

BRACEBRIDGE HEATH NEIGHBOURHOOD PLAN 2020 - 2040

**The Report of the Independent Examiner to North Kesteven District Council on
the Bracebridge Heath Neighbourhood Plan**

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Independent Examiner
12th November 2021**

Summary

I was appointed by North Kesteven District Council, in agreement with the Bracebridge Heath Parish Council, in July 2021 to undertake the Independent Examination of the Bracebridge Heath Neighbourhood Plan.

The Examination has been undertaken by written representations. I visited the Neighbourhood Area on 27th September 2021 after resolving my initial enquiries of the Qualifying Body.

The Neighbourhood Plan proposes a local range of policies and seeks to bring forward positive and sustainable development in the Bracebridge Heath Neighbourhood Area. There is an evident focus on safeguarding the very distinctive, local character of the area whilst accommodating future change and growth.

The Plan has been underpinned by extensive community support and engagement. The social, environmental and economic aspects of the issues identified have been brought together into a coherent plan which adds appropriate local detail to sit alongside the Central Lincolnshire Local Plan.

Subject to a series of recommended modifications set out in this Report I have concluded that the Bracebridge Heath Neighbourhood Plan meets all the necessary legal requirements and should proceed to referendum.

I recommend that the referendum should be held within the Neighbourhood Area.

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Introduction

This report sets out the findings of the Independent Examination of the Bracebridge Heath Neighbourhood Plan 2020 - 2040. The Plan was submitted to North Kesteven District Council by Bracebridge Heath Parish Council in their capacity as the 'qualifying body' responsible for preparing the Neighbourhood Plan.

Neighbourhood Plans were introduced into the planning process by the Localism Act 2011. They aim to allow local communities to take responsibility for guiding development in their area. This approach was subsequently incorporated within the National Planning Policy Framework (NPPF) in 2012 and this continues to be the principal element of national planning policy. A new NPPF was published in July 2021 and it is against the content of this NPPF that the Plan is examined. The changes between the 2019 and 2021 revisions of the NPPF have not been significant in the examination of Policies in this Plan.

This report assesses whether the Bracebridge Heath Neighbourhood Plan is legally compliant and meets the 'basic conditions' that such plans are required to meet. It also considers the content of the Plan and, where necessary, recommends modifications to its policies and supporting text. This report also provides a recommendation as to whether the Bracebridge Heath Neighbourhood Plan should proceed to referendum. If this is the case and that referendum results in a positive outcome, the Bracebridge Heath Neighbourhood Plan would then be used in the process of determining planning applications within the Plan boundary as an integral part of the wider Development Plan.

The Role of the Independent Examiner

The Examiner's role is to ensure that any submitted Neighbourhood Plan meets the legislative and procedural requirements. I was appointed by North Kesteven District Council, in agreement with Bracebridge Heath Parish Council, to conduct the Examination of the Bracebridge Heath Neighbourhood Plan and to report my findings. I am independent of both North Kesteven District Council and Bracebridge Heath Parish Council. I do not have any interest in any land that may be affected by the Plan.

I possess the appropriate qualifications and experience to undertake this role. I have over 40 years' experience in various local authorities and third sector body as well as with the professional body for planners in the United Kingdom. I am a Chartered Town Planner and a panel member for the Neighbourhood Planning Independent Examiner Referral Service (NPIERS). I am a Member of the Royal Town Planning Institute.

In my role as Independent Examiner I am required to recommend one of the following outcomes of the Examination:

- the Bracebridge Heath Neighbourhood Plan is submitted to a referendum; or
- the Bracebridge Heath Neighbourhood Plan should proceed to referendum as modified (based on my recommendations); or
- the Bracebridge Heath Neighbourhood Plan does not proceed to referendum on the basis that it does not meet the necessary legal requirements.

As part of this process I must consider whether the submitted Plan meets the Basic Conditions as set out in paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990. If recommending that the Neighbourhood Plan should go forward to referendum, I must then consider whether or not the referendum area should extend beyond the Neighbourhood Area to which the Plan relates.

In examining the Plan, I am also required, under paragraph 8(1) of Schedule 4B to the Town and Country Planning Act 1990, to check whether:

- the policies relate to the development and use of land for a designated Neighbourhood Area in line with the requirements of Section 38A of the Planning and Compulsory Purchase Act 2004;
- the Neighbourhood Plan meets the requirements of Section 38B of the 2004 Act (the Plan must specify the period to which it has effect, must not include provision about development that is excluded development, and must not relate to more than one Neighbourhood Area);
- the Neighbourhood Plan has been prepared for an area that has been designated under Section 61G of the Localism Act and has been developed and submitted for examination by a qualifying body.

These are helpfully covered in the submitted Basic Conditions Statement and, subject to the contents of this Report, I can confirm that I am satisfied that each of the above points has been properly addressed and met.

In undertaking this Examination I have considered the following documents:

- Bracebridge Heath Neighbourhood Plan 2020 - 2040 as submitted
- Bracebridge Heath Neighbourhood Plan Basic Conditions Statement (October 2020)
- Bracebridge Heath Neighbourhood Plan Consultation Statement (February 2021)
- North Kesteven District Council Strategic Environmental Assessment & Habitats Regulations Assessment Screening Report January 2020
- Content at: <https://www.n-kesteven.gov.uk/residents/living-in-your-area/localism-your-community/neighbourhood-plans/bracebridge-heath-neighbourhood-plan/>
- Content at: <https://bracebridge-heath.parish.lincolnshire.gov.uk/homepage/11/neighbourhood-plan>
- Representations made to the Regulation 16 public consultation on the Bracebridge Heath Neighbourhood Plan
- The Central Lincolnshire Local Plan adopted in 2017
- National Planning Policy Framework (NPPF) (2021)
- Neighbourhood Planning Regulations (2012)
- Planning Practice Guidance (PPG) (March 2014 and subsequent updates)

I carried out an unaccompanied visit to the Neighbourhood Area on 27th September 2021. I looked at all the various sites and locations identified in the Plan document in their rural setting.

The legislation establishes that, as a general rule, Neighbourhood Plan examinations should be held without a public hearing, by written representations only. Having considered all the information before me, including the representations made to the submitted plan which I felt made their points with clarity, I was satisfied that the Bracebridge Heath Neighbourhood Plan could be examined without the need for a public hearing and I advised North Kesteven District Council accordingly. The Qualifying Body and the Local Planning Authority have helpfully responded to my enquiries so that I may have a thorough understanding of the facts and thinking behind the Plan, and the correspondence is being shown on North Kesteven District Council's Neighbourhood Planning website for the Bracebridge Heath Neighbourhood Plan.

Bracebridge Heath Neighbourhood Area

A map showing the boundary of the Bracebridge Heath Neighbourhood Area has been provided within the Neighbourhood Plan. Further to an application made by Bracebridge Heath Parish Council, North Kesteven District Council approved the designation of the Neighbourhood Area on 23rd October 2015. This satisfied the requirement in line with the purposes of preparing a Neighbourhood Plan under section 61G(1) of the Town and Country Planning Act 1990 (as amended).

Consultation

In accordance with the Neighbourhood Planning (General) Regulations 2012, the Qualifying Body has prepared a Consultation Statement to accompany the Plan.

The Planning Practice Guidance says:

“A qualifying body should be inclusive and open in the preparation of its Neighbourhood Plan [or Order] and ensure that the wider community:

- is kept fully informed of what is being proposed
- is able to make their views known throughout the process
- has opportunities to be actively involved in shaping the emerging Neighbourhood Plan [or Order]
- is made aware of how their views have informed the draft Neighbourhood Plan [or Order].” (Reference ID: 41-047-20140306)

The submitted Consultation Statement confirms that, since the plan-making was started in 2017, a wide variety of methods of public engagement has been used to good effect:

- Regular written reports and updates have been published in Heathcliff View and The Parish News, a particular purpose being to invite and encourage attendance and participation at the open, monthly meetings of the Neighbourhood Plan Sub-Committee.
- Minutes of the Sub-Committee and other Plan-related documentation were made available on the Bracebridge Heath Parish Council website.
- A Facebook group was established and, as a mark of its early success, the page was visited 146 times on the first day; polls and competitions at points during Plan progress provided a way of engaging with residents; this and other local Facebook groups were also used to advertise events.
- Consultation events were also advertised by the use of banners and posters which were displayed throughout the village, on the Parish Council notice boards, on railings and in local shops.
- Every third Saturday of the month, Sub-Committee members attended the coffee mornings at St John the Evangelist Church to engage with those present, with regularly updated display material.
- An innovative opening engagement with pupils of St John’s Primary Academy invited them to design a mascot for the Neighbourhood Plan thus providing the basis for younger villagers to think about their village and talk about it at home.
- In March 2018 a questionnaire survey was delivered to every household, and was also available on-line, with results independently analysed by Community Lincs; the survey included a section for parishioners aged 11 -18 years.
- Survey results were used as the basis for further engagement at local fetes and in particular at a Vision event at the Village Hall with over 150 people attending and invited to fill out postcards.
- In September 2019 Showcase events were held at the Village Hall and the Pavilion with Sub-Committee members available alongside a display of draft policies and heritage assets.

The Regulation 14 consultation was held from 22nd January to 8th March 2020. Digital copies of Neighbourhood Plan documents and comment form were made available on the Bracebridge Heath Parish Council website. Links to this website were provided on social media, in Heathcliff View and Parish News and on posters in local venues. Hard copies of the Plan were available in the centre of the village at Bracebridge Heath Community Library, the Church of St John the Evangelist, the café The Pantry, the Pavilion on the recreation ground, as well as at sheltered housing complexes Minster Court and Sheppard Court. Boxes were available in each location for completed forms or they could be posted to the Clerk to Council; comments could be entered online.

