and its accompanying policies (Policies B1 and B2) is in general conformity with the strategic policies of the CDLP, has regard to national guidance, would contribute to the achievement of sustainable development and so would meet the Basic Conditions.

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

- 4.29 Section 4 in the draft Plan addresses Objective C and the theme of maintaining a choice of high-quality homes with good design in the Plan area and contains three policies (Policies C1-C3).
- 4.30 Policy C1 is the principal policy concerning building design in the draft Plan. It states that all development must be designed to a high quality, responding to the heritage, landscape and locally distinctive character of Bridge as described in the Bridge Architectural Design Statement. It then

sets out a series of 14 design criteria which should be taken into consideration as part of the design of new developments. Although the Policy, as drafted, is lengthy, I am satisfied that it is justified and sets out relevant design criteria in order to promote the good design of new developments within the Plan area. This is consistent with national policy. Subject to two focused amendments to ensure clarity in the Policy, I do not recommend any other revisions to the Policy text. Recommended modification **PM5** sets out details of the two amendments.

- 4.31 Policy C2 states that on the site contained within Appendix E, land is allocated for a village hall, sports pitches, recreational play areas, for car parking which will also assist in alleviating the pressures for parking spaces at peak times around the primary school, for undeveloped land for recreational use, and for a housing development of 47 housing units. The Policy goes on to state that the support for any part of the housing development will be subject to the transfer of the Recreation Ground freehold from private ownership to Bridge Parish Council so as to enable the community use of the Recreation Ground in perpetuity, *"and the provision of such other elements as are agreed by Cantley Limited and Bridge Parish Council as set out in Appendix E"*.
- 4.32 Upon my initial assessment of the draft Plan, and of the representations that concern this Policy and its proposals, I identified some very significant concerns regarding the Policy and its supporting material, including Appendix E. I set out those concerns to the Parish Council as Question No. 2 (see paragraph 2.7 above for full details). In my detailed evaluation of the Policy, I have taken account of the Parish Council's response to the question, which was provided on 12 September 2023, together with full consideration of the supporting evidence, which includes the Bridge Housing Needs Survey (2017) and the Landscape and Visual Impact Assessment (LVIA) (2021). I have also paid careful regard to the assessments of the proposals as undertaken by the SEA and HRA assessments and set out in the SEA Environmental Report and the HRA Report.
- 4.33 The land covered by the proposed allocations contained within Policy C2 is within the Kent Downs AONB, and I have taken account of the national policy set out at Paragraph 177 of the NPPF in my assessment of the proposals. The scale and extent of the proposed development would constitute major development within the AONB, and national policy states that planning permission should be refused for such development other than in exceptional circumstances. I note that, following consultation with the Kent Downs AONB Unit at the Regulation 14 consultation stage, the draft Plan was amended to take account of the response received, and that the draft Plan sets out the factors that are considered to be the exceptional circumstances to justify the proposed scale and extent of development set out within the Policy. I have also given careful consideration to the assessments of the site (then defined as Site A) within the SEA Environmental Report, as more fully described above. Overall, I consider that the development of the site, by virtue of its specific location immediately to the west of the A2 embankment that

forms part of the Bridge By-pass, will have lesser impacts upon the wider area within the AONB and upon the setting of the village, in comparison to the other site options evaluated as part of the SEA process. I am satisfied that the exceptional circumstances necessary to support the proposed allocation in the Plan have been demonstrated in principle at this stage, subject to the necessity to undertake further assessments of the scale, design and impacts of more detailed proposals that may come forward in future planning applications.

