

BRIZE NORTON NEIGHBOURHOOD PLAN

REG 16 CONSULTATION

RESPONSE TO EXAMINER QUERIES BY BRIZE NORTON PARISH COUNCIL

Context for Our Response

Brize Norton has been subject to development pressure from Carterton in recent years. Expansion within the parish has occurred on the western side of Carterton where in recent years, at Brize Meadows, construction has proceeded at pace (circa 550 units built of 799 homes proposed).

The growth of the Carterton Sub Area was promoted in the existing Local Plan over the Plan period to 2031 but when Brize Meadows was originally proposed, as a major increase in housing within Brize Norton parish, it was clearly enunciated in the Local Plan that further incursions into the countryside would not be supported in and around Brize Norton. This is especially important to the character and identity of the village. The growth of development in Brize Norton parish means it has made a very significant contribution to the Carterton Sub Area target and is a key reason why no sites are identified or allocated in the new BNNP.

However, various landowners and developers have aspirations to secure a huge increase in housing development to the North and East of Brize Norton in the emerging Local Plan.

NB. The latest information received is that Bloombridge (350 homes) and Lonestar (3,000 homes and employment land for 3,900 jobs) are not going to wait for the Local Plan 2041 but will go ahead as speculative proposals)

These proposals would go far beyond the Local Plan for the Carterton Sub Area and would add a minimum of circa 6,700 new homes within Brize Norton parish, with impacts to landscape, farming, nature, and the existing historic settlement plus adverse effects arising from traffic congestion, including pollution – air quality, noise, vibration, lighting and so on. One factor relied upon by promoters of development locally, the possible rail link to Carterton, has recently been ruled out by the Government.

Brize Norton Parish Council have prepared an attached note (see APPENDIX) which sets out the recent history of this interest which commenced prior to the commencement of the Local Plan 2041 process in 2022. Although the latest NPPF imposes higher housing targets within West Oxfordshire, these would be distributed across the whole District and the new WOLP 2041 would need to provide evidence to support delivery of these targets.

Overall then the Neighbourhood Plan does not envisage or desire large-scale speculative development within the wider parish involving the loss of farmland and nature. Whilst it is difficult to predict at this stage what such future proposals might be, if any, the Neighbourhood Plan will provide a rational basis for decision making which should be supported by the emerging Local Plan to protect the character and identity of the village and its rural hinterland.

General

The Plan is largely silent on its relationship with the emerging Local Plan. This has attracted commentary from the development industry. Please can the Parish Council comment on its approach to this matter. On a related point, Section 8 comments positively about the implementation and monitoring of the Plan. However, does the Parish Council have any intentions to undertake a review of the Plan (if necessary) once the emerging Local Plan Review has been adopted? Could such an approach be weaved into the proposed twelve-month review cycle in Section 8 of the Plan?

Response: It is understood that the Preferred Option for the emerging Local Plan is that the consultation will now take place in summer 2025, inspection will be early 2026 with adoption in late 2026. It is the intention that BNPC will review the new Local Plan once it has been adopted or within 12 months of the NP being made.

Oxfordshire County Council request that wording is added under the **Oxfordshire Minerals and Waste Plan** in Section 4, adding text to the last paragraph on page 17 as follows, and this is acceptable to the BNPC:

“The Minerals and Waste Local Plan Policies Map (South), safeguards mineral resources for future use through policy and a Mineral Safeguarding Area is identified identifies a mineral strategic resource area in the north of the parish of Brize Norton. Mineral extraction is a County Matter and should therefore be excluded from Neighbourhood Plans. The Minerals and Waste Plan includes policy on restoration and restoration would be required by any planning permission for extraction ”

Policies

CLH1

The policy advises that development proposals will be assessed against all relevant development plan policies. In this context, I am minded to recommend modifications to the policy so that it sets out its various requirements as matters to be addressed by development proposals rather than to comment that proposals will be supported. Does the Parish Council have any comments on this proposition?

Response: BNPC is agreeable to a change in the introduction to the policy wording along the lines suggested. Therefore, the policy wording should commence as follows *“In addition to all relevant policies in the Development Plan, proposals for new development should seek to enhance the distinctive character and identity of the settlement and its relationship to the surrounding countryside taking into consideration the following matters:”*

There appears to be a conflict between the supporting text and the policy. The former comments that the Plan does not seek to protect all the views listed in Appendix 9 and a limited number of Key Views that are specifically required to be protected are set out in Policy CLH2. The latter comments that where existing views encompass character as identified in appendix 9 (including existing views within the village, as well as to and from the village and of the wider parish), layout designs should show how these have been integrated and, where not possible, what mitigation can be delivered.

Is this an error, or is it related to the comment about 'character' in the policy? If it is the latter, how would a developer and the District Council be able to identify which views (beyond those identified in Policy CH/2) encompass elements of the 'character' of the neighbourhood area?

Response: This policy considers those areas that are more directly relevant to the integrity of the vernacular character of the village and its separate sub areas as set out in the Brize Norton Design Code. The images shown highlight these more inward-looking views as examples.