During the Regulation 14 consultation members of the Neighbourhood Plan sub-committee held open consultation events at the Library, Minster Court, Sheppard Court and St John the Evangelist Church. Statutory Consultees were consulted by email with access to the draft Neighbourhood Plan and the comment sheet. The many responses to the consultation are shown in the Consultation Statement with details of how these comments influenced the redrafting of the Plan prior to submission.

Accordingly, overall, I am satisfied that the consultation process accords with the requirements of the Regulations and the Practice Guidance and that, in having regard to national policy and guidance, the Basic Conditions have been met. In reaching my own conclusions about the specifics of the content of the Plan I will later note points of agreement or disagreement with Regulation 16 representations, just as the Qualifying Body has already done for earlier consultations. That does not imply or suggest that the consultation has been inadequate, merely that a test against the Basic Conditions is being applied.

Representations Received

Consultation on the submitted Plan, in accordance with Neighbourhood Planning Regulation 16, was undertaken by North Kesteven District Council from Monday 12th April to Monday 7th June 2021. I have been passed the representations – 15 in total – which were generated by the consultation and which are included alongside the submitted Plan on North Kesteven District Council’s Neighbourhood Planning website. I have not mentioned every representation individually within this Report but this is not because they have not been thoroughly read and considered in relation to my Examiner role, rather their detail may not add to the pressing of my related recommendations which must ensure that the Basic Conditions are met.

The Neighbourhood Plan

Bracebridge Heath Parish Council is to be congratulated on its extensive efforts to produce a Neighbourhood Plan for their area that will guide development activity over the period to 2040. I can see that a sustained effort has been put into developing a Plan around a vision for Bracebridge Heath:

“The village will:

- encourage exciting local cultural, educational and business opportunities, benefitting the community as a whole;
- identify and celebrate our proud village heritage by conserving our historical characteristics;
- protect existing, and promote the creation of new green open spaces. This will nurture a healthy environment and encourage the survival and growth of native flora and fauna within the designated area.”

The Plan document is well presented with a combination of text, images and Policies that are, subject to the specific points that I make below, well laid out and helpful for the reader. The Plan has been kept to a manageable length by not overextending the potential subject matter and the coverage of that.

It is an expectation of Neighbourhood Plans that they should address the issues that are identified through community consultation, set within the context of higher-level planning policies. There is no prescribed content and no requirement that the robustness of proposals should be tested to the extent prescribed for Local Plans. Where there has been a failure by the Qualifying Body to address an issue in the round, leading to an inadequate statement of policy, it is part of my role wherever possible to see that the community’s intent is sustained in an appropriately modified wording for the policy. It is evident that the community has made positive use of “direct power to develop a shared vision for their neighbourhood and shape

the development and growth of their local area” (Planning Practice Guidance Reference ID: 41-001-20140306).

Individually I can see that the Policies address legitimate matters for a Neighbourhood Plan as identified with the community. I will later look at the Policies in turn so as to ensure that the Basic Conditions are met, which include an obligation to be in general conformity with Local Plan strategic policies. Having considered all the evidence and representations submitted as part of the Examination I am satisfied that the submitted Plan has had regard to national planning policies and guidance in general terms. It works from a positive vision for the future of the Neighbourhood Area and promotes policies that are, subject to amendment to variable degrees, proportionate and sustainable. The Plan sets out the community’s priorities whilst seeking to identify and safeguard Bracebridge Heath’s distinctive features and character. The plan-making had to find ways to reconcile the external challenges that are perceived as likely to affect the area with the positive vision agreed with the community. All such difficult tasks were approached with transparency, with input as required and support from the North Kesteven District Council.

However, in the writing up of the work into the Plan document, it is sometimes the case that the phraseology is imprecise, not helpful, or it falls short in justifying aspects of the selected policy. This is not uncommon in a community-prepared planning document and something that can readily be addressed in most instances. Accordingly, I have been obliged to recommend modifications so as to ensure both clarity and meeting of the ‘Basic Conditions’. In particular, Plan policies as submitted may not meet the obligation to “provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency” (NPPF para 17). I bring this particular reference to the fore because it will be evident as I examine the policies individually and consider whether they meet or can meet the ‘Basic Conditions’.

Basic Conditions

The Independent Examiner is required to consider whether a Neighbourhood Plan meets the “Basic Conditions”, as set out in law following the Localism Act 2011; in December 2018 a fifth Basic Condition was added relating to the Conservation of Habitats and Species Regulations 2017. In order to meet the Basic Conditions, the Plan must:

- have regard to national policies and advice contained in guidance issued by the Secretary of State;
- contribute to the achievement of sustainable development;
- be in general conformity with the strategic policies of the Plan for the area;
- be compatible with European Union (EU) and European Convention on Human Rights (ECHR) obligations;
- not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017(d).

The submitted Basic Conditions Statement has very helpfully set out to address the issues in relation to these requirements in the same order as above and has tabulated the relationship between the policy content of the Plan and its higher tier equivalents. I note that the Local Plan is the Central Lincolnshire Local Plan adopted in 2017. As the Neighbourhood Plan does not allocate land for development and is supportive of Bracebridge Heath’s rural features, I am satisfied that the making of the Plan will not breach the Basic Condition relating to the Habitats and Species Regulations 2017.

I have examined and will below consider the Neighbourhood Plan against all of the Basic Conditions above, utilising the supporting material provided in the Basic Conditions Statement and other available evidence as appropriate.

The Plan in Detail

I will address the aspects of the Neighbourhood Plan content that are relevant to the Examination in the same sequence as the Plan. Recommendations are identified with a bold heading and italics, and I have brought them together as a list at the end of the Report.

Front cover

A Neighbourhood Plan must specify the period during which it is to have effect. I note that there is a prominent reference to the Plan period 2020 – 2040 on the front cover. The Qualifying Body has explained: “A 20-year period was adopted because it was felt that this would align with a likely timescale for the implementation of the SEQ” [new community]. The footnote reference to “Final Draft” can now be removed.

Foreword

Since much of the content here is later repeated or has served its consultation purpose, the Foreword can now be deleted.

Introduction

Sometimes the correct choice of words is important. The Neighbourhood Plan is required to include a map showing the designated “Neighbourhood Area” as distinct from “The Neighbourhood Plan Area”. The title and references to Map 1 therefore need correction.

Recommendation 1:

1.1 On the front cover and all later references amend the footnotes to remove “Final Draft”.

1.2 Delete the content of the Foreword.

1.3 Under the heading “Introduction”, amend the first sentence of paragraph 4 to replace “The parish area shown in Map 1 below was designated as the area covered by Bracebridge Heath parish” with ‘The area covered by Bracebridge Heath Parish (as shown on Map 1) was designated a Neighbourhood Area’; in the second sentence replace “Plan area” with ‘Area’.

1.4 Amend the title of Map 1 to delete “Plan”.

1. Why are we creating a Neighbourhood Plan?

No comments.

2. The Neighbourhood Plan Process

No comments.

3. A brief history of Bracebridge Heath

To avoid confusion, the reference to the “Council website” immediately under the section title should be amended to read the Parish Council and a hyperlink to the referenced document would also be helpful.

4. Bracebridge Heath Today

No comments.

5. Community Vision

No comments.

6. Community Objectives

I regard these as a record of the outcome of the consultation process.

Recommendation 2:

Immediately under the heading “3. A brief history of Bracebridge Heath”, replace “Council website” with ‘Parish Council website: <https://bracebridge-heath.parish.lincolnshire.gov.uk/downloads/file/25/bracebridge-heath-character-profile> ‘.

7. Housing Growth

Paragraph 13 of the NPPF notes that Neighbourhood Plans “should shape and direct development that is outside of [the] strategic policies. Local strategic policy includes for the provision for the South East Quadrant Sustainable Urban Extension and I note that the Qualifying Body has acknowledged the need to avoid conflict with that commitment.

Section 7 has proved controversial with some representations noting a discordance between the introductory text and the Policy that follows. Since it is the Policy itself to which planning applicants will have to show regard, arguably the preamble is of little consequence. However, the supporting text is supposed to provide evidence to justify the related Policy. Instead, significant parts of the preamble are not evidence but assertions. These therefore tend to undermine the authority of the Policy rather than support it.

Whilst I note that community views are provided, these are only based on community preferences, whereas planning policy must develop requirements based on hard evidence. It is noted that “It was clear from the consultation that parishioners do not want flats, terraced housing or three storey dwellings”, whereas, as the local authority has pointed out, the tabulation shows these as supported less but not ruled out completely. If, as is suggested in the text, all new dwellings were to be “single storey detached properties with three bedrooms and a larger garden” it is unlikely that any affordable housing would be feasible. Similarly, it is asserted that “A significant amount of on street parking in the newer residential developments makes it difficult to navigate and results in potential road safety issues” but these issues are not quantified. If significantly larger areas are expected for parked cars there is a direct conflict with Policy 2 which requires that new housing will “reflect existing local character through delivery of a layout that reflects the surrounding pattern of development including in terms of built form, plot sizes, bulk and scale.” Lowered housing densities will also affect scheme viability and the NPPF (para 122) requires that “Planning policies and decisions should support development that makes efficient use of land”. The Highway Authority points out that on-street parking can have a beneficial effect on traffic calming and, therefore, one aspect of safety.

Further, it is asserted that (Policy 2) “New developments within or immediately adjoining the village will typically be of one or two storeys to reflect the local character” but representations point out that the Character Profile document identifies that there are already 3 storey dwellings within the village. And the survey data doesn’t show nil support for 3 storey dwellings. The Policy might therefore more positively acknowledge in what limited circumstances 3 storeys can be appropriate, not least because permitted development rights now allow for additional storeys to be added to existing dwellings. However, the Qualifying Body has not further explored that approach.

The local authority and representations have pointed out that, since the Plan’s Regulation 14 consultation, a Broad Concept and Design Code has been adopted for the South East Quadrant Sustainable Urban Extension. This is a strategic initiative and the Neighbourhood Plan cannot be seen to conflict with the content of that document; that may require some amendments to Policy for clarity on this point.