- 4.34 The genesis of the proposals now set out in this Policy follows a 'Call for Sites' undertaken by the Parish Council in 2019 together with an appraisal of potential sites identified in the City Council's Strategic Housing Land Availability Assessment (SHLAA) reports of 2014 and 2015 and New Sites Submissions report of 2016. From a list of six potential sites, three sites were taken forward for detailed assessment in the SEA process, being Sites A, B and C as assessed at Section 4 of the SEA Environmental Report. It should be noted that the aim of the Neighbourhood Plan Committee, at that stage, was to identify a potential site with the capacity to deliver in the region of 40 new homes and community infrastructure on a single site. The sites were evaluated in the context of three alternative options (Options 1, 2 and 3) for the potential growth of housing in the Plan area up to 2035 (which was at that time the proposed end date of the Plan period). Option 2 is of most relevance to this Policy as it sought to facilitate housing growth amounting to between 30-50 dwellings, with the aim of delivering the affordable housing need identified in the Housing Needs Survey. As set out at paragraph 4.3 above, the Plan takes forward Site A (which now forms the basis of Policy C2) to meet the aims of Option 2. In these respects, I am satisfied that the draft Plan, and specifically the site selected for inclusion within the Policy, is based upon an appropriate and comprehensive assessment, through the SEA process, of its sustainability performance.
- 4.35 Notwithstanding that point, I continue to have concerns regarding the matters raised by the more recent HRA Report. In particular, it is clear from Section 5 of the HRA report that the Appropriate Assessment has been based upon a quantum of 40 new residential units¹² within the Parish by the end of the Plan period (which is again stated to be 2035 in that report). This of course also includes new dwellings that may be permitted on other sites, for example by infill developments or other 'windfall' proposals. The impacts upon water quality at the Stodmarsh SAC/SPA site have not been assessed for a greater number than 40 dwellings, and this is important as the possible impacts of 47 new dwellings (i.e. an increase of 17.5%) have not been assessed. Until such time as that higher quantum of development has been assessed, and its effects upon water quality at the Stodmarsh SAC/SPA site measured, it is my firm conclusion that Policy C2 should include a maximum quantum of 40 new dwellings, and not 47 dwellings as presently stated. This is a matter that will need to be further addressed at a future planning application stage, should proposals for a greater number of new dwellings then be brought

¹² As does paragraph 4.23 of the Environmental Report.

forward. The necessity to avoid any harmful effects upon the water quality at the Stodmarsh SAC/SPA site is a matter of national importance.

- 4.36 I am satisfied that the planning principles underlying the proposed allocation of the site identified within the Policy are soundly based, namely to allocate the site for new residential development, including an appropriate proportion of affordable housing to assist in meeting local needs, the proposed development of a new village hall, improved recreational facilities, the designated Local Green Space and provision of additional car parking to serve the adjoining Primary School. However, as drafted, the Plan, the Policy itself and Appendix E refer to potential non-planning matters that are of a contractual nature between the Parish Council and third parties. All such references should be removed from the Plan, and I have taken no account of any material of this nature in my own assessment. I am also clear that Appendix E has been prepared on behalf of a development company, and not by the Parish Council, and my recommended modification includes the deletion of this Appendix from the Plan.
- 4.37 In conclusion, this Policy and its supporting justification require substantive amendment in order that it can constitute an appropriate site allocation proposal within a statutory development plan. In recommending the necessary amendments, I have taken full account of the representations that were made specifically concerning this Policy and its content. I recognise that it is a controversial proposal within the community. Nevertheless, I consider that the potential benefits to the community are significant. A future planning application will be the appropriate mechanism by which more detailed proposals for the future development of the site can be considered by all relevant parties. Overall, I am satisfied that, with the amendments set out in the recommended modification, the proposals set out in this Policy should contribute to achieving sustainable development in Bridge.
- 4.38 Recommended modification **PM6** addresses the necessary amendments to this policy and to its supporting justification, together with the deletion of Appendix E from the Plan, as noted in more detail above. This is a consolidated modification covering all necessary amendments across the draft Plan.
- 4.39 Policy C3 states that before any development takes place developers shall carry a thorough investigation related to the drainage and the sewerage systems and identify any potential increase in flood hazard in Bridge and the surrounding areas which might result from the development. It then goes on to promote the use of Sustainable Drainage Systems and stipulates that development will only be supported if it can achieve nutrient neutrality regarding the Stodmarsh SAC/SPA.
- 4.40 In some respects, this Policy duplicates the requirements of Policy E1. However, I am satisfied that Policy E1 is directed more at the issue of flood risk whereas this Policy is seeking to secure sustainable drainage systems as part of new developments in the Plan area, and to achieve nutrient neutrality at the Stodmarsh SAC/SPA. This reflects the

recommendation set out at paragraph 5.41 of the HRA report (see paragraph 4.10 above), but the advice contained at paragraph 5.43 of the HRA report is not reflected in the Plan. I consider this to be a significant omission from the Plan, in view of the importance of that advice, and recommended modification **PM7** sets out additional text to the supporting justification for this policy (as new paragraph 4.21) together with some amendments to the Policy text.