The 2019 Landscape Character Assessment does not define the village itself as having a specific landscape character albeit its identity and character does have considerable weight when considering these matters as a whole.

However when taken together with the green spaces in the Country Park, its setting to the north, its extension to the south and west of the settlement and finally the areas between the village and the RAF base this provides an overall setting with a strong relationship to all parts of the village. This requires a different approach to that of policy CLH2. It is functionally enclosed by the village or other development on the Carterton side to a great extent. This latter area includes some of the best arable land in the parish offering scope to maintain and enhance food growing opportunities such as allotments, close, i.e. within easy access on foot, to the village. Other areas too relate well to the sub areas and are very accessible for a range of purposes.

These areas contain many features which contribute to character both in the built and natural environment. The policy CLH1 endeavours to protect and enhance these aspects of character and identity. The locations indicated by the selection of a number of images in the rationale for this policy have already been compromised by recent development to an extent and include some of the most important approaches into the village. This has impacted their character and identity, and this policy is concerned to achieve a much better balance in the future. Smaller infill developments or proposals for development within the village setting and spaces should strongly reflect the features shown in these images, including design and layouts as a result. *In contrast policy CLH2 is concerned with the character and identity of the wider parish and its landscape hinterland.*

However, to avoid any confusion or conflict between policy and rationale it is suggested that wording in policy sub paragraph (ii) should be replaced amended to distinguish its purposes from those in CLH2 as follows : *"avoiding demonstrable harm to the key aspects of the vernacular integrity of the village and its immediate surroundings, spaces and approaches, ensuring that all reasonable measures can be taken to preserve existing character and identity. In particular infill development should have regard to the use of materials, design and layout having regard to the Brize Norton Design Code"*.

CLH2

How have the nine views identified in the policy been selected from the 34 views identified in Landscape Character Assessment (Appendix 8)?

Response : The 34 views shown in the Landscape Character Assessment (LCA) carried out in 2019 provided an initial assessment of various aspects of character and identity influenced by the rural landscape. The Landscape Character Assessment (LCA) acknowledges the many previous landscape studies of this area and points to the fact that this type of landscape pattern is one of sparsely settled landscape, with settlements avoiding the highest most exposed areas and taking advantage of minor valleys and hillsides. It notes that villages in these character areas often feature an

elongated form with a north south orientation with buildings generally following the linear pattern of roads as is the case with Brize Norton.

It goes on to say that this topography and sparsely vegetated landscape structure creates high inter visibility across the parish making it difficult to integrate or absorb development and even to screen it from views. Figure 18 of the LCA indicates the relationship between zones of inter-visibility and views and it is true to say that the greatest extent of overlapping of these zones is picked up by the nine Key Views, the subject of this policy.

Over time this base evidence has been impacted by development. The areas in the west and south west of the parish have already been largely developed, including the RAF base and Carterton's growth over recent years into Brize Norton. The threat of further development in the largely untouched rural hinterland to the North West, North, North East, East and South East of the parish has been pivotal to the further definition of the most important Key Views that remain in these areas. The Key Views highlight areas of key rural hinterland and landscape quality which are under threat and the note by BNPC explains the recent emergence of development propositions impacting the nine Key Views A to I.

Key aspects referenced in the LCA are shown in Appendix 8 as follows :

Area 1 _ Open Limestone Wolds Estate Farmland comprising large scale, productive, intensive arable rolling farmland (few trees, weak hedgerows, dry stone walls, integrity of vernacular character of the village) ; *NB. Key views D, E, F and G are identified in this area.*

Area 2 – Open Rolling Clay vale Village Farmland comprising patchwork of small, medium sized fields, productive, mostly arable use, prominent long-distance views; (hedgerows, vegetated field boundaries, integrity of vernacular character of the village). *NB. Key views A,B and C are identified in this area.*

Area 3 – Country Park and its Setting comprising rolling topography offering views to the agricultural hinterland contained in part by woodland;(dry stone walls, hedgerows, integrity of vernacular character of the village).*NB. Key Views H and I are identified in this area.*

Of the 34 views identified, the 9 Key Views assessed are therefore those that define local character and identity rooted in the surrounding landscape which have not been compromised by recent development and represent the best of the rural hinterland that remains.

CLH3

Plainly this is an important policy in the Plan. The significance of the proposed Strategic Buffer Zones (and the wording used) is such that the approach could be seen as of a strategic rather than a parish nature. Furthermore, whilst the 'Strategic Buffer Zones' and the 'Area of Sensitivity to Change' have different purposes, the effect of the policy on the two separate designations is similar.

Response: The potential risks to the character and identity of the parish arising from potential coalescence stems from the West Oxfordshire Local Plan 2031, policy OS2. At the Reg 14 stage of the BNNP discussions were held with WODC about this policy and one of the areas designated was agreed to be changed to an Area of Sensitivity to Change as it is in fact could not be supportable solely on the grounds of potential coalescence. No other changes to the Strategic Buffer Zones were proposed at that time. *It is agreed that the effects of the policy on these two designations is indeed similar.* For example, while it would be important to protect the setting and character of the village

from urban effects in both these designations (such as not permitting street lighting) preventing potential coalescence is a more effective tool in the first instance.