The Qualifying Body has responded to these points: “Whilst we recognise that our consultations do not have the rigour to form a housing needs assessment, we would like to include a preference for house types within Bracebridge Heath. This is beneficial for existing and new residents of the village to obtain housing that meets their needs but it is also helps

to prevent properties remaining empty because they do not meet market need. We accept the suggested change from NKDC regarding paragraph 7.14 and are happy to amend accordingly.”

Looking at the wording of the related Policies in turn:

Policy 1: The use of the phrase “All new schemes including residential development” is, I imagine, used so as to include mixed use “schemes”, but ‘Residential developments’ would be sufficiently explanatory.

Policy 2: Since the Neighbourhood Plan Regulation 14 public consultation a Broad Concept Plan and Design Code has been adopted for the South East Quadrant Sustainable Urban Extension (SUE); the first part of the Policy will therefore need amendment to clarify that it does not relate to the South East Quadrant SUE. In that first element it is not clear what “internally” is suggesting since planning has a very limited influence on internal detailing; the Qualifying Body has responded “We accept ... that space standards are prescribed in other national planning policies and documents and this may not be appropriate here”.

In 2a it is difficult to comprehend what “feature walls in contracting [corrected as ‘contrasting’] colours/materials” might be suggesting, and why; the Qualifying Body has responded “The purpose behind this element was to ensure that new developments had similar characteristics to existing residential areas and to encourage some integrated design features throughout the parish. We are happy to include the wording suggested by the local authority at this point”; that wording is therefore the basis of my Recommendation.

The local authority has noted that element 3 is aligned with Local Plan Policy LP18.

In element 4 it is unclear what “In addition” at the beginning is suggesting and the Qualifying Body has explained that this is “in addition to parts 1 to 3...”. It is also difficult to comprehend what might be said to constitute “overdevelopment” and nothing is lost by its omission.

In element 5, since the Policy criteria are not measurable, it may be difficult to gauge when a criterion has “not been met”; the Qualifying Body has suggested revised words that provide the basis of my Recommendation.

The local authority has suggested adding, and the Qualifying Body has agreed, a sixth element: ‘6. Development proposals within the South East Quadrant Sustainable Urban Extension should be consistent with the adopted North Kesteven Broad Concept Plan and Design Code’; a source reference is needed for this document.

Policy 3: Whilst the Highway Authority doesn’t disagree with the scale of parking provision, they “consider these guidelines and not ‘standards’ because we assess each plot and site on an individual basis. These parking spaces do not need to be provided on plot, providing parking has otherwise been considered in good street design.” The local authority however considers that the requirement for 2 parking spaces per 1 bed dwelling is “unusually high and could undermine the viability of such developments”. The local authority is also concerned that the expectation for visitor parking is “unreasonable” given that the on-site parking spaces for 2 – 4 bedroom properties would normally be expected to be inclusive of spaces for guests. The local authority has added that 1 parking space per 4 flatted dwellings would be reasonable. Other representations note that Policy 3 is inconsistent with the Design Code for the South East Quadrant Sustainable Urban Extension.

The divergences from higher level policy are not justified without evidence. In particular it has not been explained how evidence from the 2011 Census and Office of National Statistics 2018 might justify the specific parking requirements that have been determined. As set out at paragraph 105 of the NPPF, “if setting local parking standards for residential and non-

residential development, policies should take into account: a) the accessibility of the development; b) type, mix and use of development; c) the availability of and opportunities for public transport; d) local car ownership levels". The Qualifying Body has responded: "Comments about parking provision are noted and reluctantly some alterations will be made." I don't believe that the local authority parking standards – which may change over time – need to be repeated in the Plan.

As I read element 3 it requires 3 car charging points per 4 bed dwelling (plus the visitor parking space) but no evidence is provided to indicate that such a density of provision per household is justified. The Qualifying Body has agreed that amendment is required.

The local authority has queried the application of element 4 and its accommodation within site layouts: "in a scheme of a number of houses with driveways where would shared visitor parking be located" to be useable? The local authority notes that the point about on-street parking is made in element 6 so it suggests that element 4 is best deleted; the Qualifying Body agreed.

In relation to element 6 the local authority has suggested that deliverability could be helped by rewording to: 'Proposals likely to result in excessive unplanned on-street parking will not be supported' which seems to accord with the approach taken by the Highway Authority, with their emphasis on road safety. The Qualifying Body agreed.

Policy 4: The local authority accepts that this Policy is consistent with the Local Plan subject to an amendment clarifying that it is a 'cycle space' that is required.

Recommendation 3:

Under the heading "Housing Growth":

3.1 In the second sentence of paragraph 7.4 replace "did not support" with 'were less supportive of'.

3.2 In paragraph 7.6 delete the second sentence since the matter is the subject of the following paragraph.

3.3 In paragraph 7.7 delete the last sentence since the evidence suggested is not provided.

3.4 In paragraph 7.9 omit the last two sentences since there is no supporting evidence.

3.5 In paragraph 7.10, second bullet point, omit the second sentence since it is already dated.

3.6 Delete paragraph 7.14 since it does not accord with the related table and duplicates a point made earlier.

3.7 Within Policy 1:

3.7.1 Delete "1."

3.7.2 Replace "All new schemes including residential development" with 'Residential development proposals'.

3.8 Within Policy 2:

3.8.1 Reword element 1 as: 'New developments within or immediately adjoining the village, but not within the South East Quadrant SUE, will typically be of one or two storeys.'

3.8.2 In element 2 delete “, both internally to each dwelling and externally” and replace 2a with ‘delivery of a layout that reflects or improves upon the surrounding pattern of development wherever possible, including:

- in terms of built form, plot sizes, bulk and scale;
- use of high-quality materials that reflect the development’s context;
- good use of brickwork detailing.’

3.8.3 In element 4 replace bullet points with letters a – e; amend the wording of a by replacing “In addition” with ‘In addition to parts 1 -3 of this Policy’; amend the wording of c by deleting “and not resulting in overdevelopment”.

3.8.4 Reword element 5 as: ‘Development proposals should demonstrate how the above criteria, and the Neighbourhood Character Profile, have informed the design’.

3.8.5 Add an element as follows: ‘6. Development proposals within the South East Quadrant Sustainable Urban Extension should be consistent with the adopted North Kesteven Broad Concept Plan and Design Code (www.n-kesteven.gov.uk/residents/planning-and-building/planning/planning-policy/supplementary-planning-guidance-lincoln-south-east-quadrant/)’.

3.9 Within Policy 3:

3.9.1 Reword element 2 as: ‘Adequate off-street car parking should be provided for the scale of the proposed scheme, well positioned in relation to the main building access point(s).’

3.9.2 Reword element 3 as: ‘Proposals should provide the infrastructure for charging electric plug-in vehicles.’

3.9.3 Delete element 4 and renumber subsequent elements accordingly.

3.9.4 Reword element 6 as: “Proposals likely to result in excessive unplanned on-street parking will not be supported.’

3.10 Amend Policy 4 element 2 to add ‘space’ between “cycle” and “per”.

As amended Policies 1 - 4 meet the Basic Conditions.

Affordable Housing

It would seem that this section should be numbered section 8.

There are dangers in providing “summaries” of matters set down through legislation, not least because the summary may be out of date, as is the case with paragraph 8.1 and the related Glossary entry. It is more appropriate to provide a document reference and hyperlink.

As the affordable housing requirement for developments is set outside of the Neighbourhood Plan, as noted, paragraphs 8.6 and 8.7 are not appropriate.

There is an evident disparity between the pre-ambule text to Policy 5 and the content of the Policy itself. It is questionable whether Policy 5 is a land-use policy (and whether its complexity is appropriate) since the Plan doesn’t actually have a related policy to allocate a site for new housing. Representations assert that decisions on who gets the new affordable housing (a term which covers a broad range of delivery types) should be based on need and income rather than current location. At the least, the Policy might be viewed as disproportionate given the (unquantified) level of affordable housing need likely to arise from

the population of Bracebridge Heath vs the significant scale of new housing (quantified) to be constructed, the majority of which will fall within a new community separated from Bracebridge Heath. The local authority has noted that “similar policies have been included in other made neighbourhood plans”. The local authority also suggests that this Policy is consistent with Local Plan Policy LP11 but I note the significant difference in level of prescription. The local authority has also queried the intention of the last bullet point; as worded it would seem to provide the same prioritisation for all people who work in North Kesteven District, but not in Bracebridge Heath itself?

The Qualifying Body responded that “The intention behind this policy was to enable existing residents the opportunity to move within the parish and obtain housing suitable for their needs. Advice was sought on the wording of this policy and its deliverability. The final wording was a result of several revisions and suggestions from NKDC to ensure it aligns to the prioritisation of affordable housing applied at the district level.” Accordingly, the only two amendments I will recommend are:

- i. Introductory words to make the link with the new construction;
- ii) To address the clarification suggested by the local authority.

Recommendation 4:

Under the heading “Affordable Housing”:

4.1 Amend the title to include ‘8.’

4.2 Amend paragraph 8.1 to read: ‘Affordable housing is essentially housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers). However, under planning regulations, affordable housing has a specific definition. The full definition can be found in the National Planning Policy Framework 2021 (NPPF www.gov.uk/government/publications/national-planning-policy-framework--2) Annex 2.’

4.3 Delete paragraphs 8.6 & 8.7.

4.4 Within Policy 5:

4.4.1 Delete “1.” and remove the unnecessary capitalisation of words.

4.4.2 Replace the first sentence with ‘At completion, priority for the new affordable housing will be given to people with a local connection whose needs are not met by the open market.’

4.4.3 Amend the second sentence to add, between “evidence” and “that”, ‘to the satisfaction of the local authority’.

4.4.4 Replace the last bullet point with: ‘Their current main place of permanent work is within the Parish or the neighbouring NKDC area and has been for a continuous period of twelve months.’