- 4.41 With recommended modifications PM5-PM7, I consider that the draft Plan's section on Maintaining a Choice of High-Quality Homes with Good Design in the Plan area and its accompanying policies (Policies C1-C3) is in general conformity with the strategic policies of the CDLP, has regard to national guidance, would contribute to the achievement of sustainable development and so would meet the Basic Conditions.

Objective D - Promoting Healthy Communities

- 4.42 Section 5 of the draft Plan addresses Objective D and the theme of promoting healthy communities in the Plan area and contains one policy (Policy D1).
- 4.43 Policy D1 states that development proposals must retain and, where appropriate, enhance public rights of way and important local green spaces and green infrastructure around the village which contribute to the health and wellbeing of the residents. Subject to some focused amendments to the Policy text, in order to ensure clarity for users of the Plan, I am satisfied that the Policy is appropriately justified and will assist in meeting the objective of promoting healthy communities. The amendments are addressed by recommended modification **PM8**.
- 4.44 With recommended modification PM8, I consider that the draft Plan's section on Promoting Healthy Communities and its accompanying policy (Policy D1) is in general conformity with the strategic policies of the CDLP, has regard to national guidance, would contribute to the achievement of sustainable development and so would meet the Basic Conditions.

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

- 4.45 Section 6 in the draft Plan addresses Objective E and the related themes of meeting the challenges of climate change and flooding and conserving and enhancing the natural environment in the Plan area and contains five policies (Policies E1-E5).
- 4.46 Policy E1 states that the flood risk within the Plan area is identified as being so significant that no new residential development within Flood Zone 3 will be supported unless the development satisfies a Flood Risk Assessment. An accompanying map (on Page 22) comprises an extract of

the Environment Agency's Flood Risk Map identifying the Flood Zones for the village of Bridge at May 2018.

- 4.47 In my assessment, the Policy and its accompanying map do require some revisions. Firstly, the Policy only refers to residential development and it is the case that other categories of development may require the submission of a Flood Risk Assessment as part of the planning application process. Secondly, the accompanying map only provides Flood Zone information for the central parts of the village of Bridge. As the Policy does apply to the whole of the Plan area, this map should be replaced by a map showing relevant Flood Zone information across a larger part of the Plan area, for example to show the areas at risk of surface water flooding lying south of Pett Bottom Road to the west of the village. It should also be updated from the May 2018 information to that which is currently available from the Environment Agency. I therefore recommend appropriate amendments to address these points, and these amendments are set out at **PM9**.
- 4.48 Policy E2 states that development proposals that reduce a sense of openness and separation between Bridge and Canterbury will not be supported so as to ensure that the individual identity of these two settlements is retained. The policy reflects the strongly held view of the Bridge community that proposals which would lead to the gradual coalescence of the village with the larger urban area of Canterbury would have adverse impacts upon the setting and character of the village. I recognise the importance of that issue to the Bridge community and consider that the policy is justified. I do recommend an amendment to the Policy text to provide greater clarity for users of the Plan, and this is addressed by recommended modification **PM10**.
- 4.49 Policy E3 states that additional development within the Parish during the Plan period, other than that which is set within Appendix E, will only be supported where sustainable significant overall benefit to the village or exceptional circumstances can be demonstrated. As drafted, this Policy is flawed as it potentially places a serious restraint upon any new development within the whole of the Plan area up to 2037, beyond that described within Appendix E. This is contrary to both national and local policy and the Policy text therefore requires redrafting to ensure that it provides appropriate guidance. Furthermore, the Policy is not supported with the necessary justification to reflect its present content. Additionally, as noted at paragraph 4.34 above, I recommend that Appendix E be deleted from the Plan, as it does not constitute a formal Site Allocation plan and contains information which is of a possible contractual nature between the Parish Council and a third party.
- 4.50 I consider that this policy should focus on the need to secure appropriate sustainable development within the Plan area and that it should also refer to the national policy requirement for Biodiversity Net Gain (BNG) (which will be progressively introduced from January 2024) in line with the requirements of the Environment Act 2021. The necessary amendments to this Policy are addressed by recommended modification **PM11**.