Whilst WODC now appear concerned about the use of the term Buffer Zone, this is in existence in the made Hailey NP. This has a policy about Buffer Zones (E3) that relates to small local gaps between Hailey and other local places. This contrasts with Brize Norton where the risk of coalescence is very pronounced from Carterton which abuts Brize Norton not in a single location but extending alongside this linear dispersed settlement over a significant distance. The scale of this and its unique characteristics and potential impacts led to the term Strategic Buffer Zone being selected.

The Local Plan also used wording to protect or enhance the local landscape and setting of settlements. Policy CA5 in the Local Plan states policy should enhance and extend the green buffer on the northern edge of Carterton including between Carterton and Brize Norton village as well as protection and enhancement of the character and setting of Carterton and the identity of neighbouring villages.

Policy over the last years has provided a green corridor between Carterton and Brize Norton, setting a limit to Carterton's growth in this direction. Yet though Brize Meadow has allowed Carterton to grow into Brize Norton parish (799 homes), the green corridor has been maintained.

In many respects even more areas might be termed Areas of Sensitivity to Change, bearing in mind current challenges. Some of the principles in the policy could apply to future coalescence threats arising in the rural areas of the parish but these cannot be anticipated or delineated at this point. This makes holding the line against existing coalescence risk even more important.

However this policy tries to be more specific about coalescence between Brize Norton and Carterton and Brize Norton and the RAF base which are able to be delineated. It also applies to the sub areas within the village which are distinct. These areas are "Strategic" in nature in that their loss to development would dramatically increase coalescence, set a precedent for incursion into the countryside and undermine the character and identity of Brize Norton. Indeed, these buffer zones arguably have a special character as befits a Domesday Book era settlement with listed buildings, historic pathways and roads, materials and appearance.

The recent development of Brize Meadow in close proximity with a tranquil sub area around Burford Road shows what impact coalescence can have, and this recent history places a great responsibility on the Neighbourhood Plan to avoid this in the future.

In Hailey Neighbourhood Plan policy E3 refers to Buffer Zones which apply to very small specific areas where say a small distance separates the existing villages. This is a different situation to Brize where a strategic corridor has separated the village along its entire interface with Carterton and where any breach would potentially join it to the town.

In addition, what is the specific thinking behind the identification of the Area of sensitivity to change when several other parts of the neighbourhood area could be seen as sensitive to change (either because of the relationship between Brize Norton and the surrounding countryside, or because of the relationship between Brize Norton and the RAF base and/or Carterton). It would be helpful if the Parish Council elaborates on its approach to these matters.

Response: Existing Local Plan states in para 9.3.65 that " Land to the north of Carterton which falls within Brize Norton Parish is considered to be poorly related to the town, relatively remote from the town centre and segregated by the Kilkenny Lane Country Park. It is poorly served by public

transport and development in this location would require significant improvements to the Burford Road.”

It adds in para 9.3.66 “Land to the north east of Carterton which also falls within Brize Norton Parish is similarly poorly related to the town and more remote from the town centre. Parts of the site are also very open and elevated and development in this location would represent a significant incursion into open countryside”.

If it were being argued that the open areas of the rest of the parish is potentially an Area of Sensitivity to Change this perhaps should require a separate policy governing how development should be handled in these other places but due to the specific local implications of the Country Park and its setting it was agreed with WODC that the descriptor would be amended from Strategic Buffer Zone in this locality. A boundary was placed drawing upon previous assessments.

The Area of Sensitivity to Change is not one characterised by a coalescence risk as such but broadly reflects a zone which if developed wholly or in part would undermine the Country Park’s setting, (making it an urban park in effect) which was also established as a barrier to Carterton’s growth to the north of that settlement. This would encourage development leap frogging the green corridor that policy has created between Carterton and Brize Norton.

This remains the position of BNPC.

Do the various Zones/Area need to be defined and drawn on a map base or could the matters be expressed more generally?

Response : WODC referred to the Hailey Neighbourhood Plan policy E3 Buffer Zones as not having a specific area denoted on a plan even though there were three specific areas of coalescence concern. In Brize Norton these areas are delineated already by realities in the ground other than in the case of the Area of Sensitivity to Change. The latter was originally excluded from Local Plan as a development area - but WODC also used this wording to protect views from Burford Rd and proposed it in discussion.

In relation to proposed Strategic Buffer Zone B, do the various numbered sub-areas suggest that the Zone is already safeguarded by the series of strategic recreation and sustainable drainage facilities?

Response : Moving from east to west along Carterton Road, the southern area of the country park will be owned by BNPC (this includes the three attenuation ponds). Next is the field for ‘sports pitches’ which will be owned by WODC. Finally, at the western end of Carterton Road, is the large, grassed area which includes an attenuation pond, which is owned by Thames Water. This particular attenuation pond is a large, flat area of grassland which is used by walkers, joggers etc. and therefore BNPC is requesting a Local Green Space designation.

