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Environmental Report to accompany the submission version of the Neighbourhood Plan

July 2020

Quality information

Prepared by	Checked by	Verified by	Approved by
Ryan Putt Environmental Consultant	Nick Chisholm-Batten Associate Director	Alastair Peattie Associate Director	Alastair Peattie Associate Director

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Prepared for:

Bridge Neighbourhood Plan Steering Group

Prepared by:

AECOM Limited Aldgate Tower 2 Leman Street London E1 8FA United Kingdom aecom.com

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Non-Technical Summary

What is Strategic Environmental Assessment?

A strategic environmental assessment (SEA) has been undertaken to inform the Bridge Neighbourhood Plan. This process is required by the SEA Regulations.

Neighbourhood Plan groups use SEA to assess Neighbourhood Plans against a set of sustainability objectives developed in consultation with interested parties. The purpose of the assessment is to avoid adverse environmental and socio-economic effects through the Neighbourhood Plan, and identify opportunities to improve the environmental quality of the area covered by the Neighbourhood Plan and the quality of life of residents.

What is the Bridge Neighbourhood Plan?

The Bridge Neighbourhood Plan is currently being prepared as a Neighbourhood Development Plan under the Localism Act 2011 and the Neighbourhood Planning (General) Regulations 2012. The Bridge Neighbourhood Plan is being prepared in the context of the Canterbury District Local Plan, which was adopted in July 2017. It is currently anticipated that the Bridge Neighbourhood Plan will be submitted to Canterbury City Council later in 2020.

Purpose of this Environmental Report

This Environmental Report, which accompanies the submission version of the Neighbourhood Plan, is the latest document to be produced as part of the SEA process. The first document was the SEA Scoping Report (May 2017), which includes information about the Neighbourhood Plan area's environment and community. Earlier versions of the Neighbourhood Plan were accompanied at Regulation 14 consultation by an Environmental Report.

The purpose of this Environmental Report is to:

- Identify, describe and evaluate the likely significant effects of the Bridge Neighbourhood Plan and alternatives; and
- Provide an opportunity for consultees to offer views on any aspect of the SEA process which has been carried out to date.

The Environmental Report contains:

- An outline of the contents and main objectives of the Bridge Neighbourhood Plan and its relationship with other relevant policies, plans and programmes;
- Relevant aspects of the current and future state of the environment and key sustainability issues;
- The SEA Framework of objectives against which the Bridge Neighbourhood Plan has been assessed;
- The appraisal of alternative approaches for the Bridge Neighbourhood Plan;
- The likely significant environmental effects of the Bridge Neighbourhood Plan;
- The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects as a result of the Bridge Neighbourhood Plan; and
- The next steps for the Bridge Neighbourhood Plan and accompanying SEA process.

Assessment of alternative approaches for the Bridge Neighbourhood Plan

The Canterbury Local Plan does not allocate any sites for housing in the Neighbourhood Plan area, or provide a housing number for the Neighbourhood Plan to deliver.

Whilst the Neighbourhood Plan Group recognised that the Bridge Neighbourhood Plan is not required to deliver a significant level of additional housing in the Neighbourhood Plan area, it was viewed that possible options for growth should be explored with the potential aim of supporting the vitality of the parish and helping to meet local housing needs.

To support decision-making on this element of the Bridge Neighbourhood Plan, the SEA process considered three broad options relating to the scale of housing delivery to be taken forward for the purposes of the Neighbourhood Plan. These options were then considered through the SEA Framework of objectives and assessment questions developed during scoping.

- Option 1: Deliver no further growth in association with the minimum requirements of the Canterbury District Local Plan.
- Option 2: Facilitate some growth through the Neighbourhood Plan over the plan period to 2035, amounting to between 30-50 dwellings.
- Option 3: Facilitate significant growth in the Bridge Neighbourhood Plan area in the plan period to 2035 through placing no restrictions on housing numbers.

These three options were then appraised as 'reasonable alternatives' against both the baseline and relatively (i.e. against each other). The findings of the appraisal are presented in Table 4.1 in the main body of the Environmental Report.

A key aim of the Neighbourhood Plan is to ensure that housing delivered in the parish is appropriately located for local needs. To support decision making on this element of the plan, the SEA process has therefore also considered three potential sites for housing in the vicinity of Bridge. This was with a view to exploring the sustainability implications of delivering housing in alternative locations in the parish.

Site Ref.	Location/ description	Site area (ha) ¹	Current land use
Site A	Land east of Bridge, west of the A2	7.44	Playing fields/ recreation, agricultural
Site B	Brickfield Farm	2.22	Agricultural
Site C	Land at Bourne Park Road	2.99	Agricultural

To support the consideration of the suitability of these sites, the SEA process undertook an appraisal of the key environmental constraints present at each of the three sites and potential effects that may arise from new housing development at these locations. Table 4.3 to 4.5 in the main body of the Environmental Report presents the findings of the appraisal.

Following the consideration of alternative levels of growth and where new development should go in the Neighbourhood Plan area, it was considered that the allocation of one site would be appropriate to take forward through the Neighbourhood Plan, on land between the recreation ground and the A2 (reflecting Site A above). 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. 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.

In this context, the site has been allocated primarily due the following reasons:

- 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.

¹ AECOM measurement

- 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.

Assessment of the current version of the Bridge Neighbourhood Plan

The submission version of the Bridge Neighbourhood Plan presents 15 planning policies for guiding development in the Neighbourhood Plan area, grouped under the six objectives of the Neighbourhood Plan.

Utilising the SEA Framework of objectives and assessment questions developed during the earlier scoping stage of the SEA, the SEA process has assessed the policies put forward through the current version of the Bridge Neighbourhood Plan. The Environmental Report has presented the findings of the assessment under the following SEA Themes:

- Biodiversity and geodiversity
- Climate change
- Landscape
- Historic Environment
- Land, Soil and Water Resources
- Population and community
- Health and Wellbeing
- Transportation

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.

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.

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 Patrixbourne / 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.

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.

Next Steps

This SEA Environmental Report accompanies the submission version of the Bridge Neighbourhood Plan. Following submission to the Local Planning Authority, Canterbury City Council, the Neighbourhood Plan and Environmental Report will be publicised for representations.

At subsequent Independent Examination, the Neighbourhood Plan will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with local planning policy.

If the Independent Examination is favourable, the Bridge Neighbourhood Plan will be subject to a referendum, organised by Canterbury City Council. If more than 50% of those who vote agree with the Neighbourhood Plan, then it will be 'made'. Once made, the Bridge Neighbourhood Plan will become part of the Development Plan for the parish.

1. Introduction

Background

- 1.1 AECOM has been commissioned to undertake an independent Strategic Environmental Assessment in support of Bridge's emerging Neighbourhood Plan in Kent.
- 1.2 The Bridge Neighbourhood Plan is currently being prepared as a Neighbourhood Development Plan under the Localism Act 2011 and the Neighbourhood Planning (General) Regulations 2012. The Neighbourhood Plan is being prepared in the context of the Canterbury District Local Plan.
- 1.3 It is currently anticipated that the Neighbourhood Plan will be submitted to Canterbury City Council later in 2020 for subsequent independent examination.
- 1.4 Key information relating to the Bridge Neighbourhood Plan is presented in Table 1.1.

Table 1.1: Key facts relating to the Bridge Neighbourhood Plan

Name of Responsible Authority	Bridge Parish Council
Title of Plan	Bridge Neighbourhood Plan
Subject	Neighbourhood planning
Purpose	The Bridge Neighbourhood Plan is being prepared as a Neighbourhood Development Plan under the Localism Act 2011 and Neighbourhood Planning (General) Regulations 2012. The plan will be in general conformity with the Canterbury District Local Plan.
	The Bridge Neighbourhood Plan will be used to guide and shape development within the Neighbourhood Plan area.
Timescale	То 2035
Area covered by the plan	The Neighbourhood Plan area covers Bridge Parish in Kent, within the administrative boundary of Canterbury City Council.
Summary of content	The Bridge Neighbourhood Plan will set out a vision, strategy and range of planning policies for the Neighbourhood Plan area.
Plan contact point	Jenny Heap, Bridge Parish Clerk
	Email: <u>clerk@BridgeVillage.org.uk</u>

SEA explained

- 1.5 Strategic Environmental Assessment (SEA) is a mechanism for considering and communicating the impacts of an emerging plan, and potential alternatives in terms of key sustainability issues. The aim of SEA is to inform and influence the plan-making process with a view to avoiding and mitigating negative impacts. Through this approach, the SEA for the Bridge Neighbourhood Plan seeks to maximise the plan's contribution to sustainable development.
- 1.6 SEA is undertaken to address the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations) which transpose into national law the EU Strategic Environmental Assessment (SEA) Directive.² It also widens the scope of the assessment from focusing on environmental issues to further consider community issues.
- 1.7 The Bridge Neighbourhood Plan has been screened in by Canterbury City Council as requiring SEA. To meet this requirement, the Neighbourhood Plan is undergoing an SEA process which incorporates the requirements of the SEA Directive.
- 1.8 The SEA will be undertaken to meet specific requirements prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations).
- 1.9 Two key procedural requirements of the SEA Regulations are that:
 - 1. When deciding on 'the scope and level of detail of the information' which must be included in the Environmental Report, there is a consultation with nationally designated authorities concerned with environmental issues; and
 - 2. A report (the 'Environmental Report') is published for consultation alongside the Draft Plan that presents outcomes from the environmental assessment (i.e. discusses 'likely significant effects' that would result from plan implementation and reasonable alternatives).

Structure of this SEA Environmental Report

1.10 This document is the SEA Environmental Report for the Bridge Neighbourhood Plan and hence needs to answer all four of the questions listed below with a view to providing the information required by the SEA Regulations. Each of the four questions is answered in turn within this report, as follows:

What's the What is the plan An outline of the contents and main objectives of the • scope of the seeking to plan. achieve? SEA? What is the Relationship with other relevant plans and programmes. • sustainability The relevant environmental protection objectives, 'context'? established at international or national level. Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance. What is the The relevant aspects of the current state of the • environment and the likely evolution thereof without sustainability 'baseline'? implementation of the plan. The environmental characteristics of areas likely to be . significantly affected. Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance. What are the key • Key problems/issues and objectives that should be a issues and focus of (i.e. provide a 'framework' for) assessment. objectives? What has plan-making / SEA Outline reasons for selecting the alternatives dealt with. involved up to this point? The likely significant effects associated with alternatives. Outline reasons for selecting the preferred approach in-• light of alternatives appraisal/a description of how environmental objectives and considerations are reflected in the current version of the plan. What are the assessment The likely significant effects associated with the draft • findings at this stage? plan. The measures envisaged to prevent, reduce and as fully . as possible offset any significant adverse effects of implementing the submission version of the plan. What happens next? • The next steps for the plan making / SEA process.

Table 1.2: Questions that must be answered by the SEA Environmental Report in order to meet the regulatory³ requirements

2. Local Plan context and vision for the Bridge Neighbourhood Plan

Local Plan context for the Bridge Neighbourhood Plan

- 2.1 The Bridge Neighbourhood Plan is being prepared in the context of the Canterbury Local Plan, which was adopted in July 2017. Neighbourhood plans will form part of the development plan for the district, alongside, but not as a replacement for the Local Plan. The Local Plan seeks to give communities a solid framework within which appropriate community-led planning policy documents, including neighbourhood plans, can be brought forward. Neighbourhood plans are required to be in general conformity with the strategic policies of the Local Plan and can develop policies and proposals to address local place-based issues. In this way it is intended for the Local Plan to provide a clear overall strategic direction for development in Canterbury District, whilst enabling finer detail to be determined through the neighbourhood planning process where appropriate.
- 2.2 The Canterbury District Local Plan outlines a number of key provisions for Bridge⁴:
 - The Rural Settlement Hierarchy classifies Bridge as a Local Centre, with Policy TCL (A) 'Retail Hierarchy and Network' classifying Bridge as a Larger Local Village Centre. Paragraph 1.50 within the Local Plan states: 'it is important and appropriate that the distribution of new housing sites in rural areas reflects such a settlement pattern, and that rural allocations made as part of the Plan are generally small in scale, except in the local centres, where a higher level of development might be supported'.
 - In terms of the future housing need, no specific housing number or site allocations have been outlined for the Neighbourhood Plan area through the Local Plan. Instead, the Local Plan states that 'for all potential development sites which come forward and are not already allocated in the Local Plan, Policy SP4 will be applied'. In this context, Policy SP4 'Strategic approach to location of development' states that the 'provision of new housing that is of a size, design, scale, character and location appropriate to the character and built form of the local centre of Bridge 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'.
 - The Local Plan has identified a strategic development site at South Canterbury for mixed use development, including 4000 dwellings. Access to this site from the A2 near Bridge is difficult, and with the current arrangement, traffic from the proposed development would impact on the A2. As such, the provisions of Policy T12 'A2 Bridge Interchange' states that the provision of a new A2 interchange between near Bridge will be required as 'an integral part of new development proposals'.
 - A new 'green gap' is proposed between Bridge and Canterbury to ensure that the countryside between these areas is protected. In this context, Policy OS6 'Green Gaps' states that development will be permitted where it does not 'significantly affect the open character of the Green Gap, or lead to coalescence between existing settlements' and result in new isolated and obtrusive development within the Green Gap'.

⁴ Canterbury City Council (2017): 'Canterbury District Local Plan', [online] available to download via: <<u>https://www.canterbury.gov.uk/downloads/file/467/canterbury_district_local_plan_adopted_july_2017</u>> last accessed [21/02/18]

Vision for the Bridge Neighbourhood Plan

2.3 Developed in the earlier stages of plan making, the vision for the Neighbourhood Plan states that:

"By 2035 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."

Objectives of the Neighbourhood Plan

2.4 In order to achieve this vision, the Neighbourhood Plan has been constructed around the following six objectives:

Objective A: Building a strong, competitive economy and ensure the vitality of the village centre;

Objective B: Promoting sustainable transport;

Objective C: To maintain a choice of high quality homes with good design;

Objective D: Promoting healthy communities;

Objective E: Meeting the challenges of climate change and flooding and conserving and enhancing the natural environment; and

Objective F: Conserving and enhancing the historic environment.

3. The Scope of the SEA

SEA Scoping Report

- 3.1 The SEA Regulations require that: "When deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies". In England, the consultation bodies are Natural England, the Environment Agency and Historic England.⁵ These authorities were consulted on the scope of the Bridge SEA in May 2017.
- 3.2 The purpose of scoping was to outline the 'scope' of the SEA through setting out:
 - A context review of the key environmental and sustainability objectives of national, regional and local plans and strategies relevant to the Neighbourhood Plan;
 - Baseline data against which the Neighbourhood Plan can be assessed;
 - The key sustainability issues for the Neighbourhood Plan; and
 - An 'SEA Framework' of objectives against which the Neighbourhood Plan can be assessed.
- 3.3 Baseline information (including the context review and baseline data) is presented in Appendix A.
- 3.4 Comments received on the Scoping Report, and how they have been considered and addressed, are presented in Table 3.1.

Table 3.1: Consultation responses received on the SEA Scoping Report

Consultation response	How the response was considered and addressed
Natural England Heather Twizell: Lead Adviser, Sustainable Devel	opment Team (Sussex and Kent)
<i>Biodiversity SEA theme</i> Natural England is pleased to see a comprehensive list of appraisal questions under this theme along with references to enhancement as well as protection. You might wish to revise the green infrastructure appraisal question so that this also covers protection of existing assets as well as enhancements.	Assessment question has been revised, as follows: Supports the protection of and enhancements to multifunctional green infrastructure networks?
<i>Climate Change SEA theme</i> While not particularly relevant to our remit we note that the first appraisal question relating to SEA objective "Support the resilience of the Neighbourhood Plan area to the potential effects of climate change, including flooding" is somewhat oddly worded and something that you may wish to revisit – "Will the option/proposal help to ensure that inappropriate development takes place in areas at higher risk of flooding, taking into account the likely future effects of climate change?" Development inappropriate in what way? Surely one of the aims of the NP is to avoid inappropriate development?	Assessment questions have been revised, as follows: Support the resilience of the Neighbourhood Plan area to all of the potential effects of climate change? Ensure that no inappropriate development takes place in areas at higher risk of flooding, taking into account the likely future effects of climate change?

⁵ In-line with Article 6(3).of the SEA Directive, these consultation bodies were selected because 'by reason of their specific environmental responsibilities,[they] are likely to be concerned by the environmental effects of implementing plans and programme'.'

Consultation response	How the response was considered and addressed
Landscape and Historic Environment SEA theme We are pleased to see impacts on the Kent Downs AONB explicitly covered by one of the appraisal questions in this section. Given that more than half of Bridge Parish, including the main settlement area, is covered by the AONB designation we would strongly encourage you to seek the views of the AONB Unit on the scope of the SEA even if they are not a statutory consultee.	The Kent Downs AONB Unit provided comments on consultation draft 4 of the Neighbourhood Plan in May 2016. Their comments are available to view via the Bridge Neighbourhood Plan website and were considered in the Regulation 14 Consultation Draft and submission versions of the Neighbourhood Plan.
Land, Soil and Water Resources SEA theme Natural England welcomes the inclusion of an appraisal question covering Best and Most Versatile (BMV) agricultural land as in our experience this is a commonly neglected issue.	Comment noted
Health and Wellbeing SEA theme We welcome the focus in this section on improving people's access to green infrastructure and the countryside but currently none of the appraisal questions relate to potential impacts on existing recreational assets (quality and or extent). We suggest adding the following bullet point "Avoid impacts on the quality and extent of existing recreational assets, such as formal or informal footpaths?"	This additional assessment question has been added to the 'Health and Wellbeing' section of the SEA Framework and has been considered in the appraisal of the policies in the draft Neighbourhood Plan (presented in Chapter 5 of this environmental report).

Historic England Robert Lloyd Sweet: Historic Places Adviser, South East

The scope of the SEA should in part be directed by the aspirations of the plan writers in order to ensure it provides evidence and an assessment framework that is appropriate to the nature of the likely significant environmental effects of the plan. We gather from the Neighbourhood Plan website that there may be some consideration of sites for 'organic growth' of the settlement, as well as potential provision of car parking. As such, the scoping report does need to consider the potential of constraints on options for land allocation with a focus on areas that would support organic growth of the settlement. As the plan is at an early stage it is also sensible to gather a broad range of evidence to identify any further environmental issues affecting the area that could be addressed through the plan, or that plan options should avoid contributing to as cumulative effects.

We note that the National Heritage List has been consulted and that the presence of a number of listed buildings identified in addition scheduled monument at Hanging Hill. Features of these designated assets that might helpfully be identified in order to inform policy making include the focus of a large number of listed buildings either side of the High Street - Bridge Hill route, within the conservation area, suggesting an area of particularly high sensitivity for effects on the historic built environment. Similarly, the hill top location of

In line with the SEA regulations, the SEA process has considered a broad range of evidence to identify the potential environmental issues affecting the Neighbourhood Plan area.

The SEA Framework for the 'Landscape and Historic Environment' SEA theme puts forward a variety of assessment questions relating to the significance of locally and nationally important landscape features and heritage assets contained within and/or adjacent to the Neighbourhood Plan area, and were prepared after careful consideration of the available baseline data presented within the SEA Scoping Repot.