- 4.51 Policy E4 provides that the Parish Council will seek to support important Local Green Spaces within the village. Seven proposed Local Green Spaces are shown on the accompanying map (at Page 25) and listed in more detail at Page 26. It states that these should be protected from development other than that proposed elsewhere within the Plan. As Question No. 3, I sought further information concerning this Policy, including appropriate inset maps at a suitable scale to clearly identify the boundaries of each of the seven proposed Local Green Spaces. The Parish Council has provided the requisite inset maps at a scale of 1:1250 as part of its response dated 12 September 2023. I recommend that these maps be included in the Plan to immediately follow the map at Page 25. However, they should be correctly titled for each of the Local Green Spaces and the drawing details and descriptions presently contained on the inset maps should be removed, as they contain extraneous information.
- 4.52 I visited all of the seven sites during the course of my site visit and have assessed the proposed designation of each site as a Local Green Space against the criteria set out in the NPPF at Paragraph 102 which states that the Local Green Space designation should only be used where the green space is:
- a) in reasonably close proximity to the community it serves;*
 - b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and*
 - c) local in character and is not an extensive tract of land."*
- Paragraph 101 of the NPPF further states that Local Green Space should be capable of enduring beyond the end of the Plan period.¹³
- 4.53 I consider that the sites at Church Meadow, land between Brickfields and the Nailbourne, and the Water Meadows along Brewery Lane are green spaces which make a significant contribution to the setting and character of those parts of the village within which they are situated. The sites at Patixbourne Road/Riverside Close, and along Western Avenue are attractive managed green spaces within residential areas in the village and are clearly of special value to local residents, particularly in the case of the three parcels of land along Western Avenue. The site to the west of the High Street north of the village centre is used as allotments, whilst the Recreation Ground at Patixbourne Road provides an important recreational and sports facility for the Bridge community. I am satisfied that all of the seven proposed Local Green Spaces meet the criteria set out in the NPPF, and that they should be designated as Local Green Spaces.
- 4.54 With regard to the policy text, and specifically in relation to managing development within a Local Green Space, this should be consistent with

¹³ See also the advice in PPG Reference IDs: 37-005-20140306 to 37-022-20140306.
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those for Green Belts (NPPF, paragraph 103). Therefore, I recommend that the policy text as drafted be modified to reflect that requirement. Recommended modification **PM12** addresses the necessary amendments to Policy E4 and related parts of the Plan.

- 4.55 Policy E5 states that the Plan supports measures to reduce light pollution and promote the visibility and clarity of the night sky. It goes on to state that applications for additional external lighting within the Conservation Area will not be supported if they would increase light pollution within the village and/or adversely affect their surroundings. I consider that the Policy is appropriately drafted and justified, subject to two focused amendments to the Policy text which are addressed by recommended modification **PM13**.
- 4.56 With recommended modifications PM9-PM13, I consider that the draft Plan's section on Meeting the Challenges of Climate Change and Flooding and Conserving and Enhancing the Natural Environment, with its accompanying policies (Policies E1-E5), is in general conformity with the strategic policies of the CDLP, has regard to national guidance, would contribute to the achievement of sustainable development and so would meet the Basic Conditions

Objective F - Conserving and Enhancing the Historic Environment

- 4.57 Section 7 of the draft Plan addresses Objective F and the theme of conserving and enhancing the historic environment in the Plan area and contains two policies (Policies F1 and F2).
- 4.58 Policy F1 states that, to respect the existing village character and appearance, in terms of massing, scale, style and setting, new development should complement the present building designs and materials. Subject to some amendments to secure clarity, I am satisfied that the Policy is appropriately justified, and the necessary amendments are addressed by recommended modification **PM14**.
- 4.59 Policy F2 states that, where appropriate, proposals for new development should carry out an initial archaeological assessment to establish if an archaeological investigation is required. Subject to a focused addition to the Policy text, I am satisfied that this Policy is justified, particularly in the context of the significant archaeological remains that have been discovered within the Bridge area. Recommended modification **PM15** addresses the amendment to the Policy text.
- 4.60 With recommended modifications PM15 and PM16, I consider that the draft Plan's section on Conserving and Enhancing the Historic Environment is in general conformity with the strategic policies of the CDLP, has regard to national guidance, would contribute to the achievement of sustainable development and so would meet the Basic Conditions.