It would be helpful if the Parish Council responded to the comments from the District Council on the detailed elements of the policy.

Response: BNPC objects to retitling this policy as suggested but would agree to the following:

“Strategic Buffer Zones and Preventing Coalescence” and agrees to inserting an introductory line into the policy as follows:

“The provision of strategic buffer zones is intended to protect the setting and character of the village from development proposals which could lead to coalescence and or significant incursions into the

countryside. This policy will require development proposals to take the following matters into consideration:"

Oxfordshire County Council has commented that on page 48 of the Neighbourhood Plan the following text in the fourth paragraph be deleted and this is agreed by BNPC.

"Where mineral extraction is proposed which impacts the areas in Brize Norton Parish, including these buffer zones, the Area of Sensitivity to Change and other green spaces, these proposals should guarantee that on completion they will be restored to an agreed Restoration Plan."

WODC has also commented on the criteria in this policy.

BNPC responses are set out below:

Response to suggested amendments

Criterion (i) Do not support this suggested change.

Criterion (iii) Do not support this suggested change. Urban street lighting would undermine the character of the village and especially within the Area of Sensitivity to Change where the function, appearance and character of the Country Park and its setting would be significantly impacted.

Agree

Criterion (iv) Do not support this change as it would open the door to development north of the Country Park within its own setting. The existing Local Plan uses wording about incursion into the countryside see above.

Criterion (v) BNPC suggests that deleting the last sentence of the policy will be sufficient.

Criterion (vi) This is agreed.

Criterion (vii) Agree to amend partly as follows: "...trees should also be retained where possible and enhanced."

Criterion (viii) Disagree as this will weaken the policy.

Criterion (ix) Agree to reword this along lines of policy OS2 in WOLP 2031 which concerns loss of important open space and features but also to add in words about adjoining development that might impact upon its setting i.e. overlooking, overshadowing, visual appearance and so forth.

Criterion (x) Agree. The supporting text in the rationale should add the following words as proposed by Oxfordshire County Council;

"Highway land within the Strategic Buffer Zones is excluded from the requirements of Policy CLH3. The buffer zone designation in no way precludes the use of highway land by public utilities or for necessary highway works and improvements. No works on highway land can take place without the County Council's approval. The buffer zone designation will not hinder access by the public over highway land".

CLH4

This is a good policy which is underpinned by Design Guide. In the round, it is a very good local response to Section 12 of the NPPF. For clarity, in ii is the reference to 'areas' related to the 'character areas' in the Assessment?

Response: Yes, this relates to character sub areas as set out in the Brize Norton Design Code.

Note for Examiner and WODC: Criterion (v) covers points that are already addressed in policy SD1 so BNPC is in agreement that this criterion can be deleted.

CLH5

In ii the reference to the Hamilton-Baillie Associates document reads out of context both to the policy and to the parish. I am minded to recommend that it is relocated to the supporting text. Does the Parish Council have any comments on this proposition?

Response : Agreed.

Criterion iv is supporting text rather than a land use policy. I am minded to recommend that it is relocated to the supporting text. Does the Parish Council have any comments on this proposition?

Response : Agreed.

ENV1

The policy takes a positive approach towards the designation of local green spaces. It is underpinned by the comprehensive details in Appendix 27. The final paragraph of the policy is supporting text. I am minded to recommend that it is relocated to the supporting text. Does the Parish Council have any comments on this proposition?

Response : Agreed. However Oxfordshire County Council prefer to use the wording in the supporting text as follows which is agreed :

“Highway land within the designated Local Green Spaces is excluded from the requirements of Policy ENV1. The Local Green Spaces designation in no way precludes the use of highway land by public utilities or for necessary highway works and improvements. No works on highway land can take place without the County Council’s approval. The LGS designation will not hinder access by the public over highway land”.

CF1

Does this policy bring any added value beyond the relevant policies in the Local Plan and the District Council’s general approach to the delivery of infrastructure?

Response: WODC advise that the context for this policy is policy OS5 in the WOLP 2031. Although there is no CIL in place currently WODC also helpfully suggest that home working is an area that could be given more weight in this policy.

Therefore BNPC is agreeable to extra text being inserted as follows in the rationale:

“Reference should be made to the Council’s Developer Contributions Supplementary Planning Document (SPD) which sets out guidance for likely infrastructure requirements. In addition the support for homeworking in the village can be aided through extra infrastructure being provided. The village has seen some investment in super-fast infrastructure (FTTP) in recent years so development should enable connectivity to be enhanced and where a larger scheme is proposed community hub provision including scope for SME use and or self-employed or extra investment in Elder Bank Hall extension and the new Pavilion.”

BNPC propose to add a line to policy as follows to criterion (ii):

“Particular effort should be made to enhance facilities in new homes and or community facilities to enable home or community hub working and these requirements should be reflected in any

development proposals; they may include further contributions to Elder Bank Hall Extension or the the New Pavilion In addition regard should also be given to WODC's Developer Contributions SPD in working up development proposals."