The policies contained within the Regulation 14

Consultation response	How the response was considered and
	addressed
the scheduled monument comprising an extensive Anglo-Saxon cemetery including a number of surviving burial mounds, appears to have been chosen for its commanding location in the landscape, which, therefore is considered to be an important element of its significance. Any impacts on its role in the landscape (i.e. affecting its setting) would therefore need be considered carefully, in addition to direct impacts within the scheduled monument area or on other associated archaeological remains in the wider area. The area of the monument is particularly prominent in views from Bourne Park Road.	consultation draft Neighbourhood Plan and submission plan have been appraised against these assessment questions and presented in Chapter 5 of this Environmental Report.
We note that the conservation area is extensive, covering a large part of the Parish, suggesting it has a particularly high value for its historic character and, as such is highly sensitive to change.	Comment noted
We note the comments in the scoping report with regard to non-designated heritage assets. Unfortunately we feel that these lack sufficient precision to provide guidance for plan making. The Historic Environment Record (HER) maintained by the County Council provides the best record of non- designated heritage assets within the neighbourhood plan area. This is highlighted in the National Planning Practice Guidance as an important source of information for Neighbourhood Plans and we would expect it to be reviewed as matter of course in all neighbourhood plan SEA Scoping report where potential site allocations are being considered.	 The 'summary of current baseline' for the 'Landscape and Historic Environment' SEA theme has been updated to reference the Historic Environmental Record (HER) for Kent (presented in Appendix A of this Environmental Report). The assessment questions within the Landscape and Historic Environment section of the SEA Framework have been reviewed and updated to state the following: Conserve and enhance the significance of buildings and structures of architectural or historic interest, both designated and non- designated, and their setting? Support the undertaking of archaeological investigations and, where appropriate, recommend mitigation strategies. Conserve and enhance archaeological remains, including historic landscapes?
A brief search of the HER via the Exploring Kent's Past website http://webapps.kent.gov.uk/KCC.ExploringKentsPas t.Web.Sites.Public/Default.aspx reveals that 101 records refer to historic sites or buildings within the Parish. A total to 44 of these are likely to replicate features on the national heritage list. However, 57 records relate to otherwise non-designated heritage assets. Notable among these are the course of the major Roman road Watling Street, one of the foremost highways of Roman Britain, which, in-fact runs through the heart of the settlement of Bridge and is marked as a Roman road on the Ordnance Survey base map used for the SEA scoping report mapping.	 The 'summary of current baseline' for the 'Landscape and Historic Environment' SEA theme has been updated to reference the Historic Environmental Record (HER) for Kent (presented in Appendix A of this Environmental Report). The assessment questions within the Landscape and Historic Environment section of the SEA Framework have been reviewed and updated to state the following: Conserve and enhance the significance of buildings and structures of architectural or historic interest, both designated and non-designated, and their setting? Support the undertaking of archaeological investigations and, where appropriate, recommend mitigation strategies.

• Conserve and enhance archaeological remains, including historic landscapes?

Consultation response

Bridging points on Roman roads frequently form minor foci of activity and, as such it is likely that the settlement has a high potential for the presence of remains of Roman activity. Records of observation of surviving evidence of the Roman road surface and settlement activity are contained within the HER for a site at High Street, Bridge (Monument record number TR 15 SE 371), whilst a 4th century Romano-British burial site is recorded at Bridge Hill (HER monument number TR 15 SE 7). Aerial photography reveals the evidence of a complex settlement of late Prehistoric or Roman form just to the north west of Bridge at Station Road, depending on its state of preservation this is likely to be considered a site of, at least, regional importance (see attached screen capture of Google satellite imagery). This site is likely to be highly sensitive to harm resulting from development but may also be currently affected by ongoing ploughing, which is likely to have a cumulative negative effect over the long term.

The HER also contains evidence of Bronze Age activity at Star Hill and Bishopsbourne within the Parish. Parts of the parkland of the 17th century estates of Bourne House and Bifrons lie within the south and east of the

parish respectively and would be considered as non-designated heritage assets in their own right. The HER also contains records of a number of military features relating to the defence of Britain in the Second World War.

How the response was considered and addressed

The 'summary of current baseline' for the 'Landscape and Historic Environment' SEA theme has been updated to reference the Historic Environmental Record (HER) for Kent (presented in Appendix A of this Environmental Report).

The assessment questions within the Landscape and Historic Environment section of the SEA Framework have been reviewed and updated to state the following:

- Conserve and enhance the significance of buildings and structures of architectural or historic interest, both designated and nondesignated, and their setting?
- Support the undertaking of archaeological investigations and, where appropriate, recommend mitigation strategies.
- Conserve and enhance archaeological remains, including historic landscapes?

The 'summary of current baseline' for the 'Landscape and Historic Environment' SEA theme has been updated to reference the Historic Environmental Record (HER) for Kent (presented in Appendix A of this Environmental Report).

The assessment questions within the Landscape and Historic Environment section of the SEA Framework have been reviewed and updated to state the following:

- Conserve and enhance the significance of buildings and structures of architectural or historic interest, both designated and nondesignated, and their setting?
- Support the undertaking of archaeological investigations and, where appropriate, recommend mitigation strategies.
- Conserve and enhance archaeological remains, including historic landscapes?

The Scoping Report highlights the potential for development or other change of management resulting from plan policies to have either beneficial or harmful impacts to heritage assets but doesn't provide any indication of what current issues may exist or what opportunities for benefits to heritage assets may be present. We have identified a number of areas with potential sensitivity to change above. Nevertheless, the potential to provide better understanding of the medieval and earlier settlement of Bridge, as well as the archaeology of its surroundings and to make this information available to its residents and visitors is one opportunity we would expect the Scoping report to highlight. The course of the dismantled railway track (Part of the former Elham Valley Line) provides one obvious area that has been identified as having

SEA process has considered all heritage assets and their settings, including nationally and locally listed features, areas designated for the heritage value and areas of interest for archaeology. Archaeology has been considered where the data is available.

As of February 2018, no appraisals and/or management plans have been prepared for the conservation areas which overlap with the Neighbourhood Plan area: including Bridge, Bifrons Park, Renville Farm and Railway Station, and Bourne Park. Following the appraisal of the policies presented in the Regulation 14 Draft Consultation of the Neighbourhood Plan and submission version of the Neighbourhood Plan, it is recommended

Consultation response	How the response was considered and addressed
special interest through its inclusion in the conservation area that could possibly provide benefits through improved access as part of a linked recreational route connecting numerous attractive areas along the Elham Valley.	that the Neighbourhood Plan support the undertaking of appraisals and/or management plans in order to better understand the special qualities of the conservation areas.
The historic focus of settlement within the village follows the single, linear corridor of High Street - Bridge Hill (the former Watling Street), which also acts as the main artery of vehicle movement generated by local need and is used for on-street car parking along several stretches. This creates an area of high sensitivity for the historic environment in a narrow space that also has high demand for traffic. Development resulting in a substantial increase in traffic along this corridor can be predicted to have a harmful impact on the historic environment.	The potential impacts to the historic environment resulting from the proposed site allocation put forward through the Neighbourhood Plan have been considered in Chapter 5 of this Environmental Report.
The village lies within a green valley setting with potential for views from higher ground to the north and south. The village's historic architecture is typified by the use of clay peg tiles on pitched roofs with a general two-storey scale. As such, there is potential for a distinctive appearance of the settlement in its landscape setting, that may be appreciated from the footpath network and which reveals part of its historic and architectural interest. It would be helpful to highlight the potential for impacts on views of the village (in addition to other parts of the conservation area) from its rural setting through inappropriate development.	The potential impacts to the landscape setting resulting from the proposed site allocation put forward through the Neighbourhood Plan have been considered in Chapter 5 of this Environmental Report.

Canterbury District of the Campaign for the Preservation of Rural England Barrie Gore: Chairman

Air Quality

NPPF 124, quoted in 2.2 Policy Context, states that planning policies should take account of the presence of AQMA and the cumulative impacts on air quality from individual sites in local areas. The emerging local plan which has been to examination includes land at Montfield Park for 4,000 homes plus employment uses. This will potentially have an impact on air quality in the City Centre. The application is subject to a Judicial Review to be heard later this year.

Whilst there are no AQMAs within the Neighbourhood Plan area boundary development within the NP area in combination with the Mountfield Park and other major allocations in the emerging local plan could result in a worsening of air quality within the existing Canterbury AQMA as well as result in the need to extend the AQMA along the A2050 and B2068.

This section does not refer to the November 2016 High Court ruling by Mr Justice Garnham (Client Earth). The recent Defra and DforT consultation on 'Tackling nitrogen dioxide in our towns and cities' published in May 2017 at paragraph 2 states 'This The summary of future baseline section of the 'Air Quality' SEA theme has been updated to reference the potential impacts on air quality which might result from other major allocations proposed through the Local Plan, and reads as follows:

Whilst there are no AQMAs within the Neighbourhood Plan area boundary, future development within the Neighbourhood Plan area in combination with the other major housing allocations in the Canterbury District Local Plan could result in a worsening of air quality, particularly along the existing highways network.

However, the goals of improving district-wide sustainable transport options in the most recent Canterbury District Transport Strategy and Canterbury City Council Air Quality Action Plan might lead to improvements in air quality over a wider area'.

Additionally, in the context of the Neighbourhood Plan area the proposed housing numbers do not go against the provisions of the Local Plan. As such, there will

	How the response was considered and addressed
	be no deviance from the findings of the technical studies undertaken for the Local Plan
Biodiversity General point that is enhanced upon below is that Figures 3.1 and 3.2 do not show all the baseline biodiversity sites and should, especially given the statement in 3.3.2 which reads: "Habitats and species have the potential to come under increasing pressures from housing and infrastructure development in the Neighbourhood Plan area, including the nationally and locally designated sites. This includes a loss of habitats and impacts on biodiversity networks" The absence of mapping means that the impact of proposed allocations or development on biodiversity may be overlooked. It will also make it harder to answer the appraisal questions set out in section 3.4 SEA Objectives and appraisal questions SSSI and IBZ	All of the designated sites within and within proximity to the Neighbourhood Plan area are available to view using the publically available MAGIC Interactive Mapping Tool. The SSSI map has been updated to include the four designated sites which are referenced within the SEA Scoping Report (see Appendix A). It is important to note that the Neighbourhood Plan area is not within an IRZ for the type of development which is proposed through the Neighbourhood Plan. The policies within the Neighbourhood Plan have been appraised against the 'Biodiversity and Geodiversity' section of the SEA Framework, with consideration given to all of the designated and non-designated sites within the Neighbourhood Plan area (see Chapter 5 o this Environmental Report).

The first question on 'Support the resilience of the

Ensure that no inappropriate development

Consultation response	How the response was considered and addressed
Neighbourhood Plan' reads 'Ensure that inappropriate development takes place in areas at higher risk of flooding,' This should surely read 'Inappropriate development does not take place in areas of higher risk of flooding.	takes place in areas at higher risk of flooding, taking into account the likely future effects of climate change?
Landscape and Historic Environment Section 5.3.1 on Historic Environment on page 24 states: 'Parts of Bridge are designated a conservation area.' Looking at the emerging local plan Proposals Map, it is more than parts, it is around half of the Neighbourhood Plan area. Three Conservation Areas lie within the area: The Bridge Conservation Area, the Renville Farm and Bridge Railway Station (Bridge) Conservation Area, along with the northern part of the Bourne Park (Bishopsbourne / Bridge) Conservation Area.	 The 'summary of current baseline' in the Landscape and Historic Environment' SEA theme has been updated to reference the three conservation areas (see Appendix A of this Environmental Report). Additionally, the assessment questions in the SEA Framework for the Landscape and Historic Environment SEA theme have been updated to read as follows: Support the integrity, setting and special qualities of the Bridge Conservation Area, the Renville Farm and Railway Station Conservation Area and the Bourne Park Conservation Area?
Landscape and Historic Environment Watling Street runs through the area and it is likely that there could be important archaeology or finds along its course. The KCC Heritage Maps http://webapps.kent.gov.uk/KCC.HeritageMaps.Web .Sites.Public/Default.aspx show a wealth of archaeological sites and finds in the Neighbourhood Plan area and should be referred to in the text and used in assessments.	 The assessment questions within the Landscape and Historic Environment section of the SEA Framework have been reviewed and updated to acknowledge the significance of the locally important heritage assets within the Neighbourhood Plan area, reading as follows: Conserve and enhance the significance of buildings and structures of architectural or historic interest, both designated and non- designated, and their setting? Support the undertaking of archaeological investigations and, where appropriate, recommend mitigation strategies. Conserve and enhance archaeological remains, including historic landscapes?
Landscape and Historic Environment Section 5.4: SEA objectives and appraisal questions: Protect, maintain and enhance the cultural heritage resource: NPPF 128 states: 'In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting.' The second assessment question is 'Support the integrity of the historic setting of key buildings of cultural heritage interest?' There is no explanation of what 'key building' means. The assessment question would preclude listed buildings and heritage assets and their setting not deemed to be a 'key building' contrary to the NPPF and emerging local plan policies HE1 Historic Environment and Heritage Assets, and HE4 Listed Buildings. The assessment question needs to be amended to read 'Support the integrity of the historic setting heritage assets?'	 The second assessment question within the Landscape and Historic Environment section of the SEA Framework has been amended to read as follows: Support the integrity and the historic setting of both designated and non-designated buildings and structures of architectural or cultural heritage interest?

How the response was considered and

addressed

Consultation response

	addressed
Landscape and Historic Environment Section 5.4: SEA objectives and appraisal questions: Protect, maintain and enhance the cultural heritage resource: The third assessment question relates to the Bridge Conservation Area. There are three Conservation Areas in the Neighbourhood Plan area: The Bridge Conservation Area, the Renville Farm and Bridge Railway Station (Bridge) Conservation Area, along with the northern part of the Bourne Park (Bishopsbourne / Bridge) Conservation Area. They should all be referred to. The emerging local plan policy HE6 Conservation Areas in the second paragraph states: 'Development, in or adjoining a conservation area, which would harm its character, appearance, or setting will not normally be permitted.' The assessment question needs to be amended to read: 'Support the integrity of the Conservation Areas and their setting?	 The 'summary of current baseline' in the Landscape and Historic Environment' SEA theme has been updated to reference the three conservation areas (see Appendix A of this Environmental Report). Additionally, the assessment questions in the SEA Framework for the Landscape and Historic Environment SEA theme have been updated to read as follows: Support the integrity, setting and special qualities of the Bridge Conservation Area, the Renville Farm and Railway Station Conservation Area?
Landscape and Historic Environment Section 5.4: SEA objectives and appraisal questions: Protect and enhance the character and quality of landscapes and townscapes. Trees and hedgerows add quality to the environment and may reflect ancient field boundaries, or be protected by individual or group Tree Preservation Orders. It would be helpful for the first question to be amended to read:' Conserve and enhance landscape and townscape features, including trees and hedgerows? Additionally, emerging local plan policy LB1 Kent Downs AONB in the first paragraph reads:' High priority will be given to conservation and enhancement of natural beauty in the Kent Downs AONB and planning decisions should have regard to its setting.' Given the policy approach the second assessment question should be amended to read: 'Support the integrity of the Kent Downs AONB and its setting.'	 The assessment questions within the Landscape and Historic Environment section of the SEA Framework have been reviewed and updated to read as follows: Conserve and enhance landscape and townscape features, including trees and hedgerows? Support the integrity of the Kent Downs AONB and its setting?
Land, Soil and Water Resources The section refers to agricultural land classification, Groundwater Nitrate Vulnerable Zone, Groundwater Source Protection Zones which are not mapped and referred to in the assessment questions. The absence of mapping will make it harder to answer the appraisal questions and for members of the public considering the reasonableness of any assessments in subsequent stages of the SEA process.	The locations of NVZs and groundwater SPZs are identifiable from the publically available interactive mapping service provided by the Environment Agency.
Population and Community Tables 7.1 to 7.3: it would be helpful to provide the data for rural Canterbury (the parishes outside Canterbury and Herne Bay / Whitstable urban areas) as this would help understand if the changes in Bridge reflect the Canterbury rural area as a	The 'summary of current baseline' commentary for the 'household deprivation' section in the Population and Community SEA theme has been updated accordingly (see Appendix A of this Environmental Report). The SEA process has considered the Census

whole – that is are common to rural parishes. The commentary on table 7.2 Age Structure does not pick up that the 0-15 age group is higher than Canterbury and in line with SE and England. Commentary on Table 7.3 Relative household deprivation dimensions in the last sentence refers to the South East and I wonder if it should be Bridge?

7.4 SEA Objectives and appraisal questions. The third objective is to provide everyone with the opportunity to live in good quality, affordable housing and ensure an appropriate mix of dwelling sizes, types and tenures.' It is not clear who 'everyone' is. Is it those people identified by a Parish Housing Needs Survey as needing to live in Bridge, or anyone who wishes to live there? The emerging local plan does not allocate any sites for housing in the Neighbourhood Plan area. The objective needs clarifying.

Section 9.1 refers to the area being well served by

There is no reference to A2050 (New Dover Road)

or the park and ride which give more direct access

Census data relates solely to travel to work. It does

not address matters such as how the retired, travel

to shop, nor how school children travel to school.

as the fourth question asks if an option / proposal

would facilitate working from home and remote

The assessment questions could benefit from a question that considers these groups of people, just

road, with the A2 providing access to Canterbury.

How the response was considered and addressed

statistics for the Neighbourhood Plan area in relation to the trends at the local authority level, regional level and national level.

The third SEA objective within the Population and Community section of the SEA Framework has been updated to read as follows:

• To provide current and future residents in the Neighbourhood Plan area with the opportunity to live in good quality, affordable housing and ensure an appropriate mix of dwelling sizes, types and tenures.

The SEA process has considered the most recently available Census statistics for the Neighbourhood Plan area in relation to the trends at the local authority level, regional level and national level.

The 'summary of current baseline' section for the Transportation SEA theme has been updated to reference the A2050 (New Dover Road) and the Park and Ride facility connecting Bridge to Canterbury City Centre. The assessment questions within the

Transportation section of the SEA Framework have been updated to read as follows:

- Encourage modal shift to more sustainable forms of travel for all residents?
- Enable sustainable transport infrastructure enhancements for all residents?

Environment Agency

Transportation

to the city centre?

workina.

No comments received

Key Sustainability Issues

3.5 Drawing on the review of the sustainability context and baseline, the SEA Scoping Report was able to identify a range of sustainability issues that should be a particular focus of SEA. These issues are as follows, presented by eight SEA themes.

Air Quality

- There are no Air Quality Management Areas (AQMAs) in the Neighbourhood Plan area.
- The nearest AQMA is located in the centre of Canterbury, approximately 5 km to the northwest.
- Future development within the Neighbourhood Plan area has the potential to increase traffic along the main routes through Bridge, particularly Bridge Road, Station Road and Bridge Hill.
- Due to the absence of significant air quality issues within the Neighbourhood Plan area, air quality has been scoped out for the purposes of the SEA process.
- Biodiversity and Geodiversity
- Four SSSIs are located in the vicinity of the Neighbourhood Plan area: Ileden and Oxenden Woods SSSI (to the east); Chequer's Wood and Old Park SSSI (to the north); Larkey Valley Wood SSSI (to the west); and Lysnore Bottom SSSI to the south.
- The northern section of the Neighbourhood Plan area is located within a SSSI Impact Risk Zone (IRZ) for the Chequer's Wood and Old Park SSSI.
- There are two Local Wildlife Sites (LWS) within the Neighbourhood Plan area: Whitehill Wood and Lower Hardres, and the River Nail Bourne. There is also a LWS directly adjacent to the southern border of the Neighbourhood Plan area, Gorsley Wood.

Climate Change

- Fluvial flooding and surface water drainage flooding are an issue for the Neighbourhood Plan area, including associated with the presence of the Nail Bourne. These risks have the potential to increase as a result of land use change and climate change.
- The most recent Strategic Flood Risk Assessment for Canterbury City Council identified no Critical Drainage Areas within the Neighbourhood Plan area.
- Canterbury District has recorded consistently lower greenhouse gas (GHG) emissions per capita in comparison to the regional and national averages.

Landscape

- The Neighbourhood Plan area has a distinctive landscape and villagescape character
- Over half of the Neighbourhood Plan area falls within the nationally designated Kent Downs Area of Outstanding Natural Beauty.
- The Neighbourhood Plan area is located within the North Downs National Character Area

Historic Environment

- The Neighbourhood Plan area has a rich historic environment, including two Grade II* listed buildings, 41 Grade II listed buildings and one scheduled monument nationally designated for their cultural heritage resource.
- Three conservation areas present in the Neighbourhood Plan area. No Conservation Area Appraisal and/or Management Plan have been prepared for these conservation areas.
- The Historic Environment Record (HER) for Kent contains details of over 100 locally important heritage assets in the Neighbourhood Plan area reflecting features from a range

of periods. Notable amongst these is the course of 'Watling Street', which is one of the foremost highways of Roman Britain.

• The Neighbourhood Plan area has a rich archaeological resource.

Land, Soil and Water Resources

- An agricultural land classification assessment has been undertaken in certain parts of the Neighbourhood Plan area, with both Grade 1 ('excellent') and Grade 2 ('very good') agricultural land present.
- Most parts of the Neighbourhood Plan area are designated as a Groundwater Nitrate Vulnerable Zone (NVZ).