Projects allied to the Policies contained within this Neighbourhood Plan

- 4.61 Pages 29 and 30 of the draft Plan set out a listing of community projects that the Parish Council intend to implement during the Plan period to augment the Plan's policies. The projects are more fully described in other parts of the Plan. I have not considered this aspect of the draft Plan as part of this examination as the projects are not land-use planning policies and are clearly shown (by colour coding) to be projects which are more aspirational in nature.¹⁴

Appendices

- 4.62 The list of Appendices (at page 37) to the draft Plan does not correspond to the Appendices that were included with the draft submission Plan for Regulation 16 consultation.

List of Appendices at Page 37 in the draft Plan (7 Appendices)

- Appendix 1 – Garden City Principles
- Appendix 2 – Schedule of Housing Allocations and Permissions
- Appendix 3 – Housing in Multiple Occupation – Article 4 Direction Area
- Appendix 4 – Local Parking Standards
- Appendix 5 – Outdoor Lighting
- Appendix 6 – Kent Compendium of Parks and Gardens
- Appendix 7 – List of Superseded Policies

List of Appendices for published for Regulation 16 consultation (6 Appendices)

- Appendix A – Bridge Rural Community Profile
- Appendix B – Bridge Architectural Legacy Statement
- Appendix C – Housing Needs Survey
- Appendix D – Strategic Environmental Assessment
- Appendix E – Bridge Fields Plans
- Appendix F – Bridge Landscape and Visual Impact Assessment

I have therefore had regard to the six Appendices that were subject to Regulation 16 consultation, and to the representations that have been made concerning matters within those Appendices. In my assessment, Appendices A-F all constitute supporting evidence base documents that were prepared at various stages for the Plan, and there is no necessity for them to form part of the Plan itself. I also note that there are very few references within the Plan to the accompanying Appendices, and I further note that all of the documents are readily available to view on the Parish Council's website. Accordingly, I recommend that Appendices A-F be deleted from the Plan and that they continue to be made available for reference purposes on the Parish Council's website. Recommended modification **PM16** addresses this matter.

¹⁴ See PPG Reference ID: 41-004-20190509.

Other Matters

- 4.63 As an advisory comment, when the Plan is being redrafted to take account of the recommended modifications in this report, it should be re-checked for any typographical errors and any other consequential changes, etc. Minor amendments to the text and numbering (sections, paragraphs etc.) can be made consequential to the recommended modifications, alongside any other minor non-material changes or updates, in agreement between the Qualifying Body and the City Council.¹⁵

Concluding Remarks

- 4.64 I conclude that, with the recommended modifications to the Plan as summarised above and set out in full in the accompanying Appendix, the Bridge Neighbourhood Development Plan 2022-2037 meets the Basic Conditions for neighbourhood plans.

5. Conclusions

Summary

- 5.1 The Bridge Neighbourhood Development Plan 2022 - 2037 has been duly prepared in compliance with the procedural requirements. My examination has investigated whether the Plan meets the Basic Conditions and other legal requirements for neighbourhood plans. I have had regard to all the responses made following consultation on the Plan, and the supporting documents submitted with the Plan together with the Parish Council and City Council's responses to my questions.
- 5.2 I have made recommendations to modify certain policies and other matters to ensure that the Plan meets the Basic Conditions and other legal requirements. I recommend that the Plan, once modified, proceeds to referendum.

The Referendum and its Area

- 5.3 I have considered whether or not the referendum area should be extended beyond the designated area to which the Plan relates. I conclude that the Bridge Neighbourhood Development Plan 2022-2037, as modified, has no policy or proposal which I consider to be significant enough to have an impact beyond the designated Neighbourhood Plan boundary, requiring the referendum to extend to areas beyond that boundary. I therefore recommend that the boundary for the purposes of any future referendum on the Plan, should be the boundary of the designated Neighbourhood Plan Area.