It is worth noting that stewardship provisions are increasingly required for larger developments, and this is often referenced in planning policy.

SD1

The initial sentence of the policy reads as a comment rather than as a land use policy. In addition, the District Council will give appropriate weight in the development management process to the various material planning considerations listed as criteria in the policy. In this context, I am minded to recommend that the policy retains the various issues whilst referring to them as important matters for contributing to the local delivery of sustainable development whilst acknowledging that all the matters will not necessarily apply to each planning application. Does the Parish Council have any comments on this proposition?

Response: BNPC agrees to this recommendation. WODC has also made some similar comment see below.

Representations

Does the Parish Council wish to comment on any of the representations made to the Plan?

I would find it helpful if the Parish Council commented on the representations made by:

- **Bloor Homes and Christ Church –**
- **Harper Crewe HCBB Limited – This is Carter Jonas/Bloombridge.**
- **Lone Star Land Graftongate**
- **Oxfordshire County Council**

Response: See attached Appendix from BNPC with respect to the representations from three land agents and also APPENDIX attached- Overview of Planning Situation

Responses to Oxfordshire County Council are incorporated into this document see above.

The District Council proposes a series of revisions to certain policies and the supporting text in the Plan. It would be very helpful if the Parish Council commented on the suggested revisions.

Response: Some of the commentary above addresses WODC comments. Our response overall to WODC is in a separate document, see attached.

OVERVIEW OF PLANNING MATTERS IN THE PARISH OF BRIZE NORTON AND INTERACTIONS WITH SAVILLS / BLOOR HOMES, NEXUS / LONESTAR, AND BLOOMBRIDGE.

INTRODUCTION

We would like to start this document by informing that BNPC has a good working relationship with Chris Hargraves (WODC Planning Policy Manger) and his team. He has recently been promoted to Head of Planning.

2022

Prior to the commencement of the Local Plan 2041 process by WODC in 2022 (Initial Scoping), BNPC was made aware of the aspirations of Bloor Homes / Savills, Nexus / Lonestar, and Bloombridge, for land within the Parish of Brize Norton.

BNPC made it quite clear to all three parties, although we were willing to receive a presentation from each of them so we could understand their aspirations, but in the interests of transparency and to avoid any accusations of ‘deals behind closed doors’, any consultations must be made in our village hall with our Community present. All three parties agreed with this process. At this stage, the proposals were very much an ‘overview’ rather than containing any detail.

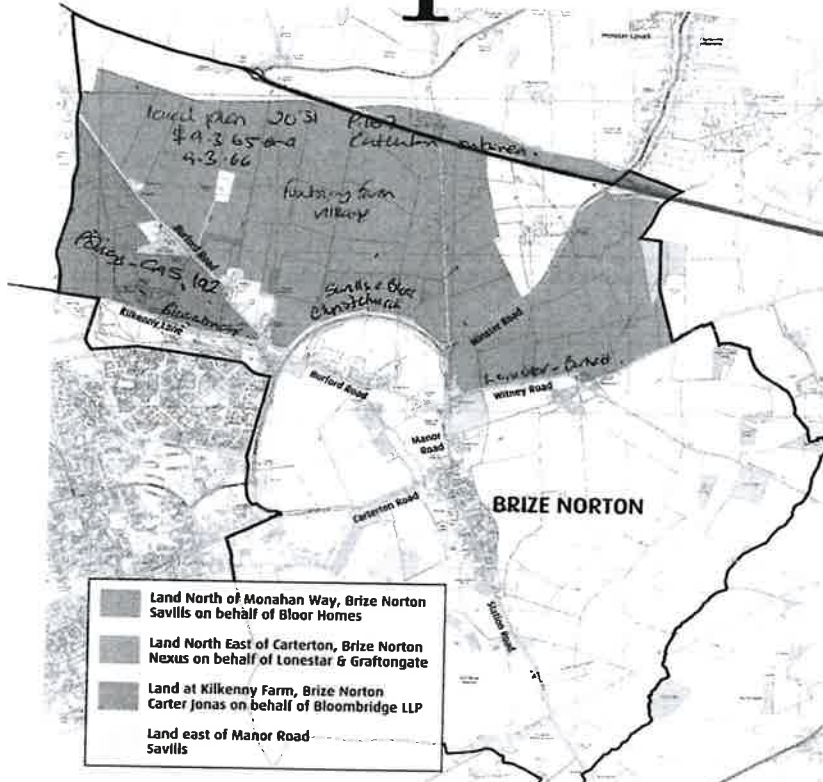
2023

In this year, the WODC Local Plan 2041 reached the next stage (Focused Consultation) which asked landowners to submit any areas of land they wish to put forward for consideration for future development. It should be noted that at this stage, all three land areas promoted by the above three parties, were identified as relating to Carterton with no mention of them actually being in the Parish of Brize Norton. BNPC contacted Chris Hargraves about this ‘omission’ to which he agreed and therefore he instructed his team to update the on-line data.