Population and Community

- Based on the most recent census data available (2011), the population increase within the Neighbourhood Plan area is in keeping with the trends for the South East and England. However, it is 4.3% less than the population increase for Canterbury District.
- There is an ageing population within the Neighbourhood Plan area, with 37% of residents being over the age of 60, significantly higher than the averages for Canterbury District (25.2%), the South East (23.3%) and England (22.3%).
- Within the Neighbourhood Plan area, there is also a significantly lower percentage of under 24 year old residents (26.6%) relative to Canterbury District (35.1%), the South East (30.2%) and England (30.8%).
- Households within the Neighbourhood Plan area are relatively not deprived (50.6%) in comparison to the local, regional and national averages.
- The majority of residents within the Neighbourhood Plan area own a household either outright or by mortgage (72.6%) at a higher rate than the local, regional and national averages.
- Within the Neighbourhood Plan area, the largest employment sector are Professional occupations (22.8%), which aligns with the high percentage of Level 4 Qualifications among residents (36.5%), both at a higher rate than the local, regional and national averages.

Health and Wellbeing

- The majority of residents within the Neighbourhood Plan area consider themselves to have 'very good health' or 'good health', however at a lower percentage in comparison to the local, regional and national average.
- 6.5% of residents within the Neighbourhood Plan area consider themselves as having 'bad health' or 'very bad health', which is slightly higher than the local, regional and national average.
- 21.8% of residents within the Neighbourhood Plan area consider their activities limited to some degree, notably higher than the local, regional and national average.
- The relatively low percentage of residents with 'very good health' and 'good health' aligns with the higher percentage of residents that consider their activities to be limited. With a high number of residents in the Neighbourhood Plan area also being 60+ in age, it can be inferred that age may be factor in lowering health and activity figures.

Transportation

• The Neighbourhood Plan area is well served by road, with the A2 providing access to Canterbury and the M2 to the north and Dover to the south.

- There are no railway stations with the Neighbourhood Plan area. The closest station is located c.2km north-east of Bridge village, providing access to Canterbury and Dover. Within Canterbury, two railway stations provide services to the rest of Kent and to London.
- A relatively high percentage of residents within the Neighbourhood Plan area have two or more cars or vans (48.3%), significantly higher than district, regional and national averages.
- Driving in a car or van is most popular method of transport to work (46.3%).

SEA Framework

3.6 The issues were then translated into an 'SEA Framework'. This SEA Framework provides a methodological framework for the appraisal of likely significant effects on the baseline. The SEA framework for the Bridge Neighbourhood Plan is presented below, excluding the Air Quality SEA theme which has been scoped out due to the absence of any significant issues.

Table 3.2: SEA Framework for the Bridge Neighbourhood Plan

SEA Objective	Assessment questions: will the option/proposal help to…
Biodiversity and Geodiver	sity
	 Protect and support the integrity of the SSSIs present in the wider vicinity of the Neighbourhood Plan area? Protect and enhance the local sites of wildlife importance within the Neighbourhood Plan area, including Whitehill Wood and Lower Hardres LWS and the River Nail Bourne LWS? Protect and enhance semi-natural habitats? Protect and enhance priority habitats, and the habitat of priority species? Achieve a net gain in biodiversity? Supports the protection of and enhancements to multifunctional green infrastructure networks? Support access to, interpretation and understanding of biodiversity and geodiversity?
Climate Change	
contribution to climate change made by activities within the Neighbourhood Plan area	 Promote the use of sustainable modes of transport, including walking, cycling and public transport? Increase the number of new developments meeting or exceeding sustainable design criteria? Generate energy from low or zero carbon sources? Reduce energy consumption from non-renewable resources?
Landscape	
Protect and enhance	Support the integrity of the Kent Downs AONB and its setting?

enhance the cultural heritage resource within the Neighbourhood Plan sea, including the heighbourhood Plan area, including the heighbourhood Plan area, including the heighbourhood Plan area, including the formatic environment? Support access to, interpretation and understanding of the historic environment? Conserve and enhance local diversity and character? Support access to, interpretation and understanding of the historic environment? Support access to, interpretation and understanding of the historic environment? Support access to, interpretation and understanding of the historic environment? Support access to, interpretation and understanding of the historic environment? Support access to, interpretation and understanding of the historic environment? Support access to, interpretation and understanding of the historic environment? Support access to interpretation and understanding historic landscapes? Land, Soil and Water Resources Ensure the efficient and effective use of land. Will the option/proposal help to: Promote sustainable waste management solutions that recourage the reduction, re-use and manage export of waste to areas outside? Use and manage water. Will the option/proposal help to: Promote the use option fust to areas outside? Use and manage water consumption? Use and manage water divide the option/proposal help to: Protect groundwater resources? Population and Community Cater for existing and and inprove for a range of high quality, accessible community, and improve access to local popelia in community accessibility of key local facilities, including specialities exices for disable and older people? Support the provision of land for allotments and cemeteries?	SEA Objective	Assessment questions: will the option/proposal help to
and townscapes. • Support the integrity and the historic setting of both designated and non-designated buildings and structures of architectural or cultural heritage resource within the Neighbourhood Plan • Mistoric Environment • Support the integrity, setting and special qualities of the Bridge conservation Area, the Renville Farm and Railway Station Conservation Area and the Benville Farm and Railway Station • Support the integrity, setting and special qualities of the Bridge conservation Area and the Benville Farm and Railway Station • Conserve and enhance local diversity and character? • Support the undertaking of archaeological investigations and, where appropriate, recommend mitigation strategies. • Conserve and enhance archaeological remains, including historic landscapes? Land, Soil and Water Resources Ensure the efficient and effective use of land. Will the option/proposal help to: • Promote sustainable meanement solution of the Neighbourhood Plan area may comprise Grade 1 and 2 agricultural land? • Will the option/proposal help to: • Reduce the amount of waste produced? • Support the iniminisation, reuse and recycling of waste? • Maximise oportunities for local management of waste in order to minimise export of waste to areas outside? • Support the provements to water quality? • Will the option/proposal help to: • Reduce the amount of waste produced? • Waithise opportunities for local manageme		
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	inclusive and self- contained community.	

SEA Objective	Assessment questions: will the option/proposal help to
Neighbourhood Plan	Support enhancements to the current housing stock?
area with the	 Meet the needs of all sectors of the community?
opportunity to live in good quality, affordable	 Provide quality and flexible homes that meet people's needs?
housing and ensure an appropriate mix of	 Promote the use of sustainable building techniques, including use of sustainable building materials in construction?
dwelling sizes, types and tenures.	 Provide housing in sustainable locations that allow easy access to a range of local services and facilities?
Health and Wellbeing	
Improve the health and	Will the option/proposal help to:
wellbeing residents within the	 Promote accessibility to a range of leisure, health and community facilities, for all age groups?
Neighbourhood Plan area.	 Provide and enhance the provision of community access to green infrastructure, in accordance with Accessible Natural Greenspace Standards?
	• Avoid impacts on the quality and extent of existing recreational assets, such as formal or informal footpaths?
	Reduce noise pollution?
	Promote the use of healthier modes of travel?
	 Improve access to the countryside for recreational use?
Transportation	
Promote sustainable	Will the option/proposal help to…
transport use and reduce the need to	 Reduce the need to travel through sustainable patterns of land use and development?
travel.	 Encourage modal shift to more sustainable forms of travel for all residents?
	 Enable sustainable transport infrastructure enhancements for all residents?
	Facilitate working from home and remote working?
	Improve road safety?
	 Reduce the impact on residents from the road network?

4. Assessment of reasonable alternatives for the Neighbourhood Plan

Introduction

- 4.1 A key element of the SEA process is the appraisal of 'reasonable alternatives' for the Bridge Neighbourhood Plan. The SEA Regulations⁶ are not prescriptive as to what constitutes a reasonable alternative, stating only that the Environmental Report should present an appraisal of the 'plan and reasonable alternatives taking into account the objectives and geographical scope of the plan'.
- 4.2 In accordance with the SEA Regulations the Environmental Report must include...
 - An outline of the reasons for selecting the alternatives dealt with; and
 - The likely significant effects on the environment associated with alternatives / an outline of the reasons for selecting the preferred approach in light of alternatives appraised.
- 4.3 The following sections therefore describe how the SEA process to date has informed the preferred development strategy for the Neighbourhood Plan area and potential locations for development. Specifically, this chapter explains how the Neighbourhood Plan's development strategy has been shaped through considering alternative approaches for the quantum of housing to deliver through the Neighbourhood Plan, and the potential location of development.

Assessment of housing delivery options

- 4.4 The Canterbury District Local Plan was adopted in July 2017 and provides strategic planning policy for Canterbury District.
- 4.5 A number of key provisions are set out for Bridge in the adopted version of the Local Plan, as follows:
 - The Rural Settlement Hierarchy classifies Bridge as a Local Centre, with Policy TCL (A) 'Retail Hierarchy and Network' classifying Bridge as a Larger Local Village Centre;
 - The provisions of Policy T12 'A2 Bridge Interchange' states that the provision of a new A2 interchange between near Bridge will be required as 'an integral part of new development proposals';
 - A new 'green gap' is proposed between Bridge and Canterbury to ensure that the countryside between these areas is protected; and
 - Provision of new housing that is of a size, design, scale, character and location appropriate to the character and built form of Bridge 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.
- 4.6 The Local Plan does not however allocate any sites for housing in the Neighbourhood Plan area, or provide a housing number for the Neighbourhood Plan to deliver.
- 4.7 To support the development of the Neighbourhood Plan, a housing needs assessment was undertaken in July 2017. This highlighted that there was a need in the parish for eleven affordable homes; five of which are for older households. In addition there is a requirement for

⁶ Environmental Assessment of Plans and Programmes Regulations 2004

five open market properties suitable for older households who want to downsize/move to more suitable housing for their needs. $^7\,$

- 4.8 Whilst the Neighbourhood Plan Group recognised that the Bridge Neighbourhood Plan is not required to deliver a significant level of additional housing in the Neighbourhood Plan area, it was viewed that possible options for growth should be explored. This was with the view to helping to meet local housing needs and providing an element of certainty as to the future location of development in the parish over the plan period.
- 4.9 To support decision-making on this element of the Bridge Neighbourhood Plan, the SEA process initially considered three broad options relating to the scale of housing delivery to be taken forward for the purposes of the Neighbourhood Plan. These options were then considered through the SEA Framework of objectives and assessment questions developed during scoping.
- 4.10 The three options are as follows:
 - **Option 1**: Deliver no further growth in association with the minimum requirements of the Canterbury District Local Plan. Recognising that there is no requirement to deliver additional housing in the parish, this option would only allow very limited development within the parish over the plan period.
 - **Option 2:** Facilitate some growth through the Neighbourhood Plan over the plan period to 2035, amounting to between 30-50 dwellings. This option would deliver limited housing growth in the parish during the plan period, with the aim of delivering the affordable housing need identified in the 2017 Housing Needs Survey.
 - **Option 3:** Facilitate significant growth in the Bridge Neighbourhood Plan area in the plan period to 2035 through placing no restrictions on housing numbers. This would deliver additional growth of over 50 dwellings during the plan period.
- 4.11 **Table 4.1** presents the findings of the appraisal of Option 1 to Option 3 outlined above. To support the assessment findings, the options have been ranked in terms of their sustainability performance against the relevant theme. It is anticipated that this will provide the reader with a likely indication of the comparative sustainability performance of the three options in relation to each theme considered.

⁷ Action with Communities in Rural Kent (July 2017) Bridge Housing Needs Survey <u>https://thebridgeplan.co.uk/wp-content/uploads/2019/11/Housing-Needs-Survey-Report-2017.pdf</u> [accessed 5th March 2020]

Table 4.1: Appraisal findings: reasonable alternatives for housing delivery options

Option 1: Deliver no further growth in association with the minimum requirements of the Canterbury District Local Plan. **Option 2:** Facilitate some growth through the Neighbourhood Plan over the plan period to 2035, amounting to between 30-50 dwellings.

SEA Theme	Discussion of potential effects and relative merits of options	Rank of preference		
		Opt 1	Opt 2	Opt 3
Biodiversity and geodiversity	In terms of biodiversity constraints in the vicinity of Bridge, the village and surrounding area is not within an SSSI Impact Risk Zone for the types of development with the potential to be taken forward through the Neighbourhood Plan. As such, no significant effects are anticipated on nationally designated sites. In terms of other biodiversity constraints, significant areas of Woodpasture and Parkland BAP Priority Habitat are present to the south of the village, interspersed with smaller areas of Deciduous Woodland BAP Priority Habitat scattered across the parish. A significant number of habitats in the vicinity of the village have the potential to be home to Priority Species.	1	2	3
	In this context the delivery of a higher level of development in Bridge has the potential to result in an increased negative effect on biodiversity in and around the village. This includes through loss of habitats, ecological connections and key landscape features of biodiversity value. As such, Option 3 has increased potential to lead to negative impacts on biodiversity when compared to Option 1 and 2.			
	It should be noted though that a larger scale of housing delivery may increase opportunities for biodiversity enhancements in the Neighbourhood Plan area, such as through green infrastructure improvements and also enhancements to ecological networks through developer led contributions.			
	All allocations have the potential to have a negative effect on biodiversity assets if located inappropriately or have poor design and layout. Likewise, all allocations have the potential to promote net gains in biodiversity value (if appropriate measures are agreed with developers). Therefore, the potential effects on biodiversity will vary depending on the specific site plans and developer-led contributions. The introduction of the Environment Bill, which seeks to implement a new duty for developers to deliver ten per cent net biodiversity gain in new schemes, is also a consideration in the longer term. However, whilst bearing this inherent uncertainty in mind, it is considered that an increased level of housing delivery in the Neighbourhood Plan area has additional potential to result in negative impacts on the parish's biodiversity resource in the short and medium term through impacting on established habitats and ecological networks.			

Option 2: Facilitate some growth through the Neighbourhood Plan over the plan period to 2035, amounting to between 30-50 dwellings.

SEA Theme	Discussion of potential effects and relative merits of options		Rank of preferen		
		Opt 1	Opt 2	Opt 3	
Climate change	In terms of climate change mitigation, the options which facilitate an increased level of development (Option 3, and to a lesser extent, Option 2) will lead to an increased level of greenhouse gas emissions due to an enlarged built footprint of the parish.	1	2	3	
	Option 3, through facilitating larger scale sites, may however enable more effective improvements to walking and cycling and public transport links through the infrastructure opportunities afforded by larger allocations. Overall however, Option 3 is likely to lead to the largest increases in emissions of the options through facilitating additional growth.				
	In terms of climate change adaptation, enhancements to the Neighbourhood Plan area's green infrastructure networks will be a key means of helping the plan area adapt to the effects of climate change. This includes through helping to regulate extreme temperatures and regulate surface water run-off. In this respect the direct provision of green infrastructure improvements to accompany new development areas may be more achievable through the development proposed through Options 2 and 3, including through mechanisms such as the community infrastructure levy.				
	In terms of flood risk, fluvial flooding and surface water drainage flooding are an issue for the Neighbourhood Plan area. This includes in the area adjacent to the Nail Bourne. This has the potential to increase as a result of land use change and climate change. Whilst it is considered that the provisions of the NPPF and national policy will help guide development away from flood risk areas, and help ensure that appropriate mitigation measures are implemented, new development taken forward through Option 2 and 3 would need to be carefully sited and managed to reflect local flood risk issues.				
Landscape	Over half of the Neighbourhood Plan area is within the Kent Downs AONB, including all of the built up part of the village. As such, all development taken forward through the Neighbourhood Plan has the potential to impact on the special qualities and setting of the AONB without appropriate design and layout.	1	2	3	
	Through increasing the scale of development to be taken forward in Bridge for the purposes of the Neighbourhood Plan, Option 3, and to a lesser extent, Option 2, have the potential to lead to significant impacts on landscape character in the area. This includes through potentially facilitating major development within the AONB. Potential impacts include through loss of landscape features, visual impacts and impacts on noise quality linked to increased traffic flows. In this context Option 1, through limiting development, is less likely to lead to significant effects on landscape and villagescape character in Bridge. Impacts however depend on the specific location of development, design measures and the integration of appropriate green infrastructure provision within new development areas. In this respect there is the potential for Option 2 to limit potential effects through appropriate location, high quality design and the provision of new planting and open space provision.				

Option 2: Facilitate some growth through the Neighbourhood Plan over the plan period to 2035, amounting to between 30-50 dwellings.

SEA Theme	Discussion of potential effects and relative merits of options		Rank of preferen		
		Opt 1	Opt 2	Opt 3	
Historic Environment	The Neighbourhood Plan area has a rich historic environment, as highlighted by the significant number of listed buildings in the parish and the presence of the Bridge Conservation Area and the Bifrons Park (Bekesbourne with Patrixbourne/ Bridge) Conservation Area.	1	2	3	
	In this respect an increased level of development through Option 3, and to a lesser extent, Option 2, has larger potential to lead to significant impacts on the fabric and setting of the historic environment.				
	Options 2 and 3 increase opportunities for supporting the reuse and rejuvenation of existing heritage assets in the Neighbourhood Plan area. This will support the settlement's historic environment resource, if high quality design and layout is incorporated within new provision. Of the two options however, Option 2 provides more of a balance between providing opportunities to rejuvenate existing underutilised heritage assets and protecting villagescape character, visual amenity and the setting of the historic environment.				
Land, Soil and Water Resources	Options 2 and 3, which will deliver additional new housing in the Neighbourhood Plan area, have the potential to facilitate development on greenfield land in the vicinities of the settlement. Whilst recent detailed agricultural land classification has not been carried out in the Neighbourhood Plan area, the options have increased potential to lead to the loss of areas of the Best and Most Versatile Agricultural land present in the area (including, potentially Grade 1 and 2 agricultural land). Therefore, due to the likelihood for increased landtake, Option 3 has increased potential to lead to the loss of productive agricultural land.	1	2	3	
	However, additional delivery of housing through the Neighbourhood Plan may also increase the likelihood of rejuvenating areas of brownfield land in the village. Whilst such areas are very limited in the parish, Option 2 may enable a scale of development which leads to increased opportunities for rejuvenating underutilised land, whilst also not leading to the significant loss of greenfield land. Given the limited availability of previously developed land in the village however, Option 2 remains likely though to lead to the loss of greenfield land.				
	In terms of water quality, it is difficult to come to a conclusion regarding the potential for development at any given location to result in negative effects without an understanding of the design measures that will be put in place. For example, sustainable drainage systems – SuDS – are an effective means of minimising surface water runoff and hence pollution. However, it should be noted that there is likely to be more scope for the implementation of measures such as SuDS within the larger scale of development promoted by Options 2 and 3.				

Option 2: Facilitate some growth through the Neighbourhood Plan over the plan period to 2035, amounting to between 30-50 dwellings.

SEA Theme	Discussion of potential effects and relative merits of options		Rank of preference		
		Opt 1	Opt 2	Opt 3	
Population and community	In terms of affordable housing, such provision may be easier to deliver through the allocations delivered through Option 3. Whilst all new developments involving one or more dwellings are liable for the community infrastructure levy, concentrating the delivery of housing at larger sites may help enable the securing of additional contributions to site specific mitigation through Section 106 planning agreements (it should be noted however that such contributions are typically required to make a development proposal acceptable in planning terms that would not otherwise be acceptable).	3	1	2	
	The small sites affordable housing contributions policy was introduced by the UK Government in November 2014 to help boost housing delivery and incentivise brownfield development. It introduced a national threshold of ten units or fewer (and a maximum combined gross floor space of no more than 1,000 square metres) beneath which affordable housing contributions should not be sought. Within AONBs, the exemptions would apply only to developments not exceeding 5 new homes; developments of 6 to 10 homes could pay a commuted sum, either at or after completion of the development. The policy was introduced to address the burden of developer contributions on small scale developers, custom and self-builders. In this context both Options 2 and 3 provide opportunity for delivering affordable housing in the village, and as such will help meet local housing needs.				
	In terms of the provision of services and facilities, the delivery of CIL monies and similar mechanisms are likely to be more achievable through the allocations facilitated through Options 2 and 3. Similarly, potential enhancements to the vitality of the village provided by an increased population growth through these options may support the availability and viability of services, facilities and amenities and public transport links.				
	Conversely however, larger scale development may have effects on the setting and character of the area and increase pressures on local services. On balance, and in light of the fact that there is no requirement for significant growth in the village through the Local Plan, Option 2 has more potential to provide the level of growth to facilitate housing delivery which will meet local needs, support existing services, facilities, and community vitality, whilst also enabling the impact of growth to be effectively managed.				
Health and Wellbeing	Options 2 and 3 have the potential to deliver green infrastructure, community amenities and walking and cycle enhancements through new development areas which have the potential to support the health and wellbeing of residents.	1	2	3	
	The delivery of housing provision through larger scale allocations however has the potential to concentrate effects on road safety and noise quality from increased traffic flows at certain locations. This may have effects on the health and wellbeing of residents. Impacts however depend on the location of new development areas and the integration of elements such as sustainable transport and green infrastructure provision. In this respect Option 2 may provide a balance between delivering new community infrastructure which supports health and wellbeing and limiting the impacts on the quality of life of residents from new development.				