¹⁵ PPG Reference ID: 41-106-20190509.

Overview

- 5.4 It is clear that the Bridge Neighbourhood Development Plan 2022 - 2037 is the product of much hard work undertaken since 2019 by the Parish Council, its Neighbourhood Plan Committee and the many individuals and stakeholders who have contributed to the preparation and development of the Plan. In my assessment, the Plan reflects the land use aspirations and objectives of the Bridge community for the future planning of their Parish up to 2037. The output is a Plan which should help guide the area's development over that period, making a positive contribution to informing decision-making on planning applications by Canterbury City Council.

Derek Stebbing

Examiner

Appendix: Modifications

Proposed modification number (PM)	Page no./ other reference	Modification
PM1	Page 4	<p><u>The Plan's Vision</u></p> <p>Amend "NPPF 2021" to read "NPPF 2023".</p>
PM2	Page 9	<p><u>Policy A1</u></p> <p>Delete the word "permitted" in the second line of Policy text and replace with "supported".</p> <p>Amend the grammatical symbol ":-" at the end of the first paragraph of Policy text to be a full stop.</p> <p>Delete second and third paragraphs of Policy text and replace with:</p> <p>"The expansion of existing businesses or formation of new businesses should respect the rural character of the Village and should include sufficient provision for vehicle and cycle parking to meet the needs of staff and visitors."</p> <p>"Proposals should also take account of other relevant policies in this Plan and in the adopted Canterbury District Local Plan."</p>
PM3	Page 11	<p><u>Policy B1</u></p> <p>Amend the first paragraph of Policy text to read as follows:</p> <p>"Where appropriate, proposals for new development in the Plan area should seek to integrate with the local cycle network and identify opportunities to extend the network."</p> <p>Amend the words "traffic free" in the second paragraph of Policy text to read "traffic-free".</p>
PM4	Page 11	<p><u>Policy B2</u></p> <p>Delete existing Policy text in full and replace with:</p> <p>"Proposals for new development in the Plan area should seek to incorporate appropriate provision for off-street car parking, together</p>

		<p>with provision for cycle and powered two-wheeler parking, in accordance with the adopted standards of Kent County Council and Canterbury City Council.</p> <p>Where local settings or characteristics will not enable this to be achieved satisfactorily, then the relevant guidance provided by the County Council and the City Council should be followed."</p>
PM5	Page 14	<p><u>Policy C1</u></p> <p>Delete the words "This will include careful consideration of:" in the third line of Policy text and replace with:</p> <p>"Proposals for new development should take full account of:".</p> <p>Criterion n) – delete the word "Whilst" and add semi-colon after criterion m) in place of the existing full stop.</p>
PM6	Pages 15-17	<p><u>Policy C2 and Appendix E</u></p> <p>Delete paragraphs 4.15-4.21 and 4.24 in full.</p> <p>Delete Policy C2 in full.</p> <p>Delete Appendix E in the Plan (see also PM16).</p> <p>Insert new paragraphs 4.15 and 4.16 as follows:</p> <p>"4.15 The proposed housing allocation site for a maximum of 40 new dwellings, as identified in Policy C2, is located adjacent to the Recreation Ground and is within the designated Kent Downs AONB and the Bifrons Park Conservation Area. The site is bounded on two sides by existing residential development, on a third side by the Primary School and on its fourth side by the raised viaduct which carries the A2 road across the Nailbourne. The supporting 'Landscape and Visual Impact Assessment' sets out the mitigation measures that will be necessary to address the satisfactory development of the site.</p> <p>4.16 By allocating up to 40 housing units at the site, to include affordable housing units in accordance with Canterbury City Council's policy requirements, the village has the</p>