As amended Policy 5 meets the Basic Conditions.

9. Historic Character

NPPF paragraph 189 supports the conservation of heritage assets as an “irreplaceable resource”. The Appendix B list is admirably presented. It would appear that an unstated expectation of Policy 6 is that the heritage assets now identified are recognised as non-designated heritage (whereas the designated assets are already protected by national policy; in this respect paragraph 9.13 should not confuse about the mechanism for designation). The local authority has suggested the addition of ‘including those’ before “identified in Appendix B” so as to accommodate assets that might be identified in the future.

Within the second paragraph of the Policy, it seems contradictory that “great weight” should be afforded to conserving assets when the second sentence acknowledges that the weight will be proportionate to the significance of the asset. Here a representation notes that “Policy 6 does not separate the requirements in relation to designated and non-designated heritage assets, therefore the wording should be amended in order to ensure that the policy is compliant with national and local policy.” My Recommendations will address these points.

The Qualifying Body has commented: “We are happy to amend this policy in line with the comments made by NKDC” and they therefore will provide the basis for my Recommendations.

In relation to Policy 7, it is unclear, especially so without a pre-amble, why Policy 7 appears under “Historic Character” when the Policy wording suggests it is about economic value. The Qualifying Body has explained: “The St John’s Craft Workshops have been included at this point because of their connection to the former St John’s Hospital and the intrinsic historic value. These buildings are the last remaining buildings from the workshops and the farmyard buildings where patients used to work on a daily basis as part of their therapy. Therefore, this policy is about sustaining the use of these historic buildings.” My Recommendations will follow this guidance; as a result of recent changes to Use Classes many changes of use will not require a consent and this must be acknowledged.

Recommendation 5:

Under the sub-heading “9. Historic Character”:

5.1 Delete the second sentence of paragraph 9.13.

5.2 Within Policy 6:

5.2.1 Add a new element to Policy 6 as follows: ‘The non-designated heritage assets included in Appendix B are recognised for their historic significance, as detailed.’

5.2.2 Amend the existing element 1 to become element 2 as follows: “Development proposals likely to affect a heritage asset, including those identified in Appendix B, must be accompanied by a heritage statement.”

5.2.3 Amend the existing element 2 to become element 3 as follows: ‘Where a development proposal directly or indirectly affects a non-designated heritage asset, support for that proposal will depend on a balanced judgement of the scale of any harm or loss, and the significance of the asset.’

5.3 Within Policy 7:

5.3.1 Delete “1.”.

5.3.2 Reword Policy 7 as follows: ‘Where a planning consent is required, to be supported development proposals at the St John’s Craft Workshops must demonstrate their compatibility with sustaining the use of these historic buildings as a group and their character.’

As amended Policies 6 & 7 meet the Basic Conditions.

10. Commercial and Retail Uses

Recent Government changes to planning policy have sought to make commercial use classes significantly more flexible. In that context the local authority has noted: “Should a scheme require permission for change of use, this policy provides a reasonable framework for ensuring that adequate attempts have been made to find occupiers within the current use”. I accept that judgement.

It is unclear why it has been felt necessary to single out the access and parking needs of new facilities within the Bracebridge Heath Parish's South East Quadrant Sustainable Urban Extension; the Qualifying Body has accepted that this is inappropriate now that the Design Code for the SUE has been adopted.

The local authority has suggested the addition of 'any other future users or residents' at the end of element 1b to accommodate potential changes of use that would be possible under the present national use classes arrangements. The Qualifying Body has accepted the value of that amendment.

A representation queries why there is no policy to demonstrate how the retail offer can be improved. The Qualifying Body has responded: "The sub-committee looked at the possibility of improving the retail offer. It was decided, however, that without completely remodelling the centre of the village, that very few improvements could be made, particularly without losing the character of the centre of the village."

Recommendation 6:

Under the heading "10. Commercial and Retail Uses":

6.1 To paragraph 10.3 add: '(see Map 4)'.

6.2 Within paragraph 10.9 delete "(Use classifications for shops and businesses is shown in Appendix E)".

6.3 Within Policy 8:

6.3.1 From element 1 delete "as shown on Map 4".

6.3.2 To element 1(b) add 'and any other future users or residents'.

6.3.3 Delete element 2 and renumber element 3 accordingly.

6.3.4 Within element 3 add a comma between "suitable" and "landscaped".

As amended Policy 8 meets the Basic Conditions.

11. Employment

It is appropriate for a Neighbourhood Plan to consider local employment land uses within the NPPF context of sustainable development. However, to be useable Policy 9, which relates to a particular Estate, needs a map to locate the facility.

Looking at the wording of the Policies in turn:

Policy 9

The local authority has commented: "This policy provides some site-specific requirements for Sleaford Road Industrial Estate. The requirements are reasonable to ensure any developments at the estate do not result in conflicts with neighbouring uses or the character of the area. However, part 2 of the policy discusses the extension of the industrial estate, potentially into the South East Quadrant Sustainable Urban Extension. This is contrary to the recently adopted Broad Concept Plan for the SUE. As such, to avoid conflict, this part should be deleted. Generally, with the exception of the point above, this policy works alongside policy LP5 of the local plan." The Qualifying Body has accepted that the SEQ Policy is now more fully developed.

Policy 10

Helpfully the Policy wording is consistent with the equivalent Policy element for housing.

Policy 11

I note that the local authority is happy that Policy 11 works alongside Local Plan Policy LP5 and I accept that judgement. In bullet point two the wording, the County Council suggests, should be reworded to 'severe impact in terms of vehicle movements' to align with NPPF.

Recommendation 7:

Under the sub-heading "11. Employment":

7.1 Provide a Map 5 showing in outline the Sleaford Road Industrial Estate derived from the Policy Map of the Central Lincolnshire Local Plan; add to paragraph 11.4 '(see Map 5)'.

7.2 Within Policy 9:

7.2.1 In the title delete "(including any extensions into the South East Quadrant)".

7.2.2 Delete element 2 and renumber element 3 accordingly.

7.3 Within Policy 10 delete "1."

7.4 Within Policy 11:

7.4.1 Delete "1."

7.4.2 In bullet point two replace "not introduce adverse impacts" with 'not make a severe impact'.

As amended Policies 9, 10 & 11 meet the Basic Conditions.

12. Community Facilities

The local authority suggests that Policy 12 supports Local Plan Policy LP15 but I note a distinct difference between the Neighbourhood Plan and the Local Plan in what is said to amount to a community facility. In the Neighbourhood Plan it seems that everything that admits the public is a community facility whereas the Local Plan (and the NPPF) adopts the normal definition of facilities that "provide for the health and wellbeing, social, educational, spiritual, recreational, leisure and cultural needs of the community" (Central Lincolnshire Local Plan paragraph 4.9.2); by and large these are not commercial operations, although pubs are often regarded as community places. I question whether, for instance, it may be considered vital that a funeral director's is replaced like for like; in many instances permitted development will allow for changes, even to residential, that this Policy does not acknowledge. I therefore believe that the purely commercial activities need to be excluded from the ambit of this Policy. The Qualifying Body agreed.

A representation comments: "Where NHS commissioners can demonstrate that healthcare facilities are in need of reorganisation, which might include the disposal or development of a facility, there should be a presumption that such sites are suitable for other uses and should not be subject to restrictive policies." However, I note that presumption is not part of national planning policy. The Qualifying Body has commented: "With regard to the specific representation from the NHS, it is noted that a site may well be suitable for other uses. However, the policy is designed to restrict the uses of such land and buildings to facilities which have similar benefits for the community". The Policy in fact seeks to ensure that community facilities are retained for any continuing community benefit.

Within the Policy "community facilities" in element 1 become "valued community assets" in element 2; this type of confusion is unhelpful. Similarly, although the wording is different, the distinction being drawn between bullet points 2 & 3 in element 2 is not evident.

Recommendation 8:

Under the sub-heading "12. Community Facilities":

- 8.1 Delete references to “services” from the pre-amble paragraphs to Policy 12 ie
- in the first sentence of paragraph 12.2 delete “and services”;
 - in the first bullet point of paragraph 12.3 delete “services and” and in the second bullet point delete “key services and” twice;
 - in the opening sentence of paragraph 12.6 replace “services and” with ‘community’.

8.2 In paragraph 12.6, under the heading “Within the village centre” delete the first 12 entries so that the revised list commences with “Doctors’ Surgery”, and under the heading “Outside the village centre” delete the first 3 entries so that the revised list commences with “Day Nursery” and delete the last entry “Open green spaces”.

8.3 From paragraph 12.8 remove “(Appendix D)”.

8.4 Within Policy 12 element 2:

8.4.1 Replace “valued community asset” with ‘community facility’.

8.4.2 Replace “conclusively demonstrated” with ‘demonstrated to the satisfaction of the local planning authority’.

8.4.3 Delete bullet point 3.

As amended Policy 12 meets the Basic Conditions.

13. Green Infrastructure

The local authority suggests that Policy 13 is “consistent with” Local Plan Policy LP20. However, in reality the neighbourhood policy seems to say nothing more than the Local Plan, The NPPF (para 16(f)) says that “unnecessary duplication of policies that apply to a particular area” should be avoided. The Qualifying Body has responded: “Community consultations have consistently shown that maintaining the village’s green spaces and wherever possible improving and increasing these green spaces has been one of the most important aspects of the Neighbourhood Plan. The preamble for this particular policy provides additional detail about the types of green infrastructure that are important to residents of this village including woodland paths, rural views, easy reach of a city with a village feel. The sub-committee feels that this is an important policy and it should be retained.” However, it is evident that it is Policy 16 that relates specifically to the Neighbourhood Area and also relates to green infrastructure; there is no need for two Policies to make the same point. I will address any amendments to Policy 16 below.