AUGUST 2023

As this information was now in the public domain, for transparency, and to give our community the opportunity to understand the extent of the land areas being proposed for development, BNPC published an article in the August edition 2023 of our Parish magazine, Brize Norton Breeze which is included below.

BRIZE NORTON AREAS for consideration in the local plan 2041



By Brize Norton
Parish Council

West Oxfordshire Local Plan 2041

A Local Plan is a document that sets out how development, including housing, business construction, and infrastructure can best benefit the area the Council is

responsible for.

West Oxfordshire District Council (WODC) currently has a Local Plan in place which runs from 2011 to 2031. However, they are in the process of reviewing the content to allow it to be extended to 2041.

In 2022, they ran an initial 'scoping' consultation seeking early views on what topics the new plan should be looking to focus on. One of these topics

relates to housing needs and where housing should be built so WODC have asked landowners to submit any areas of land they wish to put forward for CONSIDERATION for future development.

“One of these topics relates to housing needs and where housing should be BUILT”

Your Parish Council considers for the sake of transparency, that it is their duty to inform the residents of Brize Norton that of the 27 sites that have been put forward for consideration in West Oxfordshire, four are in the Parish of Brize Norton.

As you will see from the map to the left, three of the areas are in the north-west, north, and north-east of the Parish. The fourth is within the village boundary.

The Parish Council will keep you informed of any updates regarding these land areas as and when we are made aware of any changes in their status.

If you would like to read the WODC Consultation Summary report which is in the public domain, it can be found at: <https://www.westoxon.gov.uk/media/44zparsq/local-plan-2041-consultation-summary-report.pdf>

To contact
Brize Norton Parish Council, email Jo via
clerk@brizenortonparishcouncil.co.uk

It should be noted that as well as the three areas that have been previously discussed, there is an additional area (shaded in yellow) put forward by Savills but currently, no development plans are proposed.

MAY 2024

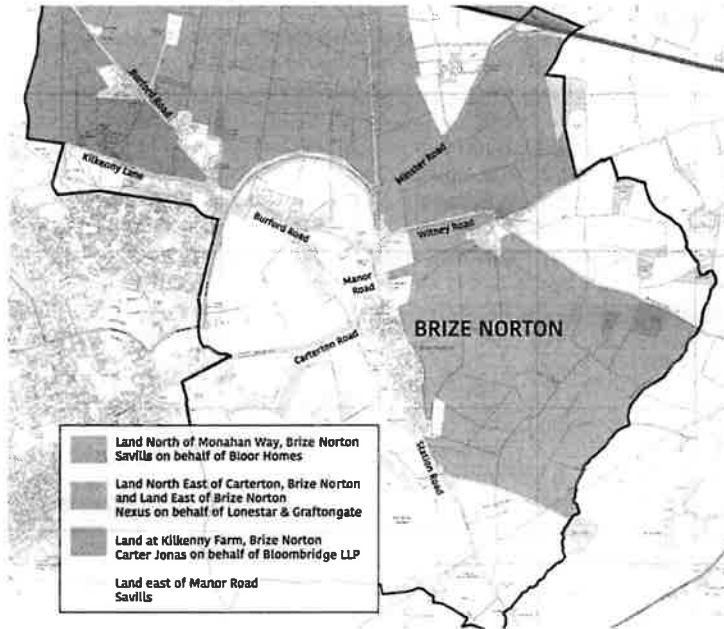
We invited Chris Hargraves to meet with us so we could show him the three sites and gain a greater understanding of the visual impact each one would have on the rural setting of our Parish. He was surprised at the sheer scale of the northern proposal as it looks so different in real life as opposed to looking at a plan on a table. Also, he was equally surprised at the topography of the land, he didn't realise the extent of the visual impact each proposal would cause. He stated that he would return to the Parish to avail himself of a longer time period to absorb the various impacts.

However, it was at this meeting that Chris admitted that WODC had made an error because they had not included the very large land area which encompasses the whole of the east side of the Parish which is also represented by Nexus / Lonestar. WODC have now updated their on-line data.

AUGUST 2024

Once again, to inform the community of this additional land area for consideration, BNPC published an article in the August edition 2024 of the Parish magazine, Brize Norton Breeze which is included below.

BRIZE NORTON AREAS for consideration in the local plan 2041



By Brize Norton Parish Council

West Oxfordshire Local Plan 2041

In the August - October 2023 edition of the Brize Breeze Magazine, we wrote about WODC updating their 2031 Local Plan to extend it to 2041. One of the functions of a Local Plan is to set out how development, including housing, business construction, and infrastructure can best benefit the area that they are responsible for

In this article, we illustrated on a map, the four areas that landowners had put forward for consideration for future development in Brize Norton.