	<p>opportunity to secure, as part of the overall development proposals for the site, a new village hall with appropriate car parking spaces, land for football pitches and an associated pavilion building, tennis courts, a formal children’s play area and the proposed Local Green Space. This will significantly enhance the recreational and community facilities within the village”.</p> <p>Re-number paragraphs 4.22/4.23/4.25/4.26 to be 4.17-4.20 respectively.</p> <p><u>Note</u> that paragraph 4.23 includes the words “Conynghame Lane” in two places, which should read “Conyngham Lane”.</p> <p>Insert revised Policy C2 to read as follows:</p> <p>“Policy C2</p> <p>Land to the north of Patrixbourne Road, Bridge totalling 7.44 hectares, as defined on the accompanying site plan, is allocated for the development of up to 40 new dwellings, including affordable housing units, a new village hall, additional sports pitches, tennis courts, a children’s play area, the designated Local Green Space and car parking to serve these facilities and the adjoining Bridge and Patrixbourne C of E Primary School.</p> <p>The development of this site, which is within the Kent Downs Area of Outstanding Natural Beauty and the Bifrons Park Conservation Area must be undertaken in compliance with all relevant policies of the adopted Canterbury</p> <p>District Local Plan and of this Plan, and in accordance all other relevant guidance.</p> <p>The development of the site shall also secure Biodiversity Net Gain (BNG) at a level of at least 10% above the baseline position, in accordance with the national policy requirements contained in the Environment Act 2021 and its accompanying policy guidance.”</p> <p>Insert Site Allocation Plan (as contained in the Parish Council’s response dated 12 September 2023 and appropriately titled, but with extraneous material removed) to immediately follow Policy C2</p>
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		in the Plan.
PM7	Page 18	<p><u>Policy C3</u></p> <p>Delete the word “sewage” in the second line of Policy text and replace with “sewerage”.</p> <p>Delete the words “Planning decisions” in the first line of Policy text in the third paragraph and replace with “Proposals for new development in the Plan area”.</p> <p>Add new fourth paragraph of Policy text to read as follows:</p> <p>“All proposals for new development should take account of the guidance set out at paragraph 4.21.”</p> <p>Add new paragraph 4.21 to the supporting text to read as follows:</p> <p>“4.21 If mitigation measures to achieve nutrient neutrality at the Stodmarsh SAC/SPA are required, the following measures should be considered:</p> <ol style="list-style-type: none"> a. Secured agreement with the wastewater treatment provider that they will maintain an increase in nitrogen/phosphorous removal at the Wastewater Treatment Works (WwTW); b. Secured agreement with the wastewater treatment provider or others to provide and maintain an increase in nitrogen/phosphorous offsetting from catchment management measures (this may include mini-farm interceptor wetlands); c. Provide measures that will remove nitrogen/phosphorous draining from the development site or discharged by the WwTW (such as wetland or reedbed); d. Increase the size of the Open Space provision for the development on agricultural land that removes more nitrogen/phosphorous loss from this source. e. Establish changes to agricultural land in the wider landholding in perpetuity that

		<p>removes more nitrogen/phosphorous loss from this source;</p> <p>f. Acquire, or support others in acquiring, agricultural land elsewhere within the river catchment area containing the development site (or the waste water treatment discharge if different), changing the land use in perpetuity (e.g. to woodland, heathland, saltmarsh, wetland or conservation grassland) to remove more nitrogen/ phosphorous loss from this source and/or, if conditions are suitable, provide measures that will remove nitrogen/ phosphorous on drainage pathways from land higher up the catchment (e.g. interception wetland); and</p> <p>g. Seek additional information and methodologies for mitigation on wetlands through The Wetland Hub and the Wetland Mitigation Framework."</p>
PM8	Page 20	<p><u>Policy D1</u></p> <p>Amend Policy text to read as follows:</p> <p>"Development proposals in the Plan area should retain and, where appropriate, seek to enhance the public rights of way, important local green spaces and other green infrastructure around the village which contribute to the health and wellbeing of residents."</p>
PM9	Pages 21-23	<p><u>Policy E1</u></p> <p>Delete existing Policy text in full and replace with:</p> <p>"Proposals for new development within those parts of the Plan area which are at higher risk of flooding, as shown on the accompanying map at Page 23, will only be supported if it can be satisfactorily demonstrated through an accompanying Flood Risk Assessment and any required mitigation measures that the development will not lead to any greater risks of flooding at the site itself and within the surrounding areas.</p>