Recommendation 9:

Delete Policy 13 but retain the pre-amble paragraphs 13.1 – 13.6; renumber subsequent Policies accordingly.

13a. Maintaining Separation and 13b. Viking Way and the Lincoln Edge Green Wedges

The principle of separation is established in the Local Plan (Policy LP22) and the planning for the South East Quadrant. The local authority comments about this section that “It would be beneficial if a reference to the adopted Broad Concept Plan and Design Code for the South East Quadrant could be made to show consistency.” To my mind Policies 14 & 15 need to be considered together. The interpretation of Map 5 seems to depend on the noting of large areas of white space and a text insertion about the South-East Quadrant; it lacks clarity. On the other hand, Map 6 shows its green areas very clearly, albeit the local authority has pointed out the need for correction now that the Broad Concept Plan and Design Code for the South East Quadrant has been published. Policy 15 seems to say nothing more than the Local Plan about Green Wedges and the protection afforded to them (in fact it may confuse where it implies in elements 2 - 4 that development proposals may be acceptable). Policy 14

on the other hand, notes the new green areas that will be distinguishing Bracebridge Heath from the new village. Accordingly, I feel that clarity of Policy would benefit from a merger of Policies 14 & 15. The Qualifying Body has responded: "Policies 14 and 15 have been written separately so as to emphasise the importance of maintaining separation between Bracebridge Heath and surrounding villages which will be developed as part of the SEQ including the newly proposed 'Canwick Heath' On Policy 15 points 2-4, these proposals relate to the Lincoln Edge and the Viking Way only between Coningsby Crescent to the north and Vauxhall Road to the south. These specific points have been included to prevent any development that would make Bracebridge Heath more visible from the valley below The changes to Policy 14 suggested by NKDC are acceptable and we would be happy to adopt these." There is no need for the Neighbourhood Plan to repeat the strategic planning restrictions already within the Local Plan or the adopted Broad Concept Plan and Design Code for the South East Quadrant. Therefore, I believe the potential for confusion through duplication would be significantly reduced if Policies 14 & 15 (as now renumbered) were merged and simplified.

The local authority suggests that "the wording of part one [of Policy 14] is slightly inconsistent with the Broad Concept Plan but this can be amended very simply to achieve the same outcome as desired by the Parish Council: 'New development within the South East Quadrant beyond Bracebridge Heath Parish must be clearly separated from proposed development within the South east Quadrant that lies within the Neighbourhood [Area] in order to maintain the separate identity of Bracebridge Heath. This will be delivered in accordance with the strategic open space areas identified within the Broad Concept Plan and Design Codes.' The Qualifying Body has suggested a revision to elements 2 – 4 of Policy 15 which I have used as a basis for my Recommendation.

Recommendation 10:

10.1 Under the heading "13a Maintaining Separation" delete Map 5 (a new Map 5 was created earlier), paragraph 13.13 (and renumber subsequent paragraphs accordingly) and Policy 14 (and renumber subsequent Policies accordingly).

10.2 Remove heading 13b (and renumber subsequent sections accordingly); retitle Map 6 and Policy 15 as 'Areas of Separation'; reference the source of the data for the Map.

10.3 In Map 6 replace the reference in the key to the Canwick Heath draft Open Space Plan with a reference to the South East Quadrant Broad Concept Plan and Design Code (2020) and amend the extent of the related green areas on the Map to reflect the plan at Figure 1.1. of the Concept Plan

10.4 Within Policy 15 (now retitled and renumbered as Policy 13):

10.4.1 Add a new element 1 as follows: 'New development within the South East Quadrant beyond Bracebridge Heath Parish must be clearly separated from proposed development within the South east Quadrant that lies within the Neighbourhood Plan area in order to maintain the separate identity of Bracebridge Heath. This will be delivered in accordance with the strategic open space areas identified within the Broad Concept Plan and Design Code.'

10.4.2 Add back element 2 of the original Policy 14.

10.4.3 Amend element 1 of Policy 15 to read: 'Development proposals, including changes of use, within the Lincoln Edge Green Wedge must demonstrate either that they are not contrary to or detrimental to the functions and aims of Green Wedges, or that it is essential that they are located within the Green Wedge and the benefits override the potential impact on the Green Wedge.'

10.4.4 Follow the above with elements 2 – 4 of Policy 15 reduced and reworded as follows:

‘4. In relation to the Green Wedge at the western edge of the village any development proposal in this location should:

- not increase the visibility of the village from the Witham Valley floor to the west; and*
- avoid urbanisation of the Viking Way Route and any encroachment on this green space.*

5. Development proposals within close proximity to the Green Wedge should retain and where possible enhance connectivity to the Viking Way.’

As renumbered and amended Policy 13 meets the Basic Conditions.

13c. Open spaces, sports facilities, and recreation facilities

This Policy supports Local Plan Policy LP 24. Map 7 is a helpful and striking illustration; however, there is a confusing overlap with the map for Policy 18 with only one of the Local Green Spaces also showing as an open space; the Qualifying Body suggests that their aim was to separate the two, but I feel it would be more appropriate to show all the recognised open spaces on Map 7. The Local Green Spaces will be considered below.

Certain aspects of the wording of Policy 16 lack clarity. In element 1 of the Policy, it is not possible to say that applications “will be refused” because a number of other factors than those listed are likely to need to be considered. In element 2 of the Policy, it is unclear what these terms mean in the context: “wherever suitable”, “robust”, “accessible to all users”; also, the relevance of “a well-considered plan to reduce the ongoing cost for management and maintenance of the open space” to land use decisions is not established. Some rewording for clarity is therefore required, informed by the responses received from the Qualifying Body.

Recommendation 11:

Under the sub-heading “13c. Open spaces, sports facilities, and recreation Facilities”:

11.1 Renumber the section as 13b.

11.2 Amend Map 7 by adding in the Local Green Space titled “The Hillies”.

11.3 Within Policy 16 (now renumbered as Policy 14):

11.3.1 Reword the second sentence of element 1 as:

‘Recreation and playing field space will be safeguarded from development unless it can be demonstrated that.’

11.3.2 Reword the second sentence of element 2 as:

‘Open spaces should be of high quality and design with appropriate attention to:

- potential for adaptability;*
- accessibility for all users;*
- opportunities for formal and/or informal play and exercise;*
- incorporation of natural features such as trees and other vegetation to create opportunities for biodiversity net gains;*
- linking into the wider green infrastructure network;*
- creating an attractive natural landscape.’*

As renumbered and reworded Policy 14 meets the Basic Conditions.

13d Locally important views

The Qualifying Body agreed with my view that separating the Local Green Space section from the Open Spaces section was unhelpful; I will therefore examine section 14 before returning to section 13d.

14. Designating Local Green Space

Paragraph 14.4 says “Bracebridge Heath Neighbourhood Plan has identified local green space sites to ensure that the vision of parishioners and the Central Lincolnshire Local Plan keep Bracebridge Heath as a separate community from adjacent villages, is adhered to, including the proposed Canwick Heath and Lincoln”. However, this is not part of the basis on which Local Green Spaces can be designated. As noted in paragraph 14.2, designation is entirely dependent on identified spaces meeting the NPPF (and Practice Guidance) criteria. From careful reading of the descriptions of the identified four spaces, and viewing them on the ground, I can just about interpret why the spaces were considered to meet the NPPF criteria, but a straight appraisal of the spaces against the criteria would have been appropriate. Considering the spaces in turn:

1. Small meadow between 27 London Road and Whitehall Farm Cottages

At my request the Qualifying Body has clarified: “Local space 1 was included as defined on the map because it represents a visual separation between Lincoln and Bracebridge Heath and will also help to define a visual boundary from the new development at ‘Canwick Heath’ within the South East Quadrant. Currently the area is planted as a wildflower meadow and whilst may not be easily definable on the ground, the aerial views of this parcel of green space show that it is easily distinguishable from the rest of the field which adjoins it. We acknowledge that the visual separation and the environmental benefits discussed in the Plan are not exclusive to this parcel of land and we also acknowledge that Local Green Space 1 does form part of the green wedge as defined in the Lincoln SEQ Broad Concept Plan and Design Code. By protecting this particular piece of green space the Neighbourhood Plan will resist any development which will result in a reduction of this separation including but not limited to residential, business uses, car parking or developed access to the pipeline green corridor of the South East Quadrant.” As the land in question falls within a Local Plan Strategic Site, I do not consider that the “particular local significance” (NPPF paragraph 102) has been evidenced or established to the degree required to impose on the strategic initiative. In practice there is already a Local Plan Policy commitment to retain the area as open space within a larger belt of open space, and it is evident that the space demarcated for the Local Green Space is more appropriately considered in that context.

2. The Hillies

This space is already protected as part of a Green Wedge and it is therefore necessary to identify what additional protection Local Green Space designation might provide. The Qualifying Body has responded: “Local space 2 has locally and historically been known as ‘The Hillies’ for over 70 years. The area shown on the map has been chosen because there is a natural contour line which runs north to south along the cliff edge. Beyond the area identified on the map, the land falls away sharply and whilst there is still visual amenity including the views across the City of Lincoln, the amenity value is reduced beyond the cliff edge.” I accept that the space demarcated is established as having a “particular local significance” (NPPF paragraph 102) by virtue of its historical and local landscape importance.