Option 2: Facilitate some growth through the Neighbourhood Plan over the plan period to 2035, amounting to between 30-50 dwellings.

Option 3: Facilitate significant growth in the Bridge Neighbourhood Plan area in the plan period to 2035 through placing no restrictions on housing numbers.

SEA Theme	Discussion of potential effects and relative merits of options		Rank of preference		
		Opt 1	Opt 2	Opt 3	
Transport	The provision of an increased level of housing through Option 3 has the potential to increase congestion issues in the village. However, the provision of new and improved sustainable transport infrastructure to accompany new housing development, including pedestrian/cycle and public transport links may be more feasible with the larger scale of development proposed through the option. In this respect, Option 1 is unlikely to deliver significant local transport infrastructure enhancements in the village.	3	1	2	
	Option 2, through promoting smaller scale housing provision across the plan area, has increased potential to facilitate the development of new housing at locations which are more integrated with the existing built up area of the village. This has the potential to allow at some locations easier access to services and facilities by public transport and walking and cycling. It will also do less to increase congestion issues than Option 3.				

Conclusion

The assessment has concluded that Option 3 has the most potential to lead to significant negative effects in relation to the Biodiversity, Landscape, Historic Environment and Land, Soil and Water Resources SEA themes. This is given the additional level of development proposed through the option has an additional likelihood of leading to impacts on habitats and ecological networks, landscape character (including associated with the special qualities of the AONB), the fabric and setting of the historic environment and productive agricultural land. It also has increased potential to contribute to congestion issues, noise quality issues, and increase pressures on community facilities and infrastructure. Option 1, through facilitating no additional growth in the Bridge, is likely to limit these effects. It should be noted though that Option 3 has most potential to deliver additional levels of housing and community infrastructure. In this respect Option 1 is less likely to deliver housing which meets Bridge's housing needs (as established by the housing needs surveys undertaken for the Neighbourhood Plan). Option 3 also has the most potential to deliver new and enhanced community facilities and green infrastructure provision, which would be expected to be delivered alongside new development.

In this respect, Option 2 has increased scope to provide a balance between delivering housing and infrastructure, securing enhancements to amenities, whilst limiting potential significant effects on the local environment, if new community infrastructure and green infrastructure provision is delivered alongside new development. The effectiveness of the option would however depend on the design and layout of development, the delivery of new infrastructure, and the integration of avoidance, mitigation and enhancement measures to support the quality of the local environment.

Assessment of site allocation options

- 4.12 As discussed above, the housing need surveys undertaken to inform the Neighbourhood Plan identified a need for in the region of eleven affordable homes to be delivered in the parish during the plan period.
- 4.13 To deliver this provision, there would be a need to deliver in the region of 40 homes. This is given the requirements of the Canterbury Local Plan, which specifies that the City Council will seek provision of 30% affordable housing on all residential developments consisting of eleven or more units, or which have a combined gross floor area of more than 1,000 square metres (Policy HD2 Affordable Housing).
- 4.14 In response to this, the Neighbourhood Plan Steering Group considered that it would potentially support this provision if an appropriate single site could be identified whereby new community provision could be delivered alongside new housing. This would reflect responses to community consultation undertaken for the Neighbourhood Plan to date, which has highlighted a desire for enhanced community facilities to be delivered in Bridge.
- 4.15 In light of the potential aim to deliver in the region of 40 dwellings and community infrastructure on a single site, alternative locations in the vicinity of Bridge village for delivering this provision were explored.
- 4.16 In late 2019 an independent and objective site assessment was undertaken on behalf of the Neighbourhood Plan Steering Group.⁸ This identified potential sites for allocation from the following:
 - Canterbury City Council's (CCC's) Strategic Housing Land Availability Assessment (SHLAA) report (2014);
 - CCC's SHLAA review report (2015);
 - CCC's New Site Submissions report (2016); and
 - Bridge Parish Council's Call for Sites (2019).
- 4.17 From a potential longer list of six sites, three sites were taken forward for the detailed site assessment on the basis of availability and suitability considerations. These all have the capacity to deliver in the region of 40 homes and community infrastructure.
- 4.18 The sites are as follows:

Table 4.2: Details of sites assessed

Site Ref.	Location/ description	Site area (ha) ⁹	Current land use
Site A	Land east of Bridge, west of the A2	7.44	Playing fields/ recreation, agricultural
Site B	Brickfield Farm	2.22	Agricultural
Site C	Land at Bourne Park Road	2.99	Agricultural

4.19 The locations of these sites are presented in Figure 4.1 overleaf.

⁸ AECOM (January 2020) Bridge Neighbourhood Plan, Site Options and Assessment ⁹ AECOM measurement



Figure 4.1: Location of sites assessed

- 4.20 To support the consideration of the suitability of these sites for allocation, the SEA process has undertaken a separate appraisal of the key environmental constraints present at each of the three sites and potential effects that may arise from the delivery of c.40 homes and community infrastructure. In this context the sites have been considered in relation to the SEA Framework of objectives and assessment questions developed during SEA scoping and the baseline information.
- 4.21 The tables below present the appraisal, and provide an indication of each site's sustainability performance in relation to the eight SEA themes, without the application of avoidance and mitigation measures.

SEA site assessment findings

Table 4.3: Site A, Land east of Bridge, west of the A2

SEA theme	Commentary, Site A: Land east of Bridge, west of the A2				
Biodiversity and Geodiversity	 Whilst the site contains a number of mature trees, the site does not offer significant biodiversity value. There are no European or nationally designated biodiversity or geodiversity sites within or adjacent or close to the boundary of the site. The site is within 3.3km of the Chequer's Wood and Old Park SSSI and Ileden and Oxenden Woods SSSI. It is however outside of SSSI Impact Risk Zones for the types of development with the potential to be taken forward through the Neighbourhood Plan. As such allocations at this site are unlikely to have effects on SSSIs present in the wider vicinity of the parish. There are no Local Wildlife Sites or Local Nature Reserves on or in the vicinity of the site. Whilst the site is close to a significant area of Woodpasture and Parkland BAP Priority Habitat associated with Bifrons Park, this is located on the far side of the A2 trunk road. The site is identified as falling within a potential habitat for Turtle Doves and Arable Assemblage Farmland Birds. 				
SEA theme	Commentary, Site A	: Land east of Bridge, west of the A2	2		
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	Development of the site will lead to inevitable increases in greenhouse gas emissions from an increase in the built footprint of the village and an intensification of uses at this location, although these are unlikely to be significant given the size of the site and the scale of likely development. The site is in good proximity to the services and facilities in the village centre and bus stops, helping to limit the need to travel to local amenities (and associated				
Climate Change	greenhouse gas emissions). In relation to adapting to the effects of climate change, approximately 35% of the site is within Flood Zone 3, and a further 10% is within Flood Zone 2. The flood risk is mainly along the southern part of the site adjacent to the Nail Bourne, although it extends north towards the centre of the site across a lower-lying area of ground. This area also corresponds with the part of the site at risk of surface water flooding. Whilst the site is of sufficient size for development within these areas to be avoided, development proposals on the site would need to ensure this risk is managed.				
Landscape	The site is located within the Kent Downs AONB. Development of the site would likely comprise major development in the AONB. The site sits on the lower part of a slope running from Town Hill in the north towards the Nailbourne, which forms the southern boundary of the site. It is relatively well-screened from the wider landscape by the A2 embankment, although the northern edge of the site may be visible from higher ground, including parts of the North Downs Way which runs approximately 350m to the south (east of the A2). There are views across the site from the public footpath which crosses it from east to west, as well as from several points in the village and from Patrixbourne Road.				
	The site is within the Conservation Area.	ne Bifrons Park (Bekesbourne with	Patrixbourne / Bridge)		
	Heritage assets affected	What contribution does the site make to the significance of the heritage asset(s)?	Potential impact of development on significance		
Historic Environment	Bifrons Park (Bekesbourne with Patrixbourne / Bridge) Conservation Area.	The site is within the historic parkland of the conservation area and contributes to the open aspect of this part of the conservation area.	Development of c.40 homes and community infrastructure would impact upon the fabric and setting of the conservation area. A key impact would be through the loss of the 'open' aspect and perspective of this part of the		
		Figure 4.2: View of the site within the conservation area (source: Google Street View).	conservation area.		

Development at the site is likely to affect the historic setting of the village.

No nationally or locally listed buildings are present on or adjacent to the site. Given the distance to listed buildings present in the centre of the village (c.200m) and existing screening provided from other buildings, there are unlikely to be significant effects on their settings.

No sites listed on the Kent Historic Environment Record are present on or adjacent to the site.

SEA theme	Commentary, Site A: Land east of Bridge, west of the A2			
Land, Soil and Water Resources	As the site is a greenfield location, development would not make the best use of previously developed land. It is not possible to confirm if development at site will lead to a loss of Best and Most Versatile Agricultural Land, as recent land classification has not been undertaken at this location. However, pre-1988 agricultural land classification indicates that the site is located on Grade 2 land and as such has the potential to be located on the Best and Most Versatile Agricultural Land. It is important to note though that the national dataset is of very low resolution and may not necessarily provide an accurate reflection of the agricultural land quality within the Neighbourhood Plan area. The site is not located within a Groundwater Source Protection Zone.			
Population and Community	Allocation of the site will contribute positively towards meeting local housing needs, including through the delivery of affordable housing. The site also offers significant potential to deliver community facilities. Located within 200m of village centre amenities and bus links, the site is located with good proximity to local services and facilities. It is also located adjacent to the school and recreation ground/sports facilities.			
Health and Wellbeing	The site is located close to pedestrian routes, public rights of way and accessible to open countryside. It is also located adjacent to the recreation ground, where there is open space, a children's play area, adult gym equipment, tennis courts, and a football pitch. This will support the health and wellbeing of residents through ready access to recreational opportunities. The site is located adjacent to Bridge Health Centre on Patrixbourne Road. Whilst screened, part of the site is located adjacent to the A2 trunk road. This has the potential to lead to some limited impacts on health and wellbeing due to noise pollution issues.			
Transportation	The site is located with good proximity to local facilities and public transport links. In this context it is located within 200m of village centre amenities and bus links. It is also located adjacent to public rights of way.			
Кеу				
Likely adverse effect (without mitigation measures)			Likely positive effect	
Neutral/no effect			Uncertain effect	

Table 4.4: Site B, Brickfield Farm

SEA theme	Commentary, Site B: Brickfield Farm				
Biodiversity and Geodiversity	There are no European or nationally designated biodiversity or geodiversity sites within or adjacent or close to the boundary of the site. The site is within 3.8km of the Chequer's Wood and Old Park SSSI and Ileden and Oxenden Woods SSSI. It is however outside of SSSI Impact Risk Zones for the types of development with the potential to be taken forward through the Neighbourhood Plan. As such allocations at this site are unlikely to have effects on SSSIs present in the wider vicinity of the parish. The site adjoins an area of Traditional Orchard BAP Priority Habitat. However, this is located on the far side of buildings associated with Brickfield Farm, and development on this site is unlikely to lead to significant effects on the integrity of this habitat, such as from noise, light pollution or trampling from enhanced access. On site, the site does not offer significant biodiversity value.				
Climate Change	Development of the site will lead to inevitable increases in greenhouse gas emissions from an increase in the built footprint of the village and an intensification of uses at this location, although these are unlikely to be significant given the size of the site and the scale of likely development. The site is in good proximity to the services and facilities in the village centre and bus stops, helping to limit the need to travel to local amenities (and associated greenhouse gas emissions). In relation to adapting to the effects of climate change, the site is not at risk of fluvial flooding. There is a very small part of the site located to the east of Brickfield Farm which is at low risk of surface water flooding. However, this is not considered to be a significant constraint on development.				
Landscape	The site is located within the Kent Downs AONB. Development of the site would likely comprise major development in the AONB. The site is a greenfield site with medium-high landscape and visual amenity sensitivities. It occupies sloping ground to the south of the village and has high visibility from the open countryside. Development which extends south-west beyond the line of the existing housing at Brickfield Close and Bourne View is likely to represent a significant incursion into the AONB, with associated significant impacts on landscape character.				

SEA theme	Commentary, Site B: Brickfield Farm					
	The whole site is within the Bourne Park (Bishopsbourne/ Bridge) Conservation Area. It is also within the setting of the Grade II listed Little Bridge Place.					
	Heritage assets affected	What contribution does the site make to the significance of the heritage asset(s)?	Potential impact of development on significance			
Historic Environment	Bourne Park (Bishopsbourne/ Bridge) Conservation Area.	The site forms part of the undeveloped part of the conservation area, which comprises former parkland.	Development of c.40 homes and community infrastructure at this location has the potential to impact on the fabric and setting of the conservation area. In particular, development which extends south-west beyond the line of the existing housing at Brickfield Close and Bourne View is likely to represent a significant incursion into the open aspect of this part of the conservation area, which forms an important visual link to open countryside.			
	Little Bridge Place (Grade II listed building dating from the C17th / early C18th ⁾ . It is also listed on the Kent HER as a "Post Medieval farmstead" with "a loose courtyard plan farmste ad with buildings to one side of the yard".	The site provides open views to and from Little Bridge Place to the west. Figure 4.3: View of Little Bridge Place across the site from Brickfield Place (source: Google Street View).	Development at the site has the potential to have significant impacts on the historic setting of Little Bridge Place through impacting on key views across open land to the west.			
	The site is highly visible from the open countryside, with implications for the historic setting of the village. In terms of the Kent Historic Landscape Characterisation, the site is within an area of the following character type: " <i>Medium regular with straight boundaries (parliamentary type enclosure)</i> ".					
Land, Soil and Water Resources	As the site is a greenfield location, development would not make the best use of previously developed land. It is not possible to confirm if development at site will lead to a loss of Best and Most Versatile Agricultural Land, as recent land classification has not been undertaken at this location. However, pre-1988 agricultural land classification indicates that the site is located on Grade 2 land and as such has the potential to be located on the Best and Most Versatile Agricultural Land. It is important to note though that the national dataset is of very low resolution and may not necessarily provide an accurate reflection of the agricultural land quality within the Neighbourhood Plan area. The site is not located within a Groundwater Source Protection Zone.					
Population and Community	Allocation of the site will contribute positively towards meeting local housing needs, including through the delivery of affordable housing. It also has the potential to deliver community facilities. Located within 350m of village centre amenities and bus links, the site is located with good proximity to local services and facilities.					

SEA theme	Commentary, Site B: Brickfield Farm			
Health and Wellbeing	The site is accessible to the public rights of way network and is and accessible to open countryside via a footpath accessible from Mill Lane north of Bourne View. It is also located approximately 700m from the recreation ground, where there is open space, a children's play area, adult gym equipment, tennis courts, and a football pitch. This will support the health and wellbeing of residents through enabling relative access to key recreational opportunities in the village.			
Transport	The site is located with good proximity to local facilities and public transport links. In this context it is located within 350m of village centre amenities and bus links. It is also located close to a public footpath with access to the village public rights of way network.Access to the site is via a narrow road (Mill Lane), the eastern end of which is liable to flooding from the Nail Bourne.			
Кеу				
Likely adverse effect (without mitigation measures)			Likely positive effect	
Neutral/no effect			Uncertain effect	

Table 4.5: Site C, Land at Bourne Park Road

SEA theme Commentary, Site C: Land at Bourne Park Road

Biodiversity and Geodiversity	There are no European or nationally designated biodiversity or geodiversity sites within or adjacent or close to the boundary of the site. The site is within 3.7km of the Chequer's Wood and Old Park SSSI and lleden and Oxenden Woods SSSI. It is however outside of SSSI Impact Risk Zones for the types of development with the potential to be taken forward through the Neighbourhood Plan. As such allocations at this site are unlikely to have effects on SSSIs present in the wider vicinity of the parish. The eastern edge of the site comprises areas of deciduous woodland BAP Priority Habitat. In addition to the potential loss of part of this habitat to development, disturbance to the habitat has the potential to take place from noise, light pollution or trampling from enhanced access.	
Climate Change	Development of the site will lead to inevitable increases in greenhouse gas emissions from an increase in the built footprint of the village and an intensification of uses at this location, although these are unlikely to be significant given the size of the site and the scale of likely development. The site is in good proximity to the services and facilities in the village centre and bus stops, helping to limit the need to travel to local amenities (and associated greenhouse gas emissions). In relation to adapting to the effects of climate change, the site has significant flood risk issues associated with the presence of the Nail Bourne. Most of the site is within Flood Risk Zones 2 and 3, and the northern half of the site has a medium-high risk of surface water flooding, significantly reducing the developable area. The existing access road (Brewery Lane) is also at high risk of flooding.	
Landscape	The site is located within the Kent Downs AONB. Development of the site would likely comprise major development in the AONB. The site is a greenfield site with medium-high landscape and visual amenity sensitivities. Whilst the site is relatively screened from open countryside, it comprises a key component of the open aspect of this part of the village. As such development on the site is likely to have significant effects on villagescape character, including associated with impacts on the setting of the historic environment and the historic villagescape (discussed below).	

SEA theme Commentary, Site C: Land at Bourne Park Road

Development of the site has the potential to have significant impacts on the integrity of the Bourne Park Conservation Area and the Bridge Conservation Area. It also has the potential to have impacts on the setting of two Grade II* listed buildings and one Grade II listed building.

Heritage assets affected	What contribution does the site make to the significance of the heritage asset(s)?	Potential impact of development on significance
Bourne Park Conservation Area and the Bridge Conservation Area	The site forms part of the undeveloped part of the Bourne Park Conservation Area. It comprises an undeveloped part of the conservation area, which has a close contribution to the setting of the villagescape at this location. The site is also adjacent to the Bridge Conservation Area	homes and community
Church of St Peter (Grade II* listed building). Distinctive church dating from C12th, enlarged in the C13th and significantly enlarged in mid-C19th.	The site provides expansive open views to and from the church from the west and south west. The site forms an important backdrop to the church.	Development at the site has the potential to have a significant impact on the historic setting of the Church of St Peter through impacting on key views to and from the church across open land from west and south west. These views form an important component of the historic villagescape in this part of Bridge.
Bridge Place (Grade II* listed building). Remains of a large mansion built by Sir Arnold Braems in the late C17th.	Some limited views to Bridge Place are present from the southern part of the site. These are partly screened by existing trees.	Development of the southern part of the site has the potential to impact on the setting of Bridge Place through effects on views to and from the feature. However, impacts on the integrity of the site are likely to limited by existing screening.
Church Cottage (Grade II listed building) Two story cottage dating from the C18th.	The garden of Church Cottage is located adjacent to the eastern corner of the site. The cottage is however screened from the site by existing trees.	Impacts from new development at the site on the setting of Church Cottage would be limited by the presence of trees.

Historic Environment

SEA theme	Commentary, Site C: Land at Bourne Park Road				
Land, Soil and Water Resources	As the site is a greenfield location, development would not make the best use of previously developed land. It is not possible to confirm if development at site will lead to a loss of Best and Most Versatile Agricultural Land, as recent land classification has not been undertaken at this location. However, pre-1988 agricultural land classification indicates that the site is located on Grade 2 land and as such has the potential to be located on the Best and Most Versatile Agricultural Land. It is important to note though that the national dataset is of very low resolution and may not necessarily provide an accurate reflection of the agricultural land quality within				
	the Neighbourhood Plan area. The site is not located within a Groundwater Source Protection Zone.				
Population and Community	Allocation of the site will contribute positively towards meeting local housing needs, including through the delivery of affordable housing. It also has the potential to deliver community facilities. Located within 250m of village centre amenities and bus links, the site is located with good proximity to local services and facilities.				
Health and Wellbeing	The site is accessible to the public rights of way network and is and accessible to open countryside via a footpath accessible from Brewery Lane/Mill Lane and Bourne Park Road. It is also located approximately 400m from the recreation ground, where there is open space, a children's play area, adult gym equipment, tennis courts, and a football pitch. This will support the health and wellbeing of residents through enabling relative access to key recreational opportunities in the village.				
Transportation	Transportation The site is located with good proximity to local facilities and public transport links. In this context it is located within 250m of village centre amenities and bus links. It is also located close to a public footpath with access to the village public rights of way network.				
Кеу					
Likely adverse effect (without mitigation measures)			Likely positive effect		
Neutral/no effect			Uncertain effect		

Current approach in the Neighbourhood Plan and the development of Neighbourhood Plan policies

Choice of site taken forward for the purposes of the Neighbourhood Plan

- 4.22 The Neighbourhood Plan takes forward one site for allocation, between the recreation ground and the A2. The coverage of the allocation reflects Site A considered above.
- 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.