These were:

Land at Kilkenny Farm, Brize Norton (highlighted in purple)

Land north of Monahan Way, Brize Norton (highlighted in red)

Land north east of Brize Norton (highlighted in green)

Land east of Manor Road (highlighted in yellow)

We have now had the opportunity to take the Planning Policy Manager around these sites so he could see first-hand, the influence any one of them would have on our Landscape Character and Key Views. At this meeting it was discussed that the WODC Consultation Document had omitted one very large area of land which had been put forward by the landowner! This is all the land to the east of the

“One of these topics relates to housing needs and where housing should be BUILT”

village from Witney Road down to the RAF Brize Norton runway approach lights and eastwards to the Parish Boundary.

We have highlighted this area in green because it is represented by the same land agent as the land to the north east of the Parish.

The Parish Council has received a presentation from each of the land agents (except land to the east of Manor Road) to show us their vision for their respective areas. We made it very clear to them that this was a presentation only and not a consultation. We advised them that if they wished to consult on their proposals, for transparency, it must be held in the Elder Bank Hall with members of our Community present.

We now await to hear from WODC as to how many houses and how much business construction will be required in the Carterton sub-area and in particular, in the Parish of Brize Norton. The new Labour Government could also have an influence on these numbers as they develop their own policy on housing numbers.

Please remember, all these proposals are speculative at the moment, but we will keep you informed of any updates regarding these land areas as and when we are made aware of any change in their status.

To contact
Brize Norton Parish Council,
email Jo Webb via
clerk@brizenortonparishcouncil.co.uk

Up until August 2024, separate presentations had been made to Brize Norton Parish Council and Carterton Town Council by the three parties.

Also in this month, we discussed with Chris Hargraves the idea of inviting all three parties to separate public consultations in our village hall so the community could hear firsthand their proposals. However, Chris requested we pause this suggestions until there was more clarity about how many homes are required and where they are likely to be focused. Once this is more fully understood, if appropriate and relevant, then we can continue with initial public responses.

SEPTEMBER 2024

Further discussions took place with Chris in September 2024. He advised us that the proposed WODC consultation on the 2041 Local Plan which was planned for October, will now not happen due to the changes in the NPPF made by the Labour Government. WODC will have to have Local Plan submitted for examination by June 2025 or else it will be subject to a new process which would take it out to 2026!

Chris hopes to have preferred policy options published by March 2025. He stated:

- There is likely to be an uplift in housing numbers in the plan period from the original calculation of c11,000 up to c18,000! Even though this is a very large uplift, it's the lowest of the Oxfordshire Authorities.
- With regards to the Carterton sub-area, it's too early to be specific but growth will have to be in adjoining Parishes.
- WODC's preferred approach would be through community engagement which would allow residents to be more informed with their feedback to the proposed 2041 Local Plan.

Also in this month, BNPC were approached by Ampyr Solar Europe regarding a proposal to build a solar farm in the adjoining Parish of Curbridge which is on our eastern boundary. However, the south west corner of the farm actually falls within the Parish of Brize Norton.

They requested to hold a public consultation in our village hall because of its size to accommodate their presentation boards and the number of expected attendees. BNPC collaborated with this company and a successful engagement took place.

In September, both Bloor Homes / Savills and Nexus / Lonestar, were waiting for the next stage of the Local Plan 2041 to ascertain the outcome of strategic land allocations in the Carterton sub-area.

However, in this month, Bloombridge took the decision not to wait for the Local Plan 2041 but to commence with a speculative application. On the 29th September, Bloombridge informed BNPC that they were holding a public consultation commencing the same day and it would run for two weeks!

BNPC immediately responded and questioned how it was possible to hold a public consultation about which the public have no knowledge of. BNPC advised them that the correct way to hold a public consultation is that they should advertise it on Social Media both in Brize Norton and Carterton and to place an advertisement in the Brize Breeze magazine with details of when and where it would be held. BNPC also reserved the hall on their behalf. Because the next magazine issue would be printed and distributed in November, BNPC advised that the consultation should run from 8th November for two weeks.

Bloombridge agreed to this plan of action.

BNPC can confidently state that they made every effort to rescue the situation by ensuring that Bloombridge carried out a proper consultation as their original proposal was completely inappropriate.

NOVEMBER 2024

A successful 'Bloombridge' community consultation took place with a very high turnout with residents from both Brize Norton and Carterton attending.

Also in this month, it was decided by both Brize Norton Parish Council and Carterton Town Council to form a joint 'Local Plan Working Group'. It was also agreed that any presentations made to the group would be held in Carterton Town Hall because they had a large meeting room, and any public consultations would be held in Brize Norton's Elder Bank Hall, i.e. the village in which the proposals may be built.

(N.B there was criticism from Brize Norton residents in 2016 that the public consultation for Brize Meadow was held in Carterton and not the Parish in which the development would be constructed. Many residents were unable to attend).

Moving forward, it means that the three parties would only need to make one presentation to the Councils which would not only eliminate any difference in their messages but for each Council to hear any questions raised at the meeting.

JANUARY 2025

Bloombridge attended the Local Plan Working Group on 9th January to discuss community feedback after their event held in November 2024. Unfortunately, no detailed response was provided at the meeting and the group requested comprehensive feedback data sheets.