3. Cricket Pitch

The owners of space 3 have objected to the proposed Local Green Space designation on the grounds that the designation “might prove restrictive to future use on the site” However, that is not a matter that is of relevance; a Local Green Space can be designated if it meets the NPPF (and Guidance) criteria. It is evident that the Space is (as in NPPF paragraph 102) “in reasonably close proximity to the community it serves” and “local in character and is not

an extensive tract of land”, however it may be more questionable whether the Space is “demonstrably special to a local community and holds a particular local significance”. The Qualifying Body has explained: “Space 3 .. has been the village’s cricket ground since 1948, and previously in the 1920’s and 30’s (<https://cricketlincs.lincoln.ac.uk/clubs/bracebridge-heath/>). The teams are in the local league and have an active junior section, running additional coaching sessions throughout the summer. The majority of those involved are local people and it is well supported by parishioners. The area around the pitch is used by the community for walking and family picnics. This space contributes to the health and wellbeing of residents in the village by providing an aesthetically pleasing and pleasant area to relax in. The cricket pavilion on the grounds is also used as a hired space by other village organisations and therefore has a community focus. Bracebridge Heath has a deficit of playing field areas and this is the only space available on which cricket can be played.” I therefore can conclude that Space 3 meets the NPPF criteria for Local Green Space designation.

4. Lancia Green

Although Space 4 is unremarkable I accept that it is of particular significance locally “at the entrance to the village which gives the visual impression that the village is a lot smaller than it is. It is valuable for wildlife as it has a long stand of mature mixed deciduous trees. Lancia Green is also used by the local community as a focal point as the village Christmas tree is positioned here.”

The NPPF (paragraph 103) says that “Policies for managing development within a Local Green Space should be consistent with those for Green Belts.” Therefore, Policy 18 (as renumbered) cannot say anything that departs from that expectation.

Recommendation 12:

Under the heading “14. Designating Local Green Space”:

12.1 Within the heading renumber the section as 13c, reposition it before section 13d, and amend the paragraph numbers accordingly.

12.2 In paragraph 14.1 add to the “NPPF” reference ‘paragraphs 101 – 103’.

12.3 In paragraph 14.3 delete “(see attached map)”.

12.4 In paragraph 14.4:

12.4.1 Replace “to ensure that the vision of parishioners and the Central Lincolnshire Local Plan keep Bracebridge Heath as a separate community from adjacent villages, is adhered to, including the proposed Canwick Heath and Lincoln.” with ‘as follows:’.

12.4.2 Delete the entry for Space 1 and renumber the other Spaces accordingly.

12.4.3 To the entry for Space 3 add: ‘This space has been the village’s cricket ground since 1948, and previously in the 1920’s and 30’s (<https://cricketlincs.lincoln.ac.uk/clubs/bracebridge-heath/>).’

12.5 Replace Map 9 (now renumbered Map 8) with 3 maps individually identifying the designated Local Green Spaces (renumbered as 1 – 3 cross-referencing to the Policy) at a scale which allows the boundaries of the spaces to be identified with absolute clarity.

12.6 Rewrite Policy 18 (now renumbered as Policy 15) as: ‘The spaces as shown as Map 8 are designated as Local Green Spaces:

- 1. The Hillies*
- 2. Cricket Pitch*
- 3. Lancia Green.*

The management of development within these areas will be consistent with that for development within Green Belts as set out in national policy.'

As renumbered and amended Policy 15 meets the Basic Conditions.

13d Locally important views

I will now return to considering this section. Map 8 is problematic; most of the view vectors extend across the Neighbourhood Area boundary, in fact view 6 does not appear to be within the Area at all and viewpoint 1 is outside the Area. It is a requirement that Neighbourhood Plans should not relate to more than one Neighbourhood Area. Therefore, the vectors can only relate to land within the designated Neighbourhood Area. The Qualifying Body has commented: "Regarding Policy 17, the intention behind this policy was to afford some protection to the locally important views from development proposals within the parish of Bracebridge Heath. We understand that some of the views identified (and the length of the vectors shown on the map) make this appear as if we wish to apply the policy beyond the boundary of the parish. This is not the case." Accordingly, some amendments will be required.

Representations express a concern that no justification or selection criteria are provided for terming the identified views as "important". If these views may be considered illustrative of the rural character of the Parish, then they can only be "protected" within those terms. Development cannot be prevented but suitable mitigation should be expected. It seems unlikely that a formal "landscape assessment" would be justified in all instances since the landscape is variable and the scale of developments will vary. Indeed, the Qualifying Body has noted that "a formal landscape assessment has already been carried out by NKDC which details the character of the cliff edge". Recommendations will therefore address these issues.

Recommendation 13:

Under the heading "13d Locally important views":

13.1 Renumber the paragraph numbers as appropriate.

13.2 In paragraph 13.21 replace "protected" with 'respected'.

13.3 Rewrite paragraph 13.23 as: 'All development proposals must demonstrate regard for the Landscape Assessment carried out by NKDC (www.n-kesteven.gov.uk/residents/planning-andbuilding/planning/planning-applications/north-kesteven-landscape-character-assessment/) The important views identified here must be regarded as sensitive to development that would obstruct or detract from their value. The indicative positions of these views are shown on Map 9.'

13.4 Amend Map 8 to renumber it as Map 9 and remove any view vector or part of a view vector that is beyond the boundary of the Neighbourhood Area; amend the numbering and key to the Map accordingly.

13.5 Within Policy 17 (now renumbered as Policy 16):

13.5.1 In the opening sentence replace "views are designated" with '(illustrated in Map 9) are regarded'.

13.5.2 Amend the view listing to accord with the revised Map 9.

13.5.3 Rewrite the last sentence as:

'Development proposals that will impact on a locally important view should be accompanied by a proportionate assessment of how the significance of the view has

been taken into account and the steps necessary to address and minimise any adverse impact.’

As renumbered and amended Policy 16 meets the Basic Conditions.

15. Transport and Public Rights of Way

As the local authority has noted, the topic of Policy 19 is consistent with Local Plan Policy LP13. However, the Policy wording is unclear as to what “evidence” is appropriate to “demonstrate the suitability of this provision in relation to the existing network and local facilities”. The Qualifying Body has responded: “It would be expected that the developer would be able to demonstrate that the footpaths and cycle-ways within a new development can link up with existing provision and any future developments where appropriate. This would normally be shown on site layout plans where we are asking for it to specifically demonstrate the connectivity with the wider network and we would be happy for this to be clarified in this policy.”

The second element of the Policy is expressed negatively when the NPPF asks for a positive approach (Paragraph 16(b)). Also Map 10 needs an authoritative data source.

Recommendation 14:

14.1 Within the heading “15. Transport and Public Rights of Way” amend the section number to 14 and amend the paragraph numbers accordingly.

14.2 Within Policy 19 (now renumbered as Policy 17)” reword the second sentence of element 1 as: ‘Connectivity with the wider network should be achieved wherever possible.’

14.3 To Map 10 add a source reference.

As renumbered and amended Policy 17 meets the Basic Conditions.

16. Implementation and Monitoring

Whilst it is useful to have a commitment to monitoring, in paragraph 16.4 it is suggested that “monitoring” will “ensure” the delivery of the Local Plan housing commitment. However, the Parish Council cannot “ensure” that delivery. The Qualifying Body agreed a change of wording is required.

Recommendation 15:

15.1 Within the heading “16. Implementation and Monitoring” amend the section number to 15 and amend the paragraph numbers accordingly.

15.2 In paragraph 16.4 replace “in the neighbourhood area to ensure that the ambitions of policies LP2 and LP4 of the Central Lincolnshire Local Plan are achieved” with ‘in the Neighbourhood Area as set down in Policies LP2 and LP4 of the Central Lincolnshire Local Plan’.

Appendices and Glossary

I noted to the Qualifying Body that there are two Appendices D; the one relating to “Use classes definitions from September 1st 2020” is inappropriate, partly because it provides more detail than is necessary to understand the Plan content and partly because it is a snapshot of national planning policy that should be provided via the source reference where updates will be available as they occur. It was therefore agreed that this should be deleted. Other than that, I have no comments on the Appendices beyond what I have noted above.

I have not thoroughly checked the Glossary but, on the basis that the “Affordable Housing” entry is wrong, the contents should be checked against the 2021 NPPF Annex 2.

Recommendation 16:

16.1 Delete the Appendix D headed “Use classes definitions from September 1st 2020”; amend the Contents page accordingly.

16.2 Check the content of the Glossary against the definitions provided in the NPPF2021 Annex 2.

Other matters raised in Representations

A representation comments that the Plan “lacks ambition to solve current and emerging issues necessary to facilitate our community’s existing and future needs”. The Qualifying Body responded: “With regard to lacking ambition, the sub-committee has endeavoured to focus on two important aspects of the plan; maintaining separation from other settlements and protection and improvement of green spaces within the village. Whilst there are a number of other policies within the plan, these aspects came out strongly in our consultations.

Through the development of this plan, the sub-committee has successfully engaged with the community. The plan before you represents the coverage which we have been told by the community is sought after, but within the limitations of the wider planning framework and rules. It is accepted that this may not satisfy every member of the community but it is felt that the plan addresses many of the key local challenges identified by the community and takes an ambitious approach to delivering a positive framework for addressing these challenges.”

I am satisfied that that the Plan Policies address legitimate matters for a Neighbourhood Plan as identified with the community. The Plan sets out the community’s priorities whilst seeking to identify and safeguard Bracebridge Heath’s distinctive features and character. The Plan can rely on the Local Plan to address strategic issues and the two Plans will work together. In that context I have not identified evidence to suggest that the Neighbourhood Plan lacks ambition.

European Union (EU) and European Convention on Human Rights (ECHR) Obligations

A further Basic Condition, which the Bracebridge Heath Neighbourhood Plan must meet, is compatibility with European Union (EU) and European Convention on Human Rights (ECHR) obligations.