Neighbourhood Plan policies

- 4.26 To support the implementation of the vision and objectives for the Neighbourhood Plan discussed in Section 2.3 and 2.4, the current version of the Bridge Neighbourhood Plan puts forward 15 policies to guide development in the Neighbourhood Plan area. These were developed following extensive community consultation and evidence gathering.
- 4.27 An earlier version of these policies were assessed (with the assessment consulted on) during earlier phases of plan development, including during the previous iteration of the plan.
- 4.28 The policies presented in the current submission consultation version of the Neighbourhood Plan, grouped under the six objectives of the Neighbourhood Plan, are as follows:

Table 4.6: Bridge Neighbourhood Plan policies

Policies (grouped by Neighbourhood Plan objectives)

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

Policy A1

Policy A2

Objective B. Promoting Sustainable Transport

Policy B1

Policy B2

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

Policy C1

Policy C2

Policy C3

Policy C4

Policy C5

Objective D. Promoting Healthy Communities

Policy D1

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

Policy E1				
Policy E2				
Policy E3				
Policy E4				
Objective F. Conserving	and Enhancing th	e Historic Environn	nent	

Policy F1

The next chapter presents the findings of the assessment of these policies.

5. What are the appraisal findings at this current stage?

Introduction

- 5.1 The aim of this chapter is to present appraisal findings and recommendations in relation to the current submission version of the Bridge Neighbourhood Plan. This chapter presents:
 - An appraisal of the submission version of the Neighbourhood Plan under the eight SEA theme headings; and
 - The overall conclusions at this current stage.

Approach to this appraisal

- 5.2 The appraisal is structured under the eight SEA themes taken forward for the purposes of the SEA.
- 5.3 For each theme, 'significant effects' of the current version of the plan on the baseline are predicted and evaluated. Account is taken of the criteria presented within Schedule 2 of the Regulations. So, for example, account is taken of the probability, duration, frequency and reversibility of effects as far as possible. These effect 'characteristics' are described within the assessment as appropriate.
- 5.4 Every effort is made to identify / evaluate effects accurately; however, this is inherently challenging given the high-level nature of the plan. The ability to predict effects accurately is also limited by understanding of the baseline and the nature of future planning applications. Because of the uncertainties involved, there is a need to exercise caution when identifying and evaluating significant effects and ensure all assumptions are explained. In many instances it is not possible to predict significant effects, but it is possible to comment on merits (or otherwise) in more general terms.

Biodiversity and Geodiversity

- 5.5 The allocated site taken forward through the Neighbourhood Plan is not located within an area of significant biodiversity value. There are no European or nationally designated biodiversity or geodiversity sites within or adjacent or close to the boundary of the site, and the site is also not within an SSSI Impact Risk Zone for the types of development proposed to be taken forward on the site. This includes relating to the Chequer's Wood and Old Park SSSI and Ileden and Oxenden Woods SSSI, which are located approximately 3.3km distant. This document has been prepared by AECOM Limited ("AECOM") for sole use of our client (the "Client") in accordance with generally accepted consultancy principles, the budget for fees and the terms of reference agreed between AECOM and the Client. Any information provided by third parties and referred to herein has not been checked or verified by AECOM, unless otherwise expressly stated in the document. No third party may rely upon this document without the prior and express written agreement of AECOM. In addition, there are no Local Wildlife Sites or Local Nature Reserves on or in the vicinity of the site.
- 5.6 Whilst the site is close to a significant area of Woodpasture and Parkland BAP Priority Habitat associated with Bifrons Park, this is located on the far side of the A2 trunk road, and is unlikely to be affected by landtake, disturbance or impacts from noise and light pollution.
- 5.7 Whilst no significant negative effects on biodiversity can be readily identified, there will be a need for potential effects on biodiversity linked to future development in the Neighbourhood Plan area to be avoided and mitigated. Therefore, the Neighbourhood Plan sets out provisions which will 1) help limit potential effects from new development on features and areas of biodiversity interest and 2) support the resilience of ecological networks.

- 5.8 In this respect Policy C1 sets out a range of design considerations which will support habitats and species. This includes through providing sufficient garden space (recognising the role gardens have in supporting biodiversity locally), retaining existing important landscape features such as trees, hedges and ponds, and utilising native species in new landscaping to provide appropriate habitats. The policy also sets out a commitment to avoid unacceptable levels of noise, air or water pollution. This will support biodiversity, with the policy's commitment to limiting light pollution and protecting dark night skies also supporting key nocturnal species in the parish.
- 5.9 Ecological networks will also be supported by Policy D1, which seeks to retain and enhance green infrastructure provision and Policy E4, which seeks to protect seven areas in the village as Local Green Spaces.
- 5.10 As such, the Neighbourhood Plan effectively supports national and Local Plan policy provisions with regards to biodiversity through seeking to protect and enhance habitats, species and ecological networks in Bridge.

Climate Change

- 5.11 In terms of climate change contribution, per capita greenhouse gas emissions generated in the Neighbourhood Plan area may continue to decrease with the wider adoption of energy efficiency measures, renewable energy production and new technologies. Transport emissions may also be limited by take up of electric cars. However, increases in the built footprint of the Neighbourhood Plan area would contribute to increases in the absolute levels of greenhouse gas emissions.
- 5.12 Whilst the delivery of approximately 40 homes through the Neighbourhood Plan will increase greenhouse gas emissions either directly through construction, or indirectly through an increase in population, the built footprint of the area and associated travel and consumption behaviours, this level of housing would likely be mirrored by the approval of planning applications. As such the level of development proposed through the Neighbourhood Plan will be unlikely to lead to increases in greenhouse gas emissions over and above that would be seen otherwise.
- 5.13 The Neighbourhood Plan will help limit per capita greenhouse gas emissions through seeking to focus new development in close proximity to Bridge village centre. The location of the Neighbourhood Plan site allocation is accessible to the key services and facilities in the village, including shops, the health centre, primary school and the adjacent village hall and sports / recreational facilities. This will help reduce the need for residents to travel for many day-to-day facilities and reduce car dependency, helping to limit emissions from road transport. This will be supported by a number of the policies seeking to explicitly encourage walking and cycling through enhanced pedestrian and cycle provision. This is discussed in more detail under the 'Transportation' SEA theme below.
- 5.14 The Neighbourhood Plan does not seek to apply energy efficiency standards within new development. In this context the Code for Sustainable Homes was formally withdrawn in a Ministerial Statement published on 25th March 2015, which outlined the Government's new national planning policy on the setting of technical standards for new dwellings and Local Plan making. In addition to this, the Deregulation Act also brought in a clause which amended the Planning and Energy Act 2008 to prevent local authorities from requiring higher levels of energy efficiency than existing Building Regulations. On this basis, it would not be appropriate for the Neighbourhood Plan to set specific targets for energy efficiency as part of a design policy. However, Policy C1 recognises the role of new development in supporting climate change mitigation through seeking to promoting development which utilises energy efficient and sustainable building design, and renewable energy provision.
- 5.15 In terms of climate change adaptation, the Neighbourhood Plan has a close recognition of the flood risk issues present locally in the parish, including linked to the presence of the Nail Bourne. This includes relating to the flood risk present on and adjacent to the site allocated through the Neighbourhood Plan. In this context approximately 35% of the site is within Flood Zone 3, and a further 10% is within Flood Zone 2. The flood risk is mainly along the southern

part of the site adjacent to the Nail Bourne, although it extends north towards the centre of the site across a lower-lying area of ground. This area also corresponds with the part of the site at risk of surface water flooding.

- 5.16 As highlighted by masterplan accompanying the site allocation, the main areas proposed for development on the site (delivering 40 dwellings and a village hall) are in locations away from areas at risk of flooding. This recognises that the site is of sufficient size for development within Flood Zones 2 and 3 to be avoided. This will be further reinforced by Policy E1, which states that no development will be supported which takes place in Flood Zone 2 or 3. Policy C4 also seeks to ensure that developers are required to identify and manage any increased risk of flooding which results from new development, including areas off-site.
- 5.17 In addition, the allocation policy (Policy C2) reasserts that development will need to be delivered in conjunction with the appropriate flood risk policies. It is also recognised that the provisions of the NPPF and national policy (including relating to the sequential and exception test) will help guide development away from flood risk areas and ensure that appropriate mitigation measures are implemented.
- 5.18 As highlighted by the NPPF, well planned green infrastructure can help an area adapt to, and manage the risks of climate change (including flood risk). Enabling and providing for green infrastructure within the Neighbourhood Plan area is therefore a key way in which the Neighbourhood Plan can help to promote climate change adaptation measures. Responding to this, Policy E4 designates seven areas within the Neighbourhood Plan area as Local Green Space. Alongside, Policy C1 seeks to retain existing important landscape features such as trees, hedges and ponds, and contribute towards landscape enhancements, including new open space where appropriate. Policy D1 also seeks to protect important local green spaces and green infrastructure around the village. These policies will therefore help support the Neighbourhood Plan area in adapting to the effects of climate change, including through enhancing its resilience to extreme weather events.
- 5.19 As such, the Neighbourhood Plan sets out a range of provisions which will support positive gains with regard to climate change adaptation measures within the Neighbourhood Plan area.

Landscape

- 5.20 The Neighbourhood Plan area has a distinctive and valued landscape and villagescape. This is recognised by the coverage of the nationally designated Kent Downs AONB over the majority of the parish, including an area incorporating the existing built up area of Bridge village.
- 5.21 The site allocated through the Neighbourhood Plan west of the A2 through Policy C2 is located within the Kent Downs AONB. Given the scale of development proposed through the Neighbourhood Plan (40 homes and a village hall), the development proposals for the site would be likely to comprise major development in the AONB.
- 5.22 The site allocation taken forward through the Neighbourhood Plan is not however located in sensitive location within the AONB in terms of the special qualities of the wider landscape. In terms of the sensitivities of the site, the site sits on the lower part of a slope running from Town Hill in the north towards the Nailbourne, which forms the southern boundary of the site. It is relatively well-screened from the wider landscape by the A2 embankment, and although the northern edge of the site may be visible from higher ground, including parts of the North Downs Way (located to the east of the A2), impacts on wider landscape character are not likely to be significant.¹⁰ The proposed masterplan for the site also highlights that the developed area will be limited to a small proportion of the site, with the majority of the site comprising open space and green infrastructure provision.
- 5.23 More broadly, the landscape sensitivities of the parish, including associated with the Kent Downs AONB, are closely recognised by the Neighbourhood Plan policies, which have a strong focus on protecting and enhancing landscape and villagescape character. This will help ensure

¹⁰ Potential effects on the setting of the historic environment in the village from the site allocation are discussed in the next section.

that development in the parish respects the distinctive appearance of Bridge in its landscape setting

- 5.24 In this respect Policy C1 sets out a range of provisions for ensuring that new development areas in the parish reflect the landscape sensitivities of the parish. This includes through seeking to ensure that new development is appropriate for the topography of the site, retains existing important landscape features such as trees, hedges and ponds, and contributes to landscape enhancements, including new open space where appropriate. The policy also seeks to facilitate the use of native species in new landscaping, with a view to conserving and enhancing natural beauty, and aims to limit noise and light pollution, with a view to supporting tranquillity and preventing 'night blight'. Furthermore, the policy seeks to use the Village Design Statement as a key hook for the policy in terms of delivering high quality design; this provides an appropriate basis for conserving villagescape character in Bridge.
- 5.25 The provisions set out in Policy C1 are supported by the other policies of the plan. The Neighbourhood Plan's focus on protecting open space and green infrastructure provision, including through Policy E4, which designates seven areas within the Neighbourhood Plan area as Local Green Space and Policy D1, which seeks to protect important local green spaces and green infrastructure around the village, will support landscape character in the parish. This will be further supported by Policy E2, which seeks to preclude development proposals that reduce a sense of openness and separation between Bridge and Canterbury. Through positively contributing to the protection of the strategic 'green gap' between Bridge and Canterbury as taken forward through the Canterbury District Local Plan, this will help avoid the coalescence of development and support the distinctiveness of the two settlements, reinforcing their settings within the landscape.
- 5.26 The Neighbourhood Plan's focus on conserving and enhancing the historic environment (discussed in the next section) will also support landscape and villagescape character and local distinctiveness.
- 5.27 Overall, the Neighbourhood Plan policies have a strong focus on protecting and enhancing landscape character, the quality of the public realm and local distinctiveness. This will help limit potential impacts of new development on the special qualities of the Kent Downs AONB, including linked to the delivery of the proposed Neighbourhood Plan allocation west of the A2.

Historic Environment

- 5.28 The Neighbourhood Plan area has a rich historic environment, as reflected by the presence of 43 listed buildings, one scheduled monument and coverage of three conservation areas over much of Bridge village. Additionally, the Historic Environment Record (HER) for Kent contains details of over 100 locally important heritage assets in the Neighbourhood Plan area reflecting features from a range of periods. Notable amongst these is the course of 'Watling Street', which is one of the foremost highways of Roman Britain. In this context, a central focus for the policies proposed through the Neighbourhood Plan is on protecting and enhancing the quality of the public realm, supporting local distinctiveness, protecting landscape and villagescape character and supporting the conservation and enhancement of the historic environment.
- 5.29 The site allocated through the Neighbourhood Plan west of the A2 is located within the Bifrons Park (Bekesbourne with Patrixbourne / Bridge) Conservation Area. In this context development of c.40 homes and community infrastructure has the potential to impact upon the fabric and setting of the conservation area. A key impact would be through the loss of the 'open' aspect and perspective of this part of the conservation area, and effects on the historic setting of the village. This is linked to the site's location within the historic parkland of the conservation area.
- 5.30 However, no nationally or locally listed buildings are present on or adjacent to the allocated site. Given the distance to listed buildings present in the centre of the village (c.200m) and existing screening provided from other buildings, there are unlikely to be significant effects on their settings. Likewise, no sites listed on the Kent Historic Environment Record are present on or adjacent to the site. More specifically, the proposals for the site (as set out for by the site masterplan) limits residential development to a small proportion of the site, with the majority of

the site comprising open space and green infrastructure provision. In this respect housing delivered on the site will be located closer to the A2, away from key heritage assets in the village, and most of the open aspect of the location will be preserved. These layout considerations will therefore help limit impacts on the historic environment, including the open setting of the conservation area in this location.

- 5.31 Potential impacts of development at the site and elsewhere in the parish over the plan period will also be limited by the Neighbourhood Plan policies, which have a close focus on conserving and enhancing the significance of buildings and structures of architectural or historic interest, both designated and non-designated, and their settings. In this respect, Policy C1 sets out a range of provisions for delivering high quality design which reflects the historic sensitivities of the village. This includes through requiring new development to '*sustain and enhance the significance and setting of any heritage asset*', a requirement for the careful consideration of the need to conserve or enhance the character and appearance of the conservation areas in the village and their settings, and the introduction of high quality landscaping. This will be further supported by Policy C3, which seeks to ensure that existing local settings and densities are reflected through new development.
- 5.32 Policy F1 also seeks to ensure that new development utilises the Village Design Statement to guide building design and the use of materials in new development. Given the detailed provisions set out in the Village Design Statement with regard to local character and distinctives, this is an appropriate basis for the delivery of development which is sensitive to the fabric and setting of the historic environment.
- 5.33 The Neighbourhood Plan also recognises Bridge's significant archaeological resource. In this context Policy C5 highlights that all development should be accompanied by an archaeological assessment 'being undertaken to the specification of the City Council's Archaeological Adviser'. It also highlights that, where appropriate, proposals for new development should carry out an initial archaeological assessment to establish if a more detailed archaeological investigation is required.
- 5.34 The Neighbourhood Plan policies also have a close focus on conserving and enhancing landscape and villagescape character (discussed under the 'Landscape' SEA theme above). This will help protect and enhance the setting of the historic environment and support local distinctiveness through the utilisation of the existing heritage resource as a key contributor to a sense of place.

Land, Soil and Water Resources

- 5.35 In relation to the proposed Neighbourhood Plan allocation (taken forward through Policy C2), the development on land between the recreation ground and the A2 would result in the loss of an existing area of greenfield land. Based on the 1:250,000 series of Agricultural Land Classification (ALC) maps produced by Natural England, the site is underlain by Grade 3 land. However, in the absence of a detailed ALC assessment, it is not currently possible to determine whether the site is underlain by the 'Best and Most Versatile Agricultural Land' (i.e. Grade 3a land). In this context, it is important to recognise that the proposed allocation is not of a scale which would result in significant losses of greenfield land within the Neighbourhood Plan area. Alongside, the masterplan for the site limits residential development to a small proportion of the site, with the majority of the site comprising open space and green infrastructure provision. This will help limit the loss of greenfield land.
- 5.36 With regards to water quality, passing adjacent to the south eastern boundary of the proposed allocation, the River Nail Bourne is the principal watercourse which flows through the Neighbourhood Plan area. Reflecting data from the Environment Agency¹¹, the overall ecological quality of the water body was classified as 'poor' in 2016, with an objective to achieve 'good' ecological quality status by 2027. In this regard, the provisions of Policy C4 aim to minimise the potential risks of surface water run-off from new development through seeking to ensure that developers are required to identify and manage any increased risk of flooding

¹¹ Environment Agency (2016): 'Nailbourne and Little Stour', [online] available to access via: <<u>http://environment.data.gov.uk/catchment-planning/WaterBody/GB107040019590</u>>

which results from new development, including areas off-site, and via the application of sustainable drainage system features which would attenuate and restrict the rate and volume of surface water leaving the site and entering the Nail Bourne. In terms of groundwater quality, the site allocation is not located within a Groundwater Source Protection Zone.

5.37 A number of the policies seek to protect key features of landscape and biodiversity interest, key areas of open space, areas of landscape sensitivity and promote high quality landscaping and green infrastructure enhancements (see Section 5.20 to 5.27). While these policies do not specifically seek to address land, soil and water resources, the policies will indirectly help promote and protect these resources, including through the promotion of high-quality green networks in the Neighbourhood Plan area and the protection and enhancement of key landscape features. This will help support the capacity of the landscape and villagescape to regulate soil and water quality.

Population and Community

- 5.38 Within the Canterbury District Local Plan, Bridge (i.e. the Neighbourhood Plan area) is classified as a Local Centre within the Rural Settlement Hierarchy, with no specific housing number or site allocations identified. Policy SP4 'Strategic approach to location of development' of the Local Plan states that the 'provision of new housing that is of a size, design, scale, character and location appropriate to the character and built form of the local centre of Bridge 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'.
- 5.39 To further gain an understanding of the housing need within the Neighbourhood Plan area, a Housing Needs Survey¹² was undertaken in July 2017. The report identified the need for eleven affordable homes and a further five open market properties suitable for households wanting to downsize to more suitable housing types for their needs. In this regard, the proposed Neighbourhood Plan allocation (see Policy C2) supports limited housing development of up to 40 dwellings on the site between the recreation ground and the A2 road, which would include an element of affordable housing for people with a connection to Bridge. Therefore, it is expected that the allocations within the Neighbourhood Plan will meet the objectively assessed housing needs arising locally. Additionally, as per the provisions of Policy HD2 in the Canterbury District Local Plan, the City Council will seek provision of 30% affordable housing for developments consisting of eleven or more units. Consequently, the proposed allocation through the Neighbourhood Plan would facilitate at least 12 affordable homes, which would help meet the affordable housing needs arising locally.
- 5.40 In line with other areas of the UK, the population of the Neighbourhood Plan area is ageing. Based on the 2011 census data, 37.0% of the population are over 60 years of age, higher than the totals for Canterbury (25.2%), the South East of England (23.3%) and England (22.3%). Reflecting these trends, the proposed allocation through the Neighbourhood Plan is located within 250m of the village centre, which contains a variety of services and facilities along with providing access to the public transport network. This will help reduce the need to travel for amenities and also support the quality of life of residents living within the new dwellings.
- 5.41 In terms of the quality of housing, Policy C1 sets out a range of provisions which seek to deliver high quality development which supports the quality of life of residents. This includes through: the utilisation of sustainable building design, including energy efficiency and renewable energy; incorporating the principles of 'Secured by Design' 2016 (SBD) as amended, and wherever possible, achieving SBD accreditation; and providing sufficient garden space. Similarly, the policy states that all development must be designed to a high quality, with careful consideration given to (amongst other things) the height, scale, spacing, density, layout, orientation, design and materials of buildings and creating safe, accessible and well-connected environments that meet the needs of users.