		<p>Advice on flood risk and the preparation of Flood Risk Assessments is contained in Planning Practice Guidance (PPG) at https://www.gov.uk/guidance/flood-risk-and-coastal-change".</p> <p>Replace the map on Page 22 with an updated map depicting all parts of the Plan area that are identified as being with Flood Zones 2 and 3 and containing the latest Environment Agency data, as published in 2023.</p>
PM10	Page 23	<p><u>Policy E2</u></p> <p>Amend Policy text to read as follows:</p> <p>"Proposals for new development that would lead to the coalescence of the village of Bridge with the urban area of Canterbury will not be supported, in order to ensure that the setting and character of the village and the open countryside between the settlements is not adversely affected, and that the individual identity of the two settlements is retained."</p>
PM11	Page 24	<p><u>Policy E3</u></p> <p>Delete existing Policy text in full and replace with:</p> <p>"Proposals for new development in the Plan area should seek to achieve sustainable development by contributing positive benefits to the social, economic and environmental characteristics of the Parish.</p> <p>Relevant proposals should also secure Biodiversity Net Gain (BNG) at a level of at least 10% above the baseline position, in accordance with the national policy requirements contained in the Environment Act 2021 and its accompanying policy guidance."</p>
PM12	Pages 24-26	<p><u>Policy E4</u></p> <p>Delete existing policy text in full and replace with:</p> <p>"Development proposals in the seven designated Local Green Spaces listed on Page 26 and defined on the accompanying maps to</p>

		<p>this policy will be managed in accordance with national policy for Green Belts.”</p> <p><u>Page 25</u></p> <p>Amend the title of this map to read “Map of Designated Local Green Spaces”.”</p> <p>Insert Inset Maps (titled and numbered for each of the Local Green Spaces, but with extraneous material removed) to follow the map on Page 25.</p> <p><u>Page 26</u></p> <p>Replace the table on Page 26 with the revised table provided with the Parish Council’s response dated 1 September 2023. (<u>Note</u> that the revised table includes explanatory text for Site 7 which includes “Weston Avenue” in the third column, which should read “Western Avenue”).</p>
PM13	Page 27	<p><u>Policy E5</u></p> <p>Replace the words “The Neighbourhood Plan supports” in the first line of Policy text and replace with “Proposals and initiatives which include”.</p> <p>Add the words “will be supported.” at the end of the first sentence of Policy text.</p>
PM14	Page 28	<p><u>Policy F1</u></p> <p>Amend Policy text to read as follows:</p> <p>“To reflect the existing character, appearance and setting of the village of Bridge, the design of proposed new developments should seek to complement the local vernacular in terms of massing, scale, building style and materials.”</p>
PM15	Page 28	<p><u>Policy F2</u></p> <p>Amend Policy text to read as follows:</p> <p>“Where appropriate, proposals for new development in the Plan area will be required to include an initial archaeological assessment of the development site. If necessary, a full archaeological investigation of the site will be required prior to the commencement of any development.”</p>

PM16	Pages 3 and 37	<p><u>Appendices</u></p> <p>Delete Appendices A-F from the Plan in full (and from the Contents Page) and replace the incorrect entry at Page 37 under the heading of "Appendices" with the following text:</p> <p>"Supporting Documents</p> <p>The following supporting documents that have been prepared for this Plan are available to view at the Parish Council – Bridge Village website</p> <p>www.bridgevillage.org.uk/parish-council/:</p> <ul style="list-style-type: none"> • Bridge Rural Community Profile • Bridge Architectural Legacy Statement • Housing Needs Survey • Strategic Environmental Assessment • Habitats Regulations Assessment • Bridge Fields Plans • Bridge Landscape and Visual Impact Assessment." <p>Delete all references and cross-references to Appendices A-F within the text of the Plan, for example at the foot of Page 6.</p>
PM17	Page 8	<p><u>Paragraph 1.8</u></p> <p>Delete existing text, and replace with new sub-section entitled "Monitoring and Review", with the following text:</p> <p>"1.8 The Parish Council will monitor the effectiveness of the policies in this Plan to ensure that they achieve the Plan's Objectives. Future reviews of the Plan will take account of the emerging review of the Canterbury District Local Plan to ensure that the Plan remains in general conformity with the strategic policies of the Local Plan."</p>