There is no legal requirement for a Neighbourhood Plan to have a sustainability appraisal. The Strategic Environmental Assessment and Habitats Regulations Assessment Screening carried out by North Kesteven District Council for the Bracebridge Heath Neighbourhood Plan (January 2020) considered whether or not the content of the Plan required a Strategic Environmental Assessment (SEA) in accordance with the European Directive 2001/42/EC and associated Environmental Assessment of Plan and Programmes Regulations 2004. In accordance with Regulation 9 of the SEA Regulations 2004, North Kesteven District Council determined: “North Kesteven District Council consider it is unlikely that there will be any significant environmental effects arising from the BHNP and thus the BHNP can be screened out for further SEA [and] there are unlikely to be any significant effects on a designated Natura 2000 site arising from the implementation of the BHNP, and therefore further HRA assessment under the Habitats Regulations can be screened out. The BHNP does not allocate any land or sites for development, but provides guidance to be used to determine applications should they come forward. The policies in the BHNP generally accord with the

adopted Central Lincolnshire Local Plan, the potential environmental effects of which were duly assessed through the plan-making process through SA/SEA and HRA assessment". In making their determination, North Kesteven District Council had regard to Schedule 1 of the Regulations and carried out consultation with the relevant public bodies which concurred with the conclusion of the Assessment. Particularly in the absence of any adverse comments from the statutory body or the Local Planning Authority (either at the Screening or the Regulation 16 Consultation) I can confirm that the Screening undertaken was appropriate and proportionate, and that the Plan has sustainability at its heart.

In regard to the European Convention on Human Rights, the Basic Conditions Statement that accompanies the Neighbourhood Plan states: "The Neighbourhood Plan has regard to and is compatible with the fundamental rights and freedoms guaranteed under the European Convention on Human Rights. Whilst an Equality Impact Assessment Report has not explicitly been prepared, ... great care has been taken throughout the preparation and drafting of this Plan to ensure that the views of the whole community were embraced to avoid any unintentional negative impacts on particular groups. The population profile has revealed that there is not a significant number of people who do not speak English as a first language, and it has not been necessary to produce consultation material in other languages." I therefore confirm that the Bracebridge Heath Neighbourhood Plan has regard to fundamental rights and freedoms guaranteed under the ECHR and complies with the Human Rights Act 1998. No evidence has been put forward to demonstrate that this is not the case.

Taking all of the above into account, I am satisfied that the Bracebridge Heath Neighbourhood Plan is compatible with EU obligations and that it does not breach, nor is in any way incompatible with, the ECHR.

Conclusions

This Independent Examiner's Report recommends a range of modifications to the Policies, as well as some of the supporting content, in the Plan. Modifications have been recommended to effect corrections, to ensure clarity and in order to ensure that the Basic Conditions are met. Whilst I have proposed a significant number of modifications, the Plan itself remains fundamentally unchanged in the role and direction set for it by the Qualifying Body.

I therefore conclude that, subject to the modifications recommended, the Bracebridge Heath Neighbourhood Plan:

- has regard to national policies and advice contained in guidance issued by the Secretary of State;
- contributes to the achievement of sustainable development;
- is in general conformity with the strategic policies of the Plan for the area;
- is compatible with European Union (EU) and European Convention on Human Rights (ECHR) obligations;
- does not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017(d).

On that basis I *recommend* to North Kesteven District Council that, subject to the incorporation of modifications set out as recommendations in this report, it is appropriate for the Bracebridge Heath Neighbourhood Plan to proceed to referendum.

Referendum Area

As noted earlier, part of my Examiner role is to consider whether the referendum area should be extended beyond the Plan area. I consider the Neighbourhood Area to be appropriate and no evidence has been submitted to suggest that this is not the case. I therefore ***recommend*** that the Plan should proceed to referendum based on the Neighbourhood Area as approved by North Kesteven District Council on 23rd October 2015.

Recommendations: (this is a listing of the recommendations exactly as they are included in the Report)

Rec	Text	Reason
1	<p>1.1 On the front cover and all later references amend the footnotes to remove “Final Draft”.</p> <p>1.2 Delete the content of the Foreword.</p> <p>1.3 Under the heading “Introduction”, amend the first sentence of paragraph 4 to replace “The parish area shown in Map 1 below was designated as the area covered by Bracebridge Heath parish” with ‘The area covered by Bracebridge Heath Parish (as shown on Map 1) was designated a Neighbourhood Area’; in the second sentence replace “Plan area” with ‘Area’.</p> <p>1.4 Amend the title of Map 1 to delete “Plan”.</p>	For clarity and accuracy
2	<p>Immediately under the heading “3. A brief history of Bracebridge Heath”, replace “Council website” with ‘Parish Council website: https://bracebridge-heath.parish.lincolnshire.gov.uk/downloads/file/25/bracebridge-heath-character-profile ‘.</p>	For clarity and accuracy
3	<p>Under the heading “Housing Growth”:</p> <p>3.1 In the second sentence of paragraph 7.4 replace “did not support” with ‘were less supportive of’.</p> <p>3.2 In paragraph 7.6 delete the second sentence since the matter is the subject of the following paragraph.</p> <p>3.3 In paragraph 7.7 delete the last sentence since the evidence suggested is not provided.</p> <p>3.4 In paragraph 7.9 omit the last two sentences since there is no supporting evidence.</p> <p>3.5 In paragraph 7.10, second bullet point, omit the second sentence since it is already dated.</p> <p>3.6 Delete paragraph 7.14 since it does not accord with the related table and duplicates a point made earlier.</p> <p>3.7 Within Policy 1:</p> <p style="padding-left: 40px;">3.7.1 Delete “1.”.</p> <p style="padding-left: 40px;">3.7.2 Replace “All new schemes including residential development” with ‘Residential development proposals’.</p> <p>3.8 Within Policy 2:</p> <p style="padding-left: 40px;">3.8.1 Reword element 1 as: ‘New developments within or immediately adjoining the village, but not within the South East Quadrant SUE, will typically be of one or two storeys.’</p>	For clarity and accuracy and to meet Basic Conditions 1 & 3

	<p>3.8.2 In element 2 delete “, both internally to each dwelling and externally” and replace 2a with ‘delivery of a layout that reflects or improves upon the surrounding pattern of development wherever possible, including:</p> <ul style="list-style-type: none"> • in terms of built form, plot sizes, bulk and scale: • use of high-quality materials that reflect the development’s context; • good use of brickwork detailing.’ <p>3.8.3 In element 4 replace bullet points with letters a – e; amend the wording of a by replacing “In addition” with ‘In addition to parts 1 -3 of this Policy’; amend the wording of c by deleting “and not resulting in overdevelopment”.</p> <p>3.8.4 Reword element 5 as: ‘Development proposals should demonstrate how the above criteria, and the Neighbourhood Character Profile, have informed the design’.</p> <p>3.8.5 Add an element as follows: ‘6. Development proposals within the South East Quadrant Sustainable Urban Extension should be consistent with the adopted North Kesteven Broad Concept Plan and Design Code (www.n-kesteven.gov.uk/residents/planning-and-building/planning/planning-policy/supplementary-planning-guidance-lincoln-south-east-quadrant/)’.</p> <p>3.9 Within Policy 3:</p> <p>3.9.1 Reword element 2 as: ‘Adequate off-street car parking should be provided for the scale of the proposed scheme, well positioned in relation to the main building access point(s).’</p> <p>3.9.2 Reword element 3 as: ‘Proposals should provide the infrastructure for charging electric plug-in vehicles.’</p> <p>3.9.3 Delete element 4 and renumber subsequent elements accordingly.</p> <p>3.9.4 Reword element 6 as: “Proposals likely to result in excessive unplanned on-street parking will not be supported.’</p> <p>3.10 Amend Policy 4 element 2 to add ‘space’ between “cycle” and “per”.</p>	
4	<p>Under the heading “Affordable Housing”:</p> <p>4.1 Amend the title to include ‘8.’.</p> <p>4.2 Amend paragraph 8.1 to read: ‘Affordable housing is essentially housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers). However, under planning regulations, affordable housing has a specific definition. The full definition can be found in the National Planning Policy Framework 2021 (NPPF www.gov.uk/government/publications/national-planning-policy-framework--2) Annex 2.’</p>	For clarity and accuracy and to meet Basic Condition 1

	<p>4.3 Delete paragraphs 8.6 & 8.7.</p> <p>4.4 Within Policy 5:</p> <p>4.4.1 Delete “1.” and remove the unnecessary capitalisation of words.</p> <p>4.4.2 Replace the first sentence with ‘At completion, priority for the new affordable housing will be given to people with a local connection whose needs are not met by the open market.’</p> <p>4.4.3 Amend the second sentence to add, between “evidence” and “that”, ‘to the satisfaction of the local authority’.</p> <p>4.4.4 Replace the last bullet point with: ‘Their current main place of permanent work is within the Parish or the neighbouring NKDC area and has been for a continuous period of twelve months.’</p>	
5	<p>Under the sub-heading “9. Historic Character”:</p> <p>5.1 Delete the second sentence of paragraph 9.13.</p> <p>5.2 Within Policy 6:</p> <p>5.2.1 Add a new element to Policy 6 as follows: ‘The non-designated heritage assets included in Appendix B are recognised for their historic significance, as detailed.’</p> <p>5.2.2 Amend the existing element 1 to become element 2 as follows: “Development proposals likely to affect a heritage asset, including those identified in Appendix B, must be accompanied by a heritage statement.”</p> <p>5.2.3 Amend the existing element 2 to become element 3 as follows: ‘Where a development proposal directly or indirectly affects a non-designated heritage asset, support for that proposal will depend on a balanced judgement of the scale of any harm or loss, and the significance of the asset.’</p> <p>5.3 Within Policy 7:</p> <p>5.3.1 Delete “1.”.</p> <p>5.3.2 Reword Policy 7 as follows: ‘Where a planning consent is required, to be supported development proposals at the St John’s Craft Workshops must demonstrate their compatibility with sustaining the use of these historic buildings as a group and their character.’</p>	For clarity and to meet Basic Condition 1
6	<p>Under the heading “10. Commercial and Retail Uses”:</p> <p>6.1 To paragraph 10.3 add: ‘(see Map 4)’.</p> <p>6.2 Within paragraph 10.9 delete “(Use classifications for shops and businesses is shown in Appendix E)”.</p> <p>6.3 Within Policy 8:</p> <p>6.3.1 From element 1 delete “as shown on Map 4”.</p>	For clarity and accuracy and to meet Basic Condition 1