¹² Bridge Village (2017): 'Bridge Housing Needs Survey July 2017', [online] available to access via: <<u>http://www.bridgevillage.co.uk/jcwebfiles/parishcouncil/pages/NHP/Bridge%20HNS%20report%202017.pdf</u>> last accessed [22/02/18]

- 5.42 A number of the policies within the Neighbourhood Plan will also positively enhance community vitality, supporting the quality of life of residents and the satisfaction of residents with their neighbourhoods as a place to live. With regards to community facilities, alongside the c.40 homes, the Neighbourhood Plan allocates land at the same site for a village hall, for sports pitches, for recreational play areas and for undeveloped land for recreational use. It also subjects the granting of planning permission for any part of the housing development on the site 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.
- 5.43 With regards to supporting the economic vitality of the Neighbourhood Plan area, Policy A1 supports proposals for the development of new B1 business uses and live-work units within Bridge, providing they do not lead to the loss of existing A1 shops or community facilities and do not harm local residential amenity. Policy A2 also outlines support for the proposed conversion of redundant farm buildings at Great Pett Farm to B1 business uses which are both appropriate to the rural setting and would not significantly increase traffic within the Neighbourhood Plan area. These policies will therefore support local employment opportunities appropriate for the local community.

Health and Wellbeing

- 5.44 In terms of the proposed Neighbourhood Plan site allocation, the site west of the A2 is located adjacent to Bridge Health Centre on Patrixbourne Road. It is also located close to pedestrian routes, public rights of way and is accessible to open countryside. It is also located adjacent to the recreation ground, where there is open space, a children's play area, adult gym equipment, tennis courts, and a football pitch. This will support the health and wellbeing of residents through ready access to recreational and leisure opportunities.
- 5.45 More broadly, the Neighbourhood Plan policies will bring a range of further benefits for health and wellbeing. The main impacts of the Neighbourhood Plan's policies on health and wellbeing will be through protecting and enhancing the Neighbourhood Plan area's high-quality environment and public realm and green infrastructure provision. Green infrastructure provides space including natural green space for recreation and relaxation, and access to nature has been evidenced to improve people's health and wellbeing, through encouraging healthy outdoor recreation and relaxation¹³. This will support physical and mental health and wellbeing.
- 5.46 A key policy in this regard is Policy E4, which designates seven areas within the Neighbourhood Plan area as Local Green Spaces and Policy D1, which seeks to protect important local green spaces and green infrastructure around the village. Accessible green infrastructure provision in Bridge will be further supported by the allocation policy (Policy C2), which protects and delivers additional green infrastructure provision, including land for sports pitches, for recreational play areas and for undeveloped land for recreational use. It also subjects the granting of planning permission for any part of the housing development on the site 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. This will support the protection and enhancement of key green infrastructure assets in the village, supporting the health and wellbeing of residents over the longer term.
- 5.47 As discussed under the Population and Communities SEA theme, the Neighbourhood Plan seeks to support the delivery of high quality and energy efficient housing of a range of types and tenures. The policies also seek to ensure that new development is safe, attractive, inclusive and accessible, limits crime and the fear of crime, and does not cause unnecessary noise and light pollution. Policies C1 and C3 also seek to ensure sufficient garden space is provided with new housing. In this respect the Neighbourhood Plan will help facilitate the delivery of high quality and inclusive homes and neighbourhoods with the potential to promote the physical and mental health and wellbeing of residents.

¹³ Public Health England (2017)

5.48 The extent to which the Neighbourhood Plan contributes to active travel will also be a key contributor to the health and wellbeing of residents in the parish. This has been discussed in more detail under the 'Transportation' SEA theme below.

Transportation

- 5.49 With regards to the proposed Neighbourhood Plan allocation west of the A2, the site is located in good proximity to the services and facilities in Bridge village centre, which is approximately 250m away, as well as the adjacent medical centre and recreational provision. The site is also linked to local public right of way networks and footpaths. This will help limit the need to travel to the key amenities available in the village, and promote the use of alternative modes of transport to the car. Sustainable transport use will be further supported by the site's access to key bus routes in the village; the site is located close to bus stops with links to Canterbury, Aylesham, Folkestone and Dover.
- 5.50 The Neighbourhood Plan policies otherwise have a close focus on encouraging sustainable transport use. Policy B1 highlights that development proposals should integrate with and take opportunities to expand the local cycle network, and provide traffic free cycle and pedestrian routes where appropriate. It also highlights that opportunities to integrate with existing cycle routes and safeguarded cycle routes should be considered at an early stage of the development design process. This will be further supported by Policy D1, which highlights that development proposals must retain and where appropriate, enhance, public rights of way and the plan's focus on green infrastructure enhancements.
- 5.51 A number of policies within the Neighbourhood Plan also aim to ensure the continued functioning of the existing highways network. For example, Policy B2 states that all development proposals will be required to provide adequate provision for off street parking in accordance with Kent County Council highways guidance. The provisions of this policy will therefore help to limit street parking within the Neighbourhood Plan area and prevent any exacerbation in the issues currently experienced along the highways network, particularly along the single, linear corridor of High Street to Bridge Hill (which is the main route through the centre of Bridge). It also links the Park and Ride facility located along New Dover Road, which is the main connectivity corridor between Bridge and Canterbury city centre.

Conclusions at this current stage

- 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 Patrixbourne / 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.

6. What are the next steps?

- 6.1 This Environmental Report accompanies the submission version of the Bridge Neighbourhood Plan. Following submission to the Local Planning Authority, Canterbury City Council, the Neighbourhood Plan and Environmental Report will be publicised for representations.
- 6.2 At subsequent Independent Examination, the Neighbourhood Plan will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with local planning policy.
- 6.3 If the Independent Examination is favourable, the Bridge Neighbourhood Plan will be subject to a referendum, organised by Canterbury City Council. If more than 50% of those who vote agree with the Neighbourhood Plan, then it will be 'made'. Once made, the Bridge Neighbourhood Plan will become part of the Development Plan for the parish.

Appendix A Context review and baseline

Air Quality

Context Review

Key messages from the National Planning Policy Framework (NPPF) include:

- 'Planning policies should sustain compliance with and contribute towards EU limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and the cumulative impacts on air quality from individual sites in local areas. Planning decisions should ensure that any new development in Air Quality Management Areas is consistent with the local air quality action plan'.
- New and existing developments should be prevented from contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of air pollution.

Released in 2009, the Air Quality Action Plan¹⁴ for Canterbury district details district-wide actions in addition to specific actions for the one AQMA in the district. As there are no AQMAs within the Neighbourhood Plan area boundary, the following district-wide actions are relevant to this SEA theme:

- Delivery of improvements in emissions standards, where practicable;
- Supporting and promoting the Kent-wide car share scheme;
- Exploring the potential for Car Club schemes in Canterbury;
- Improving the Canterbury local cycle route network;
- Working with relevant City Council departments to ensure that air quality is taken into account in the planning process; and
- Delivery of a planning guidance document to assist with air quality assessments for development proposals.

In terms of the local context, Canterbury City Council is required to monitor air quality across the district under Section 82 of the Environment Act (1995), report regularly to Defra and take action where nationally set levels are likely to be exceeded. Monitoring is undertaken to assess levels of nitrogen dioxide, sulphur dioxide, ozone, benzene and particulates. Where exceedances exist, areas are declared as Air Quality Management Areas (AQMAs) and local authorities are required to produce an Action Plan to improve air quality in the area.

Summary of Current Baseline

In fulfilment of Part IV of the Environment Act 1995, Canterbury City Council – as part of the Kent and Medway Air Quality Monitoring Network - released an Annual Report¹⁵ in July 2016, with the report considering all results and relevant data recorded during 2015 within Canterbury district and Kent as a whole. There are currently no AQMAs within the Neighbourhood Plan area, although there is an AQMA located in Canterbury city centre. Air quality in the Parish is therefore generally considered good.

https://www.canterbury.gov.uk/media/63923/air-quality-action-plan.pdf [Accessed 10/04/2017]

¹⁵ Kent and Medway Air Quality Partnership Monitoring Network (2016): 'Kent and Medway Air Quality Monitoring Network – Annual Report 2015', [online] available to download via:

http://www.kentair.org.uk/Pagesfiles/KMAQMN_2015_Annual_Report_AR2015.pdf last accessed [21/04/17]

¹⁴ Canterbury City Council (2009) Air Quality Action Plan [online] available from:

Summary of Future Baseline

The goals of improving district-wide sustainable transport options in the most recent Canterbury District Transport Strategy and Canterbury City Council Air Quality Action Plan might lead to improvements in air quality over a wider area.

Whilst there are no AQMAs within the Neighbourhood Plan area boundary, future development within the Neighbourhood Plan area in combination with the other major housing allocations in the Canterbury District Local Plan could result in a worsening of air quality, particularly along the existing highways network.

However, the goals of improving district-wide sustainable transport options in the most recent Canterbury District Transport Strategy and Canterbury City Council Air Quality Action Plan might lead to improvements in air quality over a wider area.

Biodiversity and Geodiversity

Context Review

At the European level, the EU Biodiversity Strategy¹⁶ was adopted in May 2011 in order to deliver an established new Europe-wide target to '*halt the loss of biodiversity and the degradation of ecosystem services in the EU by 2020*'.

Key messages from the National Planning Policy Framework (NPPF) include:

- Contribute to the Government's commitment to halt the overall decline in biodiversity by minimising impacts and achieving net gains in biodiversity wherever possible.
- Promote the 'preservation, restoration and re-creation of priority habitats, ecological networks' and the 'protection and recovery of priority species'. Plan for biodiversity at a landscape-scale across local authority boundaries.
- Set criteria based policies for the protection of internationally, nationally and locally designated sites, giving weight to their importance not just individually but as a part of a wider ecological network.
- Take account of the effects of climate change in the long term. Adopt proactive strategies to adaptation and manage risks through adaptation measures including green infrastructure (i.e. 'a network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities').
- Plan positively for 'green infrastructure' as part of planning for 'ecological networks'.
- High quality open spaces should be protected or their loss mitigated, unless a lack of need is established.

The Natural Environment White Paper (NEWP)¹⁷ sets out the importance of a healthy, functioning natural environment to sustained economic growth, prospering communities and personal well-being. It was in part a response to the UK's failure to halt and reverse the decline in biodiversity by 2010 and it signalled a move away from the traditional approach of protecting biodiversity in nature reserves to adopting a landscape approach to protecting and enhancing biodiversity. The NEWP also aims to create a green economy in which economic growth and the health of our natural resources sustain each other and markets, business and Government better reflect the value of nature. It includes commitments to:

- Halt biodiversity loss, support functioning ecosystems and establish coherent ecological networks by 2020;
- Establish a new voluntary approach to biodiversity offsetting to be tested in pilot areas;

¹⁶ European Commission (2011) Our life insurance, our natural capital: an EU biodiversity strategy to 2020 [online] available at:
<<u>http://ec.europa.eu/environment/nature/biodiversity/comm2006/pdf/EP_resolution_april2012.pdf</u>> last accessed [10/04/17]
¹⁷ Defra (2012) The Natural Choice: securing the value of nature (Natural Environment White Paper) [online] available at:
<<u>http://www.official-documents.gov.uk/document/cm80/8082/8082.pdf</u>> last accessed [10/04/17]

- Enable partnerships of local authorities, local communities and landowners, the private sector and conservation organisations to establish new Nature Improvement Areas; and
- Address barriers to using green infrastructure to promote sustainable growth.

Reflecting the commitments within the Natural Environment White Paper and the EU Biodiversity Strategy, 'Biodiversity 2020: A strategy for England's wildlife and ecosystem services' aims to 'halt overall biodiversity loss, support healthy well-functioning ecosystems and establish coherent ecological networks, with more and better places for nature for the benefit of wildlife and people'¹⁸.

The emerging Canterbury District Local Plan aims to 'protect and enhance the countryside, acknowledging its own intrinsic value, the diversity of its landscapes, heritage and wildlife and recognising that a high quality rural environment contributes to the economic, social and cultural wellbeing of the District¹⁹. Emerging Local Plan policies provide protection for the nationally designated Kent Downs Area of Outstanding Natural Beauty (AONB) (policy LB1) and protection for sites of international conservation importance (policy LB5), including three Ramsar sites at Stodmarsh, Thanet Coast and Sandwich Bay, and the Swale. Policy LB6 protects Sites of Special Scientific Interest (SSSIs), while policy LB8 includes provision to pursue opportunities for biodiversity improvement in Biodiversity Opportunity Areas. Finally, policy LB9 aims to ensure that development avoids a net loss of biodiversity and/or nature conservation value, especially in areas where there are protected species or links and/or buffers between designated wildlife sites.

Summary of Current Baseline

SSSIs and IRZs

Notified under Section 28 of the Wildlife and Countryside Act 1981, Ileden and Oxenden Woods SSSI is 86.45 ha in size and is located to the east of the Neighbourhood Plan area. The citation for the SSSI states²⁰:

'The site is representative of east Kent plateau woodland on Upper Chalk and thin chalk drifts. The range of soil types present is reflected in the variety of stand types and the diversity of the ground flora. Two of the stand types represented on this site are nationally rare. The rotational coppicing of large areas, combined in a mosaic with high forest stands adds to the structural diversity of the wood and has resulted in the presence of a very rich breeding bird community, including nightingale (17 pairs in 1985) and hawfinch. Two nationally rare plants also occur'.

Based on the most recent condition assessment, 85.35% of the SSSI has been classified as 'favourable', while 14.65% is classified as 'unfavourable – recovering'.

SSSI Impact Risk Zones (IRZ) are a GIS tool/dataset which maps zones around each SSSI according to the particular sensitivities of the features for which it is notified. They specify the types of development that have the potential to have adverse impacts at a given location. Natural England is a statutory consultee on development proposals that might impact on SSSIs. The Neighbourhood Plan area does not fall within the SSSI Impact Risk Zones (IRZ) for the Ileden and Oxenden Woods SSSI.

Notified under Section 28 of the Wildlife and Countryside Act 1981, Chequer's Wood and Old Park SSSI is 106.7 ha in size and is located to the north of the Neighbourhood Plan area. The citation for the SSSI states²¹:

'The woodland in the valley is a good example of a base-rich springline alder wood. Unimproved acidic grassland is present on the dry sandy plateau in the western part of the site. In addition a

consult.limehouse.co.uk/portal/cdlp_2014/cdlp_publication_2014?pointId=1394624366172#section-1394624366172> last accessed [10/04/2017]

²⁰ Natural England (no date): 'Ileden and Oxenden SSSI', [online] available via: <

¹⁸ DEFRA (2011): 'Biodiversity 2020: A strategy for England's wildlife and ecosystem services', [online] Available to download from: <<u>https://www.gov.uk/government/publications/biodiversity-2020-a-strategy-for-england-s-wildlife-and-ecosystem-</u>

services> last accessed [16/04/17] ¹⁹ Canterbury District Local Plan, chapter 6. [online] available at: <u>http://canterbury-</u>

http://www.sssi.naturalengland.org.uk/citation/citation_photo/1004508.pdf => last accessed 12/04/17] ²¹ Natural England (no date) Chequer's Wood and Old Park SSSI [online] available via: <

https://necmsi.esdm.co.uk/PDFsForWeb/Citation/1003485.pdf> last accessed 12/04/2017]

variety of other habitats are present including pedunculate oak-birch woodland, dense scrub and a pond. Some uncommon plants occur and the area also supports a diverse breeding bird community.

The mosaic of grassland, scrub and woodland gives this site considerable interest. The acidic sandy soils of the plateau contrast with the base-rich peaty soils of the valley bottom. There is consequently a wide variety of plants present'.

The most recent condition assessment suggests that 68.32% of the SSSI is in 'favourable' condition, while 31.68% is in 'unfavourable – recovering' condition.

The northern third of the Neighbourhood Plan area falls within the IRZ for the Chequer's Wood and Old Park SSSI. Development proponents should therefore consults Natural England on risks to the SSSI from infrastructure, oil and gas, air pollution, combustion and discharges.

Larkey Valley Wood SSSI was notified in 1985 under Section 28 of the Wildlife and Countryside Act 1981, and is 44.09 ha in size. It lies to the west of the Neighbourhood Plan area. The citation for the SSSI states²²:

'Ash-maple coppice is the predominant woodland type on the slopes of this dry chalk valley. This grades into beech high forest on the thin calcareous soils of the upper slopes with hornbeam coppice on the deeper soils in the valley bottom. The varied ground flora includes a number of uncommon plants. The wood also supports many breeding birds.

The ash-maple woodland has a varied coppice layer under pedunculate oak standards. While ash and hazel are the most common coppiced species, field maple, birch, sweet chestnut and wild cherry are also present and hawthorn is a common shrub. In the valley bottom the coppice is more uniform. Hornbeam and hazel are the predominant coppiced species with occasional ash and field maple and a few oak standards. The high forest on the upper slopes is dominated by mature beech with some oak. The shrub layer under the beech is sparse in heavily shaded areas but elsewhere, especially along the woodland edge, there is a variety of species including wild privet, spindle and wayfaring tree; shrubs characteristic of chalk soils'.

Based on the most recent condition assessment, 100% of the SSSI has been classified as 'favourable', The Neighbourhood Plan area does not fall within the SSSI Impact Risk Zones (IRZ) for the Larkey Valley Wood SSSI.

Finally, Lysnore Bottom SSSI was notified under Section 28 of the Wildlife and Countryside Act 1981 in 1985. The SSSI is due south of the Neighbourhood Plan area, and is approximately 70 ha in size. The citation for the SSSI states²³:

'This is a good example of a traditional coppice-with-standards woodland containing a variety of tree species. Ash-maple and pedunculate oak-hornbeam stands are the main woodland types on the eastern side of the valley. On the western slopes there is ash and sweet chestnut coppice, both with pedunculate oak standards. The site is also noted for the presence of several uncommon plants, particularly the lady orchid Orchis purpurea, a species restricted in Britain to Kent.

The eastern woodlands, Fryarne Park Wood and Mill Bank, are the most varied. Hazel and ash are the most common coppiced species on the chalk soils of the lower slopes with ash and hornbeam on the clay-with-flints soils of the upper slopes. Pedunculate oak and beech standards are present throughout. Other species include birch, field maple, whitebeam and shrubs such as wayfaring tree'.

Based on the most recent condition assessment, 4.62% of the SSSI has been classified as 'favourable'; 61.74% has been classified as 'unfavourable – recovering' and 33.65% as 'unfavourable – no change'. The Neighbourhood Plan area does not fall within the SSSI IRZ for Lysnore Bottom SSSI.

²² Natural England (no date) Larkey Valley Wood SSSI [online] available via: <</p>

https://necmsi.esdm.co.uk/PDFsForWeb/Citation/1000011.pdf> last accessed 12/04/2017]

²³ Natural England (no date) Lysnore Bottom SSSI [online] available via:

http://www.sssi.naturalengland.org.uk/citation/citation_photo/1000164.pdf [last accessed 12/04/2017]



Locally Important Sites

Whitehill Wood and Lower Hardres (79.82 ha), and the River Nail Bourne (13.27 ha) are both Local Wildlife Sites within the Neighbourhood Plan area. Local Wildlife Sites (LWS)'support threatened habitats, such as chalk grassland or ancient woodland' and seek to create a better connected landscape of wildlife buffers, corridors and stepping stones²⁴. They are seen as integral in meeting both local and national targets for biodiversity conservation.

BAP Priority Habitats

In regards to BAP Priority Habitats, there is one small area of Ancient and Semi-Natural Woodland in the Neighbourhood Plan area at Whitehill Wood, as well as Deciduous Woodland. In addition, there are small areas of the following BAP Priority Habitats:

- Wood pasture and parkland; and
- Broadleaved woodland.

Summary of Future Baseline

Habitats and species have the potential to come under increasing pressures from housing and infrastructure development in the Neighbourhood Plan area, including the nationally and locally designated sites. This includes a loss of habitats and impacts on biodiversity networks. This may be exacerbated by the effects of climate change, which has the potential to lead to changes in the distribution and abundance of species and changes to the composition and character of habitats.

²⁴ Kent Wildlife Trust (2017): 'Local Wildlife Sites', [online] available to view via: http://www.kentwildlifetrust.org.uk/what-we-do/local-wildlife-sites> last accessed [21/04/17]



Climate Change

Context Review

The UK Climate Change Risk Assessment is published on a 5-yearly cycle in accordance with the requirements of the Climate Change Act 2008. It required the Government to compile an assessment of the risks for the UK arising from climate change, and then to develop an adaptation programme to address those risks and deliver resilience to climate change on the ground. For both the 2012 and the 2017 UK Climate Change Risk Assessment, the Adaptation Sub-Committee commissioned an evidence report to achieve the following:

• 'Based on the latest understanding of current, and future, climate risks and opportunities, vulnerability and adaptation, what should the priorities be for the next UK National Adaptation Programme?²⁵

The evidence report contains six priority risk areas requiring additional action in the next five years, see below:

- 1. Flooding and coastal change risks to communities, businesses and infrastructure;
- 1. Risks to health, well-being and productivity from high temperatures;
- 2. Risk of shortages in the public water supply, and for agriculture, energy generation and industry;
- 3. Risks to natural capital, including terrestrial, coastal, marine and freshwater ecosystems, soils and biodiversity;
- 4. Risks to domestic and international food production and trade; and
- 5. New and emerging pests and diseases, and invasive non-native species, affecting people, plants and animals

The UK Climate Change Act²⁶ was passed in 2008 and established a framework to develop an economically credible emissions reduction path. It also highlighted the role it would take in contributing to collective action to tackle climate change under the Kyoto Protocol, and more recently as part of the UN-led Paris Agreement.

The Climate Change Act includes the following:

- 2050 Target. The Act commits the UK to reducing emissions by at least 80% in 2050 from 1990 levels.
- Carbon Budgets. The Act requires the Government to set legally binding 'carbon budgets'. A carbon budget is a cap on the amount of greenhouse gases emitted in the UK over a five-year period. The carbon budgets are designed to reflect the cost-effective path to achieving the UK's long-term objectives. The first five carbon budgets have been put into legislation and run up to 2032.
- The Committee on Climate Change was set up to advise the Government on emissions targets, and report to Parliament on progress made in reducing greenhouse gas emissions.
- The National Adaptation Programme requires the Government to assess the risks to the UK from climate change, prepare a strategy to address them, and encourage key organisations to do the same. For more detail, visit the UK adaptation policy page²⁷.

Key messages from the National Planning Policy Framework (NPPF) include:

• Support the transition to a low carbon future in a changing climate as a 'core planning principle'.

²⁵ GOV UK: 'UK Climate Change Risk Assessment Report January 2017', [online] available to download from:

<<u>https://www.gov.uk/government/publications/uk-climate-change-risk-assessment-2017</u>> last accessed [15/03/17] ²⁶ GOV.UK (2008): 'Climate Change Act 2008', [online] accessible via <<u>http://www.legislation.gov.uk/ukpga/2008/27/contents</u>> last accessed [20/03/17]

²⁷ Committee on Climate Change (2017): 'UK Adaptation Policy' [online] accessible via <<u>https://www.theccc.org.uk/tackling-</u> <u>climate-change/preparing-for-climate-change/uk-adaptation-policy/</u>> last accessed [17/04/17]

- There is a key role for planning in securing radical reductions in greenhouse gas (GHG) emissions, including in terms of meeting the targets set out in the Climate Change Act 2008²⁸. Specifically, planning policy should support the move to a low carbon future through:
 - Planning for new development in locations and ways which reduce GHG emissions;
 - Actively supporting energy efficiency improvements to existing buildings;
 - Setting local requirements for building's sustainability in a way that is consistent with the Government's zero carbon buildings policy;
 - Positively promoting renewable energy technologies and considering identifying suitable areas for their construction; and
 - Encouraging those transport solutions that support reductions in GHG emissions and reduce congestion.
- Direct development away from areas highest at risk of flooding, with development 'not to be allocated if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding'. Where development is necessary, it should be made safe without increasing levels of flood risk elsewhere.
- Take account of the effects of climate change in the long term, taking into account a range of factors including flooding. Adopt proactive strategies to adaptation and manage risks through adaptation measures including well planned green infrastructure.

The Flood and Water Management Act²⁹ highlights that alternatives to traditional engineering approaches to flood risk management include:

- Incorporating greater resilience measures into the design of new buildings, and retro-fitting properties at risk (including historic buildings);
- Utilising the environment in order to reduce flooding, for example through the management of land to reduce runoff and through harnessing the ability of wetlands to store water;
- Identifying areas suitable for inundation and water storage to reduce the risk of flooding elsewhere;
- Planning to roll back development in coastal areas to avoid damage from flooding or coastal erosion; and
- Creating sustainable drainage systems (SuDS)³⁰

Further guidance is provided in the document 'Planning for SuDs'.³¹ This report calls for greater recognition of the multiple benefits that water management can present. It suggests that successful SuDS are capable of 'contributing to local quality of life and green infrastructure'.

Flood Risk Management Plans (FRMP) explain the risk of flooding from rivers, the sea, surface water, groundwater and reservoirs, in addition to setting out how risk management authorities will work with communities to manage flood and coastal risk, usually over 6-year cycles. At the regional level, the most recent FRMP for the South East³² covers the period 2015-2021, with the South East River Basin Management Plan³³ (SERBMP) (2015) developed alongside the FRMP to form an important part of a collaborative and integrated approach to catchment planning for water. The following social, economic and environmental objectives from the FRMP for the South East are relevant:

³¹ CIRIA (2010) 'Planning for SuDs – making it happen' [online] available to access via

<http://www.ciria.org/Resources/Free_publications/Planning_for_SuDS_ma.aspx> last accessed [14/03/17]

 $^{^{28}}$ The Climate Change Act 2008 sets targets for greenhouse gas (GHG) emission reductions through action in the UK of at least 80% by 2050, and reductions in CO₂ emissions of at least 26% by 2020, against a 1990 baseline.

²⁹ Flood and Water Management Act (2010) [online] available at: <u>http://www.legislation.gov.uk/ukpga/2010/29/contents</u>

³⁰ N.B. The provision of Schedule 3 to the Flood and Water Management Act 2010 came into force on the 1st of October 2012 and makes it mandatory for any development in England or Wales to incorporate SuDs.

³² Environment Agency (2015): 'South East River Basin District Flood Risk Management Plan', [online] available to download via:

<https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/507134/LIT_10220_SOUTH_EAST_FRMP_SU MMARY_DOCUMENT.pdf > last accessed [13/04/2017]

³³ DEFRA & Environment Agency (2016): 'South East River Basin District River Basin Management Plan', [online] available to download via:

<https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/500473/South_East_RBD_Part_1_river_basin_ management_plan.pdf> last accessed [17/04/17]

- Minimise impact to people, property and to critical infrastructure and services from all sources of flooding and coastal erosion, increasing the focus on community resilience;
- Protect and enhance sustainable recreational and amenity opportunities where appropriate, recognising the important contribution of income from these activities to river and coastal management;
- Minimise flood risk impact to the local economy, and seek opportunities to promote economic growth, regeneration and partnership funding;
- Ensure development in areas at risk of flooding is appropriate, does not increase flood risk and reduces risk wherever possible. Promote the use of sustainable drainage systems in development to help reduce pressure on existing drainage networks;
- Conserve and enhance biodiversity, internationally and nationally designated nature conservation sites, and promote opportunities to create freshwater habitat when managing flood risk;
- Support climate change adaptation by making space for water, both inland and at the coast;
- Increase partnership working between risk management authorities, communities, landowners and other groups/organisations in the management of flood and coastal erosion risk; and
- Continue appropriate and affordable levels of river, watercourse, tidal and coastal defence maintenance to reduce the risk of flooding to people and property.

In relation to the emerging Canterbury District Local Plan, Chapter 7 (Climate Change, Flooding, Coastal Change and Water Resources) Policy CC1 'Renewable Energy and Low Carbon Development' and Policy CC2 'Reducing Carbon Emissions from New Development' directly relate to the Climate Change SEA theme.

Summary of Current Baseline

Contribution to Climate Change

In relation to GhG emissions, source data from the Department of Energy and Climate Change indicates that Canterbury District has had consistently lower per capita emissions total than that of both the South East and England as a whole since 2005. However, Canterbury has observed a smaller percentage decrease in total CO_2 emissions per capita between 2005 and 2012 (14.5%) in comparison to the South East of England (15.9%) and England (16.6%).

Potential effects of climate change

The outcome of research on the probable effects of climate change in the UK was released in 2009 by the UK Climate Projections (UKCP09) team³⁴. UKCP09 gives climate information for the UK up to the end of this century and projections of future changes to the climate are provided, based on simulations from climate models. Projections are broken down to a regional level across the UK and are shown in probabilistic form, which illustrate the potential range of changes and the level of confidence in each prediction.

As highlighted by the research, the effects of climate change for the South East of England by 2050 for a medium emissions scenario³⁵ are likely to be as follows:

- The central estimate of increase in winter mean temperature is 2.2°C and an increase in summer mean temperature of 2.8°C; and
- The central estimate of change in winter mean precipitation is 16% and summer mean precipitation is –19%.

Resulting from these changes, a range of risks may exist for the Neighbourhood Plan area. These include:

- Effects on water resources from climate change;
- Reduction in availability of groundwater for abstraction;

 ³⁴ The data was released on 18th June 2009: See: <<u>http://ukclimateprojections.metoffice.gov.uk/</u>> last accessed [14/03/17]
 ³⁵ UK Climate Projections (2009) South East 2050s Medium Emissions Scenario [online] available at:
 <<u>http://ukclimateprojections.metoffice.gov.uk/23907?emission=medium</u>> last accessed [10/04/17]

- Adverse effect on water quality from low stream levels and turbulent stream flow after heavy rain;
- Increased risk of flooding, including increased vulnerability to 1:100 year floods;
- A need to increase the capacity of wastewater treatment plants and sewers;
- A need to upgrade flood defences;
- Soil erosion due to flash flooding;
- Loss of species that are at the edge of their southerly distribution;
- Spread of species at the northern edge of their distribution;
- Increased demand for air-conditioning;
- Increased drought and flood related problems such as soil shrinkages and subsidence;
- Risk of road surfaces melting more frequently due to increased temperature; and
- Flooding of roads.

Flood Risk

Land adjacent to the Nail Bourne is within Flood Zone 3 (medium-high risk of fluvial flooding) meaning that they are classified as having a 1% or greater chance (1 in 100 chance) of being affected by river flooding in any given year. In addition, some areas along the Nail Bourne fall within Flood Zone 2 (low-medium risk) meaning that they are classified as having a 0.1-1% chance (1 in 1000 to 1 in 100 chance) of being affected by river flooding in any given year.

Surface water drainage and sewer flooding is also a risk for some parts of the Neighbourhood Plan area. Highlighted in Figure 4.2, land directly adjacent to the Nail Bourne, along with land along Pett Bottom Road, is at medium-high and/or medium-low risk.

Based on the most recent Strategic Flood Risk Assessment³⁶ for Canterbury City Council, published in 2011, there are no Critical Drainage Areas within the Neighbourhood Plan area, and hence there are no surface water management plans currently in place.

Summary of Future Baseline

Climate change has the potential to increase the occurrence of extreme weather events in the Neighbourhood Plan area, with increases in mean summer and winter temperatures, increases in mean precipitation in winter and decreases in mean precipitation in summer. This is likely to increase the risks associated with climate change (including fluvial flooding) with an increased need for resilience and adaptation.

In terms of climate change mitigation, per capita emissions are likely to continue to decrease as energy efficiency measures, renewable energy production and new technologies become more widely adopted. However, future development will comprise an increase in the built footprint of the Neighbourhood Plan area, which may lead to a future increase in overall emissions.

A number of policies within the emerging Canterbury District Local Plan seek to increase the uptake of renewable energy and improve the provision of public and sustainable transport. The effective implementation of such policies has the potential to reduce future emissions within the Neighbourhood Plan area.

Landscape and Historic Environment

Context Review

Key messages from the National Planning Policy Framework (NPPF) include:

• Protect and enhance valued landscapes, giving particular weight to those identified as being of national importance.

³⁶ Canterbury City Council (2011): 'Strategic Flood Risk Assessment – August 2011', [online] available to download via: <https://www.canterbury.gov.uk/media/942426/CDLP-121-Strategic-Flood-Risk-Assessment-August-2011-Herrington-CCC.pdf > last accessed [13/04/17]

- Heritage assets should be recognised as an 'irreplaceable resource' that should be conserved in a 'manner appropriate to their significance', taking account of 'the wider social, cultural, economic and environmental benefits' of conservation, whilst also recognising the positive contribution new development can make to local character and distinctiveness.
- Set out a 'positive strategy' for the 'conservation and enjoyment of the historic environment', including those heritage assets that are most at risk.
- Develop 'robust and comprehensive policies that set out the quality of development that will be expected for the area. Such policies should be based on stated objectives for the future of the area and an understanding and evaluation of its defining characteristics'.
- Consider the effects of climate change in the long term, including in terms of landscape. Adopt . 'proactive strategies' to adaptation and manage risks through adaptation measures including well planned green infrastructure.

The Government's Statement on the Historic Environment for England³⁷ sets out its vision for the historic environment. It calls for those who have the power to shape the historic environment to recognise its value and to manage it in an intelligent manner in light of the contribution that it can make to social, economic and cultural life.

Areas of Outstanding Natural Beauty (AONBs) aim primarily to conserve and enhance the natural beauty of the landscape. They also aim to 'meet the need for quiet enjoyment of the countryside, and to have regard for the interests of those who live and work there'³⁸. The 2014-2019 Management Plan for the Kent Downs AONB aims to keep the 'qualities and distinctive features of the Kent Downs AONB, the dramatic south-facing scarp, secluded dry valleys, network of tiny lanes, isolated farmsteads, churches and oasts, orchards, dramatic cliffs, the ancient woodlands and delicate chalk grasslands along with the ancient, remote and tranquil qualities' valued, secured and strengthened³⁹.

In relation to the emerging Canterbury District Local Plan, Policy HE1 'Historic Environment and Heritage Assets' directly relates to this SEA theme. Additionally, the following policies within the emerging Local Plan are relevant:

- Policy HE5 Development Affecting and Changes to Listed Buildings;
- Policy HE6 Conservation Areas; •
- Policy HE8 Heritage Assets in Conservations Areas;
- Policy H11 Archaeology; .
- Policy H12 Area of Archaeological Interest; and
- Policy H13 Historic Landscapes, Parks and Gardens.

Summary of Current Baseline

Landscape

The Kent Downs were designated as an AONB in 1968 under the National Parks and Access to Countryside Act 1949. Following the introduction of the Countryside and Rights of Way Act 2000, the government confirmed that the landscape qualities of National Parks and AONBs are equivalent. As such the protection given by the land use planning system to natural beauty in both types of area should be equivalent.

The majority of the Neighbourhood Plan area is located within the AONB.

Key features of the Kent Downs AONB include:

³⁹ Kent Downs AONB (2014): @Management Plan 2014-2019', [online] available to download via: http://www.kentdowns.org.uk/uploads/documents/KD_AONB_final_plan_09.09.14.compressed.pdf> last accessed [21/04/2017]

³⁷ HM Government (2010) The Government's Statement on the Historic Environment for England [online] available at: <http://webarchive.nationalarchives.gov.uk/+/http://www.culture.gov.uk/reference_library/publications/6763.aspx> last accessed

^[15/03/17] ³⁸ Landscapes for Life (2017): 'Areas of Outstanding Natural Beauty', [online] available to download via:

http://www.landscapesforlife.org.uk/further-information-about-aonbs.html > last accessed [21/04/2017]

- Dramatic white chalk cliffs at Dover and Folkestone;
- Orchards, hop gardens, and cobnut platts;
- Ancient woodlands and chalk grassland; and
- Castles, isolated farmsteads and networks of small lanes.

National Character Areas (NCAs) are landscape areas which share similar characteristics, following natural lines in the landscape rather than administrative boundaries. Developed by Natural England, NCA profiles describe the natural and cultural features that shape each of these landscapes, providing a broad context to its character. The Neighbourhood Plan area is located within the North Downs NCA. The following characteristics from the NCA profile are particularly relevant:

NCA 119: North Downs⁴⁰

- Traditional, small, nucleated villages, scattered farms, and large houses with timber framing, flint walls and Wealden brick detailing;
- A chain of chalk hills extending from the Hog's Back in Surrey to the White Cliffs of Dover; •
- A broad dip slope that gradually drops towards the Thames and the English Channel;
- Deep valleys cut by the Rivers Stour, Medway, Darent, Wey and Mole; •
- Large tracts of mixed arable and horticultural production; and .
- Woodland, including ancient woodland, and species-rich chalk grasslands.

Historic Environment

The Neighbourhood Plan area has a rich historic environment. Numerous features are recognised through historic environment designations, including the statutory listed buildings and scheduled monuments, which are nationally designated.

Historic England is the statutory consultee for certain categories of listed building consent and all applications for scheduled monument consent. The historic environment is protected through the planning system, via conditions imposed on developers and other mechanisms. The Neighbourhood Plan area contains no Grade I listed buildings, two Grade II* and 41 Grade II listed buildings.

The Grade II* listed buildings are as follows:

- Bridge Place; and
- Church of St. Peter.

Scheduled monuments are sites of national importance and protected by the Ancient Monuments and Archaeological Areas Act 1979. According to the National Heritage List for England⁴¹, there is one scheduled monument in the Neighbourhood Plan area, listed below:

Anglo-Saxon cemetery on Hanging Hill, immediately south west of Watling Street.

There are no registered battlefields or registered parks and gardens within the Neighbourhood Plan area. Historic parks and gardens are noted as a fragile and finite resource by Historic England⁴², as they can easily be damaged beyond repair or lost forever.

Parts of Bridge are designated a conservation area ⁴³. The conservation covers the length of Bridge village, including several properties in the High Street, Bridge Hill and Patrixbourne Road. Conservation area appraisals are a tool to demonstrate the area's special interest, explaining the reasons for designation and providing a greater understanding and articulation of its character.

⁴⁰ Natural England (2014): 'NCA Profile 113: North Kent Plain', [online] available to download via:

http://publications.naturalengland.org.uk/publication/2900242?category=587130 last accessed [13/04/17]
⁴¹ Historic England: National Heritage List for England: http://list.historicengland.org.uk last accessed [17/03/2017.] ⁴² Historic England (2017): 'Registered Parks and Gardens' [online] available at:

https://www.historicengland.org.uk/listing/what-is-designation/registered-parks-and-gardens/ last accessed [10/04/17] ⁴³ Canterbury City Council (2017): 'Designated Conservation Areas' [online] available at:

<https://www.canterbury.gov.uk/planning/find-out-if-you-need-planning-permission/designated-conservation-areas/>last accessed [21/04/2017]

Ideally, appraisals should be regularly reviewed as part of the management of the conservation area, and can be developed into a management plan. As of April 2017, a conservation area appraisal or management plan has not been prepared for the Bridge Conservation Area.

Since 2008, Historic England has released an annual Heritage at Risk Register. The Heritage at Risk Register highlights the Grade I, Grade II and Grade II* listed buildings, and scheduled monuments, conservation areas, wreck sites and registered parks and gardens in England deemed to be 'at risk'. The latest Heritage at Risk Register⁴⁴ (2016) includes none of the listed buildings and scheduled monuments located within the Neighbourhood Plan boundary. However it should be recognised that the Grade II listed buildings have not been appraised in relation to whether they should be deemed to be 'at risk', and, given the lack of a conservation area appraisal, the Bridge Conservation Area has also not been evaluated.

It should be noted that not all of the area's historic environment features are subject to statutory designations, and non-designated features comprise a large part of what people have contact with as part of daily life – whether at home, work or leisure. Although not designated, many buildings and areas of historic interest and character are seen as important by local communities.

Summary of Future Baseline

New development has the potential to lead to small, but incremental changes in landscape and townscape character and quality in and around the Neighbourhood Plan area; for instance, through the loss of landscape features and visual impact. However, new development need not be harmful to the significance of a heritage asset, and in the context of the Neighbourhood Plan area there is opportunity for new development to enhance the historic setting of the key features and areas and better reveal assets' cultural heritage significance.