	<p>6.3.2 To element 1(b) add ‘, and any other future users or residents’.</p> <p>6.3.3 Delete element 2 and renumber element 3 accordingly.</p> <p>6.3.4 Within element 3 add a comma between “suitable” and “landscaped”.</p>	
7	<p>Under the sub-heading “11. Employment”:</p> <p>7.1 Provide a Map 5 showing in outline the Sleaford Road Industrial Estate derived from the Policy Map of the Central Lincolnshire Local Plan; add to paragraph 11.4 ‘(see Map 5)’.</p> <p>7.2 Within Policy 9:</p> <p>7.2.1 In the title delete “(including any extensions into the South East Quadrant)”.</p> <p>7.2.2 Delete element 2 and renumber element 3 accordingly.</p> <p>7.3 Within Policy 10 delete “1.”.</p> <p>7.4 Within Policy 11:</p> <p>7.4.1 Delete “1.”.</p> <p>7.4.2 <i>In bullet point two replace “not introduce adverse impacts” with ‘not make a severe impact’.</i></p>	For clarity and accuracy and to meet Basic Conditions 1 & 3
8	<p>Under the sub-heading “12. Community Facilities”:</p> <p>8.1 Delete references to “services” from the pre-amble paragraphs to Policy 12 ie</p> <ul style="list-style-type: none"> • in the first sentence of paragraph 12.2 delete “and services”; • in the first bullet point of paragraph 12.3 delete “services and” and in the second bullet point delete “key services and” twice; • in the opening sentence of paragraph 12.6 replace “services and” with ‘community’. <p>8.2 In paragraph 12.6, under the heading “Within the village centre” delete the first 12 entries so that the revised list commences with “Doctors’ Surgery”, and under the heading “Outside the village centre” delete the first 3 entries so that the revised list commences with “Day Nursery” and delete the last entry “Open green spaces”.</p> <p>8.3 From paragraph 12.8 remove “(Appendix D)”.</p> <p>8.4 Within Policy 12 element 2:</p> <p>8.4.1 Replace “valued community asset” with ‘community facility’.</p> <p>8.4.2 Replace “conclusively demonstrated” with ‘demonstrated to the satisfaction of the local planning authority’.</p> <p>8.4.3 Delete bullet point 3.</p>	For clarity and accuracy and to meet Basic Conditions 1 & 3

9	Delete Policy 13 but retain the pre-ambule paragraphs 13.1 – 13.6; renumber subsequent Policies accordingly.	For clarity and to meet Basic Condition 1
10	<p>10.1 Under the heading “13a Maintaining Separation” delete Map 5 (a new Map 5 was created earlier), paragraph 13.13 (and renumber subsequent paragraphs accordingly) and Policy 14 (and renumber subsequent Policies accordingly).</p> <p>10.2 Remove heading 13b (and renumber subsequent sections accordingly); retitle Map 6 and Policy 15 as ‘Areas of Separation’; reference the source of the data for the Map.</p> <p>10.3 In Map 6 replace the reference in the key to the Canwick Heath draft Open Space Plan with a reference to the South East Quadrant Broad Concept Plan and Design Code (2020) and amend the extent of the related green areas on the Map to reflect the plan at Figure 1.1. of the Concept Plan.</p> <p>10.4 Within Policy 15 (now retitled and renumbered as Policy 13):</p> <p>10.4.1 Add a new element 1 as follows: ‘New development within the South East Quadrant beyond Bracebridge Heath Parish must be clearly separated from proposed development within the South east Quadrant that lies within the Neighbourhood Plan area in order to maintain the separate identity of Bracebridge Heath. This will be delivered in accordance with the strategic open space areas identified within the Broad Concept Plan and Design Code.’</p> <p>10.4.2 Add back element 2 of the original Policy 14.</p> <p>10.4.3 Amend element 1 of Policy 15 to read: ‘Development proposals, including changes of use, within the Lincoln Edge Green Wedge must demonstrate either that they are not contrary to or detrimental to the functions and aims of Green Wedges, or that it is essential that they are located within the Green Wedge and the benefits override the potential impact on the Green Wedge.’</p> <p>10.4.4 Follow the above with elements 2 – 4 of Policy 15 reduced and reworded as follows: ‘4. In relation to the Green Wedge at the western edge of the village any development proposal in this location should:</p> <ul style="list-style-type: none"> • not increase the visibility of the village from the Witham Valley floor to the west; and • avoid urbanisation of the Viking Way Route and any encroachment on this green space. <p>5. Development proposals within close proximity to the Green Wedge should retain and where possible enhance connectivity to the Viking Way.’</p>	For clarity and accuracy and to meet Basic Conditions 1 & 3
11	<p>Under the sub-heading “13c. Open spaces, sports facilities, and recreation Facilities”:</p> <p>11.1 Renumber the section as 13b.</p>	For clarity and accuracy

	<p>11.2 Amend Map 7 by adding in the Local Green Space titled “The Hillies”.</p> <p>11.3 Within Policy 16 (now renumbered as Policy 14):</p> <p>11.3.1 Reword the second sentence of element 1 as: ‘Recreation and playing field space will be safeguarded from development unless it can be demonstrated that:’</p> <p>11.3.2 Reword the second sentence of element 2 as: ‘Open spaces should be of high quality and design with appropriate attention to:</p> <ul style="list-style-type: none"> • potential for adaptability; • accessibility for all users; • opportunities for formal and/or informal play and exercise; • incorporation of natural features such as trees and other vegetation to create opportunities for biodiversity net gains; • linking into the wider green infrastructure network; • creating an attractive natural landscape.’ 	<p>and to meet Basic Condition 1</p>
<p>12</p>	<p>Under the heading “14. Designating Local Green Space”:</p> <p>12.1 Within the heading renumber the section as 13c, reposition it before section 13d, and amend the paragraph numbers accordingly.</p> <p>12.2 In paragraph 14.1 add to the “NPPF” reference ‘paragraphs 101 – 103’.</p> <p>12.3 In paragraph 14.3 delete “(see attached map)”.</p> <p>12.4 In paragraph 14.4:</p> <p>12.4.1 Replace “to ensure that the vision of parishioners and the Central Lincolnshire Local Plan keep Bracebridge Heath as a separate community from adjacent villages, is adhered to, including the proposed Canwick Heath and Lincoln.” with ‘as follows:’.</p> <p>12.4.2 Delete the entry for Space 1 and renumber the other Spaces accordingly.</p> <p>12.4.3 To the entry for Space 3 add: ‘This space has been the village’s cricket ground since 1948, and previously in the 1920’s and 30’s (https://cricketlincs.lincoln.ac.uk/clubs/bracebridge-heath/).’</p> <p>12.5 Replace Map 9 (now renumbered Map 8) with 3 maps individually identifying the designated Local Green Spaces (renumbered as 1 – 3 cross-referencing to the Policy) at a scale which allows the boundaries of the spaces to be identified with absolute clarity.</p> <p>12.6 Rewrite Policy 18 (now renumbered as Policy 15) as: ‘The spaces as shown as Map 8 are designated as Local Green Spaces: 1. The Hillies</p>	<p>For clarity and accuracy and to meet Basic Condition 1</p>

	<p>2. Cricket Pitch 3. Lancia Green.</p> <p>The management of development within these areas will be consistent with that for development within Green Belts as set out in national policy.'</p>	
13	<p>Under the heading "13d Locally important views":</p> <p>13.1 Renumber the paragraph numbers as appropriate.</p> <p>13.2 In paragraph 13.21 replace "protected" with 'respected'.</p> <p>13.3 Rewrite paragraph 13.23 as: 'All development proposals must demonstrate regard for the Landscape Assessment carried out by NKDC (www.n-kesteven.gov.uk/residents/planning-andbuilding/planning/planning-applications/north-kesteven-landscape-character-assessment/) The important views identified here must be regarded as sensitive to development that would obstruct or detract from their value. The indicative positions of these views are shown on Map 9.'</p> <p>13.4 Amend Map 8 to renumber it as Map 9 and remove any view vector or part of a view vector that is beyond the boundary of the Neighbourhood Area; amend the numbering and key to the Map accordingly.</p> <p>13.5 Within Policy 17 (now renumbered as Policy 16):</p> <p>13.5.1 In the opening sentence replace "views are designated" with '(illustrated in Map 9) are regarded'.</p> <p>13.5.2 Amend the view listing to accord with the revised Map 9.</p> <p>13.5.3 Rewrite the last sentence as: 'Development proposals that will impact on a locally important view should be accompanied by a proportionate assessment of how the significance of the view has been taken into account and the steps necessary to address and minimise any adverse impact.'</p>	For clarity and to meet Basic Condition 1
14	<p>14.1 Within the heading "15. Transport and Public Rights of Way" amend the section number to 14 and amend the paragraph numbers accordingly.</p> <p>14.2 Within Policy 19 (now renumbered as Policy 17)" reword the second sentence of element 1 as: 'Connectivity with the wider network should be achieved wherever possible.'</p> <p>14.3 To Map 10 add a source reference.</p>	For clarity and to meet Basic Condition 1
15	<p>15.1 Within the heading "16. Implementation and Monitoring" amend the section number to 15 and amend the paragraph numbers accordingly.</p>	For clarity and accuracy

	15.2 In paragraph 16.4 replace “in the neighbourhood area to ensure that the ambitions of policies LP2 and LP4 of the Central Lincolnshire Local Plan are achieved” with ‘in the Neighbourhood Area as set down in Policies LP2 and LP4 of the Central Lincolnshire Local Plan’.	
16	16.1 Delete the Appendix D headed “Use classes definitions from September 1st 2020”; amend the Contents page accordingly. 16.2 Check the content of the Glossary against the definitions provided in the NPPF2021 Annex 2.	For clarity and accuracy