Additionally, new development areas in the Neighbourhood Plan area have the potential to impact on the fabric and setting of cultural heritage assets; for example, through inappropriate design and layout. It should be noted, however, that existing historic environment designations, the provisions of the NPPF and policies within the emerging Canterbury District Local Plan offer a degree of protection to cultural heritage assets and their settings.

⁴⁴ Historic England (2016): 'Heritage at Risk Register: South East' [online] available to access via: <<u>https://historicengland.org.uk/images-books/publications/har-2016-registers/</u>> last accessed [10/04/17]



Land, Soil and Water Resources

Context Review

The EU's Soil Thematic Strategy⁴⁵ presents a strategy for protecting soils resources in Europe. The main aim of the strategy is to minimise soil degradation and limit associated detrimental effects linked to water quality and quantity, human health, climate change, biodiversity, and food safety.

The EU Water Framework Directive (WFD) drives a catchment-based approach to water management. In England and Wales there are 100 water catchments and it is Defra's intention is to establish a 'framework for integrated catchment management' across England. The Environment Agency is establishing 'Significant Water Management Issues' and recently presented second River Basin Management Plans to ministers. The plans seek to deliver the objectives of the WFD namely:

- Enhance the status and prevent the further deterioration of aquatic ecosystems and associated wetlands which depend on aquatic ecosystems;
- Promote the sustainable use of water;
- Reduce the pollution of water, especially by 'priority' and 'priority hazardous' substances; and
- Ensure the progressive reduction of groundwater pollution.

Key messages from the National Planning Policy Framework (NPPF) include:

- Protect and enhance soils. The value of best and most versatile agricultural land should also be taken into account.
- Prevent new or existing development from being 'adversely affected' by the presence of 'unacceptable levels' of soil pollution or land instability and be willing to remediate and mitigate 'despoiled, degraded, derelict, contaminated and unstable land, where appropriate'.
- Encourage the effective use of land' through the reuse of land which has been previously developed, 'provided that this is not of high environmental value'. Whilst there is no longer a national requirement to build at a minimum density, the NPPF requires local planning authorities to 'set out their own approach to housing density to reflect local circumstances'.
- Produce strategic policies to deliver the provision of a variety of infrastructure, including that necessary for water supply.
- With regards to waste, the NPPF does not contain any specific waste policies as waste planning policy will be published as part of the National Waste Management Plan.

Other key documents at the national level include Safeguarding our Soils: A Strategy for England⁴⁶, which sets out a vision for soil use in England, and the Water White Paper⁴⁷, which sets out the Government's vision for a more resilient water sector. It states the measures that will be taken to tackle issues such as poorly performing ecosystems, and the combined impacts of climate change and population growth on stressed water resources. In terms of waste management, the Government Review of Waste Policy in England⁴⁸ recognises that environmental benefits and economic growth can be the result of a more sustainable approach to the use of materials.

In relation to the emerging Canterbury District Local Plan, Chapter 7 ('Climate Change, Flooding, Coastal Change and Water Resources') includes Policy CC13 Water Resources, which relates directly to the SEA theme.

Summary of Current Baseline

Quality of Agricultural Land

⁴⁵ European Commission (2006) Soil Thematic Policy [online] available at: <<u>http://ec.europa.eu/environment/soil/index_en.htm</u>> last accessed [17/03/17]

⁴⁶ Defra (2009) Safeguarding our Soils: A strategy for England [online] available to download from:

https://www.gov.uk/government/publications/safeguarding-our-soils-a-strategy-for-england> last accessed [16/03/17]

⁴⁷ Defra (2011) Water for life (The Water White Paper) [online] available at <<u>http://www.official-</u>

documents.gov.uk/document/cm82/8230/8230.pdf> last accessed [16/03/17] ⁴⁸ Defra (2011) Government Review of Waste Policy in England [online] available at:

http://www.defra.gov.uk/publications/files/pb13540-waste-policy-review110614.pdf> last accessed [16/03/17]

The Agricultural Land Classification classifies land into six grades (plus 'non-agricultural' and 'urban'), where Grades 1 to 3a are recognised as being the 'best and most versatile' land and Grades 3b to 5 are of poorer quality. In terms of the location of the best and most versatile agricultural land, there are areas of both Grade 1 and Grade 2 Agricultural Land along the northern border of the Neighbourhood Plan area, and also in the south-eastern corner.

Watercourses

The main watercourse flowing through the Neighbourhood Plan area is the Nail Bourne, which flows through Bridge in the eastern side of the Parish.

Groundwater Source Protection Zones (SPZs) have been defined by the Environment Agency in England and Wales to protect groundwater sources such as wells, boreholes and springs that are used for public drinking water supply. The zones show the risk of contamination from activities that might cause groundwater pollution. As of April2017, there is a Zone 3 SPZ over half the Neighbourhood Plan area that stretches from its south-western to north-eastern corner.

The Nitrates Directive (91/676/EEC) requires Member States to identify areas where groundwater has nitrate concentrations of more than 50 mg/l nitrate or is thought to be at risk of nitrate contamination. Areas associated with such groundwater are designated as Nitrate Vulnerable Zones (NVZs) within which Member States are required to establish Action Programmes in order to reduce and prevent further nitrate contamination. NVZs for 2017-2020 started on January 1st 2017⁴⁹, with most of the north-western corner of the Neighbourhood Plan area designated as a Groundwater NVZ area, defined as water held underground in the soil or in pores and crevices in rock, which has or could have if action is not taken, a nitrate concentration greater than 50mg/l.

Summary of Future Baseline

Due to increasing legislative and regulatory requirements, there are increasing pressures to improving recycling and composting rates.

In terms of water quality, the requirements of the Water Framework Directive are likely to lead to continued improvements to water quality in watercourses in the wider area. Water quality has the potential to be affected by pollution incidents in the area, the presence of non-native species and future physical modifications to water bodies.

Population and Community

Context Review

Key messages from the National Planning Policy Framework (NPPF) include:

- To 'boost significantly the supply of housing', local planning authorities should meet the 'full, objectively assessed need for market and affordable housing' in their area. They should prepare a Strategic Housing Market Assessment to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries. The Strategic Housing Market Assessment should identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period.
- With a view to creating 'sustainable, inclusive and mixed communities' authorities should ensure provision of affordable housing onsite or externally where robustly justified.
- In rural areas, when exercising the duty to cooperate with neighbouring authorities, local planning authorities should be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate. Authorities should consider whether allowing some market housing would facilitate the provision of affordable housing to meet local needs.
- The NPPF attaches great importance to the design of the built environment. It explains how good design is a key aspect in sustainable development, and how development should improve the

⁴⁹ GOV.UK (2017): 'Nutrient Management: Nitrate Vulnerable Zones' [online] available to access via: <<u>https://www.gov.uk/guidance/nutrient-management-nitrate-vulnerable-zones</u>> last accessed [17/03/17] quality of the area over its lifetime, not just in the short term. Good architecture and landscaping are important, with the use of design codes contributing to the delivery of high quality outcomes. Design should reinforce local distinctiveness, raise the standard more generally in the area and address the connections between people and places.

- The social role of the planning system involves 'supporting vibrant and healthy communities'.
- The planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities
- Promote the retention and development of local services and community facilities such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship.
- Ensure that developments create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion. Places should contain clear and legible pedestrian routes, and high quality public spaces, which encourage the active and continual use of public areas.
- Ensuring that there is a 'sufficient choice of school places' is of 'great importance' and there is a need to take a 'proactive, positive and collaborative approach' to bringing forward 'development that will widen choice in education'.

The 'Ready for Ageing?' report, published by the Select Committee on Public Service and Demographic Change⁵⁰ warns that society is underprepared for an ageing population. The report states that *'longer lives can be a great benefit, but there has been a collective failure to address the implications and without urgent action this great boon could turn into a series of miserable crises'.* The report recognises that the supply of specialist housing for the older generation is insufficient for the demand. There is a need for central and local Government, housing associations, and house builders to ensure that these housing needs are better addressed, giving as much priority to promoting an adequate market of social housing for the older generation as is given to the younger generation.

Summary of Current Baseline

Population

Between 2001 and 2011 the population of Bridge increased by 7.4%, significantly lower than the 11.7% average for the district but in line with the regional and national rate of 7.9%

Age Structure

26.6% of individuals within Bridge are between 0-24 years of age, significantly lower than the values for Canterbury District (35.1%), the South East (30.2%) and England (30.8%). Additionally, there is a higher proportion of individuals in Bridge aged 60+ in comparison to the District, regional and national levels. The working population of Bridge (aged 25-59) is 36.4%, lower than the values for Canterbury (39.7%), the South East (46.4%) and England (46.9%).

Household Deprivation

Census statistics measure deprivation across four 'dimensions' of deprivation, summarized below:

- **Employment**: Any person in the household (not a full-time student) that is either unemployed or long-term sick.
- **Education:** No person in the household has at least a level 2 qualification and no person aged 16-18 is a full-time student.
- **Health and Disability:** Any person in the household that has generally 'bad' or 'very bad' health, or has a long term health problem.
- **Housing:** The household accommodation is either overcrowded (with an occupancy rating of -1 or less), in a shared dwelling or has no central heating.

⁵⁰ Select Committee on Public Service and Demographic Change (2013) Ready for Ageing? [online] available at: <<u>http://www.parliament.uk/business/committees/committees-a-z/lords-select/public-services-committee/report-ready-for-ageing/</u>> last accessed [18/04/17]

In this context, 49.6% of households within Bridge are deprived in at least one dimension. This value is lower than the trend for Canterbury (55.9%), similar to the trend for the South East (52.3%) and notably lower than the trend for England (57.5%). Therefore, as a whole, the Neighbourhood Plan area contains fewer households which are deprived in comparison to the national average.

Housing Tenure

Within the Neighbourhood Plan area, 72.6% of residents either own their home outright or with a mortgage, significantly higher than the values for Canterbury district (66.0%), the South East (67.6%) and England (63.3%). Notably, fewer residents within the Neighbourhood Plan area are living in socially or privately rented properties (25%) than in Canterbury (31.7%), the South East (30%) and England (34.5%). Furthermore, 2.1% of residents within the Neighbourhood Plan area are living rent free, which is slightly higher than the local, regional and national trends.

Education

Within the Neighbourhood Plan area there is a significantly higher number of residents with a Level 4 Qualification and above (36.5%) than Canterbury District (27.3%), the South East (29.9%) and England (27.4%). Conversely, the number of residents within the Neighbourhood Plan area with No Qualifications (21.6%) generally aligns with the local and national average, however is notably higher than the South East average (19.1%). For Level 2 Qualifications and Apprenticeships, the number of residents with this level of education within Neighbourhood Plan area aligns with the local, regional and national averages. Notably, the number of residents with Level 1 Qualifications (9.0%) and Level 3 Qualifications (9.9%) within the Neighbourhood Plan area is markedly less than the local, regional and national averages. For Level 3 Qualifications, the Neighbourhood Plan area value is 7.7% less than the Canterbury district average.

Employment

69.4% of residents within the Neighbourhood Plan area are in employment, which is higher than the employment figures for Canterbury District (58.7%), the South East (67.9%) and England (64.7%). The majority of residents within the Neighbourhood Plan area are employed within Professional occupations (22.8%), which is higher than the values for Canterbury district (20.5%), the South East (18.7%) and England (17.5%). There are also a notably higher percentage of residents employed as Managers, Directors and Senior Officials within the Neighbourhood Plan area (14.3%) than the local, regional and national averages. The least employed occupation within the Neighbourhood Plan area is Process, Plant and Machine Operatives (3.3%), significantly less than the local, regional and national average, reflecting the areas rural and non-industrial nature. Employment figures are also lower than the local, regional and national averages within the Neighbourhood Plan area for Elementary occupations as well as Sales and Customer Service occupations,

Summary of Future Baseline

The population of the Neighbourhood Plan area increased between the years 2001-2011 at approximately the same rate as the regional and national trends, however at a rate 4.3% less than for Canterbury District. 37% of residents are aged 60+ within the Neighbourhood Plan area, indicating the presence of an aging population.

Health and Wellbeing

Context Review

Key messages from the NPPF include:

- The social role of the planning system involves 'supporting vibrant and healthy communities'.
- A core planning principle is to 'take account of and support local strategies to improve health, social and cultural wellbeing for all'.
- The planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities'

- Promote the retention and development of local services and community facilities such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship.
- Set out the strategic policies to deliver the provision of health facilities.
- Access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities.

In relation to other key national messages in relation to health, Fair Society, Healthy Lives⁵¹ ('The Marmot Review') investigated health inequalities in England and the actions needed in order to tackle them. Subsequently, a supplementary report was prepared providing additional evidence relating to spatial planning and health on the basis that that there is: "overwhelming evidence that health and environmental inequalities are inexorably linked and that poor environments contribute significantly to poor health and health inequalities".

At the local level, the vision for the 'Kent Joint Health and Wellbeing Strategy 2014-2017^{'52} is 'to improve health and wellbeing outcomes, deliver a better coordinated quality care, improve the public's experience of integrated health and social care services, and ensure that the individual is involved and at the heart of everything we do'. The following outcomes aim to support the delivery of this vision, and are informed by the Joint Strategic Needs Assessment:

- Every child has the best start in life;
- Effective prevention of ill health by people taking greater responsibility for their health and wellbeing;
- The quality of life for people with long term conditions is enhanced and they have access to good quality care and support;
- People with mental health issues are supported to 'live well'; and
- People with dementia are assessed and treated earlier, and are supported to live well.

The increasing role that local level authorities are expected to play in providing health outcomes is demonstrated by recent government legislation. The Health and Social Care Act 2012 transferred responsibility for public health from the NHS to local government, giving local authorities a duty to improve the health of the people who live in their areas. This will require a more holistic approach to health across all local government functions.

⁵¹ The Marmot Review (2011) The Marmot Review: Implications for Spatial Planning [online] available to download from: <<u>http://www.apho.org.uk/resource/item.aspx?RID=106106</u>> last accessed [15/03/17]

⁵² Kent County Council (2017): 'Kent Joint Health and Wellbeing Strategy 2014-2017' [online] available to download via:
<<u>http://www.kpho.org.uk/joint-strategic-needs-assessment/about-the-jsna/what-makes-up-the-jsna-process</u>> last accessed [06/10/17]

Summary of Current Baseline

Health Indicators and Deprivation

Deprivation is a significant contributor to poor health and can have adverse effects on wellbeing, with elements related to housing quality, living environment, income and employment previously discussed. 77.8% of residents within the Neighbourhood Plan area consider themselves as having 'very good health' or good health', notably less than the total for Canterbury district (81.4%), the South East region (83.6%) and England as a whole (81.4%). Comparatively, 6.5% of residents within the Neighbourhood Plan area report either 'bad health' or 'very bad health', which is slightly higher than the total for Canterbury district (5.2%), the South East (4.4%) and England (5.4%).

Within the Neighbourhood Plan area, 21.8% of residents report that their daily activities are limited in some way, which is higher than the average for Canterbury District (18.1%), the South East (15.7%) and England (17.6%).

Summary of Future Baseline

An ageing population has the potential to place additional pressures on health services in the area.

Transportation

Context Review

European and UK transport policies and plans place emphasis on the modernisation and sustainability of the transport network. Specific objectives include reducing pollution and road congestion through improvements to public transport, walking and cycling networks and reducing the need to travel. National policy also focuses on the need for the transport network to support sustainable economic growth.

Kent County Council is currently developing its latest Local Transport Plan: *Local Transport Plan 4: Delivering Growth without Gridlock 2016-2031.*

Summary of Current Baseline

Rail Network

No railways stations are located within the Neighbourhood Plan area. The closest station is located 2km to the north-east in Bekesbourne, an approximate 5 minute drive or 30 minute walk from Bridge. This station provides links to Canterbury to the west and Dover to the east. Within Canterbury, there are two train stations; Canterbury West and Canterbury East. The latter is located closer to Bridge, approximately 10 minutes' drive or 18 minutes' bus journey away. Canterbury West provides linkages to the north-east (Margate) and south-west (Ashford). Canterbury East provides linkages to the north-west (Chatham) and the south-east (Dover). Both provide regular access to London, with high speed services from Canterbury West taking approximately 1 hour to reach St Pancras International.

Bus Network

In regards to the bus network the main service provider is Stagecoach⁵³. The two major services that pass through Bridge are service no. 17 (Canterbury – Folkestone) and 89 (Canterbury – Aylesham/Dover). The main bus stops are located by the White Horse Inn. The no. 17 runs every 30 minutes during mornings and hourly in the afternoon. The no. 89 provides two services an hour, one terminating in Aylesham and another with an extended route to Dover⁵⁴. Additionally, the Neighbourhood Plan area is adjacent to the Canterbury 'Park and Ride' site along New Dover Road. The timetable for the Park and Ride service is as follows⁵⁵:

• Monday-Saturday: Buses run every eight minutes from 7am to 7:30pm.

⁵³ Stagecoach (2017): [online] viewed at: https://www.stagecoachbus.com/ last accessed [18/04/17]

⁵⁴ Stagecoach (2017): '17 Bus Route and Timetable' and '89 Bus Route and Timetable', [online] available to download via: https://www.stagecoachbus.com/timetables last accessed [18/04/17]

⁵⁵ Canterbury City Council (2018): 'New Dover Road Park and Ride, Canterbury', [online] available to access via: <<u>https://www.canterbury.gov.uk/directory_record/1862/new_dover_road_park_and_ride_canterbury</u>> last accessed [22/02/18]

• Sunday: Buses run every fifteen minutes from 10am to 6pm.

Road Network and Congestion

A crossroad to the north of Bridge is the main point of access to the northern part of the Neighbourhood Plan area. This is linked to Bridge/Station Road to the west, Bekesbourne Road to the north and Town Hill to the east. 500m north of the crossroad is the A2, the main strategic route linking the parish with the M2 and Canterbury with Dover. The A2 can also be joined to the south of Bridge via Bridge Hill road, which is the only main route south. To the west and south-west, a series of small lanes provides access to the Downs and small hamlets. Furthermore, the A2050 (New Dover Road) connects residents of the Neighbourhood Plan area to the Canterbury City Centre.

Cycle and Footpath Network

Regional Cycle Route 17 crosses through the Neighbourhood Plan area, traversing west-east. To the west, the route takes in the Kent Downs AONB before reaching Folkestone or Dover. Route 17 links with Regional Cycle Route 16, adjacent to the Neighbourhood Plan area, travelling north-south between Canterbury and Whitfield⁵⁶.

The Elham Valley Way is a 36.21km route between Canterbury and Hythe using existing public rights of way which pass through the Neighbourhood Plan area. The North Downs Way trail passes adjacent to the Neighbourhood Plan area.

Availability of Cars and Vans

The proportion of households with no access to a car or van is 12.1%, which is significantly lower than the average for Canterbury District (22.9%), the South East (18.6%) and England (25.8%). The Neighbourhood Plan area has a slightly lower percentage of households with one car or van (39.6%), however it has a significantly higher percentage of two or more cars (48.3%) in comparison to Canterbury district (33.5%), the South East (39.7%) and England (32%).

Travel to Work

Based on the most recent census data, the most popular method of traveling to work in the Neighbourhood Plan area is via driving a car or van (46.3%). This is significantly higher than the average for Canterbury District (34.2%), the South East (41.3%) and England (36.9%). The second most popular methods of travelling to work within the Neighbourhood Plan area is on foot and passenger in a car or van (both 3.9%). As is typical for a rural area, travelling on foot is significantly lower than the average of Canterbury district (9.3%) and regional and national averages, while the proportion travelling by passenger in a car or van is in keeping with the local, regional and national average. A higher percentage of people within the Neighbourhood Plan area work mainly at/or from home (6.8%), in comparison to the averages for Canterbury District (3.7%), the South East (4.5%) and England (3.5%).

Summary of Future Baseline

Given the rural nature of the parish, and the lack of a rail station, car use is likely to continue to remain high in the Neighbourhood Plan area. There is likely to be an increase in the proportion of people working from home due to an increase in modern working patterns, including agile and flexible working.

⁵⁶ Sustrans (no date): 'National Cycle Network Route Map', [online] available to view via: <<u>http://www.sustrans.org.uk/ncn/map</u>> last accessed [15/03/17]

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