On 30th January, Nexus /Lonestar presented to Local Plan Working Group, their vision for land to the north east and east of Brize Norton Parish. On slide 5 of their presentation, the importance of the Brize Norton Neighbourhood Plan Policy CLH2 - Key Views, especially relating to those overlooking the land areas they are representing have been identified.

FEBRUARY 2025

A summary of public consultation feedback was received from Bloombridge on 11th February.

The latest update regarding the Local Plan 2041, is that the consultation will now take place in summer 2025, inspection will be in early 2026 with adoption in late 2026.

As detailed above, Bloor / Savills and Lexus / Lonestar have presented their proposals although they are not finalised. Bloombridge have presented their proposal which is more complete.

Details of all three are as follows:

Bloor Homes/Savills, land in the north of the Parish (Foxbury Gardens).

- 3,000 homes
- Employment land (potentially 33ha/3,300 jobs)
- Two primary schools
- Local centre
- Community building

The infrastructure benefits for both communities would be:-

- A link road between Monahan Way and the A40 where a new roundabout will be constructed (Savills own land each side of the A40)
- A transport hub in the north of the development
- No secondary school but funds directed to improving Carterton Community College
- Initial comments is that Bloor Homes would prefer BNPC to maintain all the open public green spaces which would be funded by a suitable endowment.

It should be noted that as detailed in the 2031 Local Plan, land to the north east of Carterton which falls within the Parish of Brize Norton is poorly related to the town and more remote from the town centre. Parts of the site are also very open and elevated and development in this location would represent a significant incursion into open countryside. Carterton sub-area, item 9.3.66.

Lexus/Lonestar, land in the north east and east of the Parish (Unnamed).

Land to the east –

- 3,000 homes
- Two primary schools
- Secondary school/college
- Local centre
- Community building

Land to the north east –

- Employment hubs (3,900 jobs)
- Transport hub
- Hotel,

The infrastructure benefit for both communities would be:-

- Upgrading of the B4477 between Monahan Way and A40 to A road standard
- New west facing slip roads on/off the A40
- A relief road from Monahan Way roundabout, via the new village, to a new junction south of the existing village.
- Initial comments is that Lonestar would ‘gift’ the fields between the existing and new villages to BNPC. No details on funding to maintain these fields. Also, no mention regarding the maintenance of all the open public green spaces which should be funded by a suitable endowment.

It should be noted that these land areas have not been proposed for consideration in the 2031 Local Plan.

- 350 homes (Phase 1)
- Community Hall which Bloombridge assumes will be owned and managed by BNPC
- No comments regarding maintenance of all the open public green spaces which would need to be funded by a suitable endowment.
- There is no infrastructure benefit for either communities. To date, there are no details of improvements to Burford Road despite this specific topic being detailed in the Local Plan 2031 (Carterton sub-area, item 9.3.65).

It should be noted that as detailed in the 2031 Local Plan, land to the north of Carterton which falls within the Parish of Brize Norton is considered to be poorly related to the town, relatively remote from the town centre and segregated by Kilkenny Lane Country Park. It is poorly served by public transport and development in this location would require significant improvements to the Burford Road. (Carterton sub-area, item 9.3.65).

Conclusion

In the settlement hierarchy, Brize Norton is defined as a village (Local Plan item 4.14). The Local Plan goes on to state that villages are suitable for limited development which respects the village character and local distinctiveness and would help to maintain the vitality of these communities (Local Plan Policy OS2).

At the start of the 2031 Local Plan period, there were 382 dwellings within the Parish of Brize Norton of which 359 were within the village.

During the 2031 Local Plan period, Brize Norton village has increased in size from 382 dwellings up to 1,197, i.e. in excess of a threefold increase. This cannot be construed as limited development.

It is clear that Brize Norton has already delivered above and beyond its reasonable contribution.

All of these proposed developments are totally unacceptable as cumulatively they would create a massive expansion for Carterton at the expense of Brize Norton Parish by undermining the essential components of the Neighbourhood Plan. The infrastructure locally is not suited to this cumulative amount of development.

Furthermore, this expansion is not in accordance with the intended growth of Carterton and surrounding villages in the 2031 Local Plan. Should they all submit together, the NDP will assist the Local Plan to evaluate these proposals.

BRIZE NORTON NEIGHBOURHOOD PLAN (BNNP) REG 16 CONSULTATION

RESPONSE TO WEST OXFORDSHIRE DISTRICT COUNCIL BY BRIZE NORTON PARISH COUNCIL

Context for Our Response

Brize Norton has been subject to development pressure from Carterton in recent years. Expansion within the parish has occurred on the western side of Carterton where in recent years, at Brize Meadow, construction has proceeded at pace (circa 550 units built of 799 homes proposed).

The growth of the Carterton Sub Area was promoted in the existing Local Plan over the Plan period to 2031 but when Brize Meadow was originally proposed, as a major increase in housing within Brize Norton parish, it was clearly stated in the Local Plan that further incursions into the countryside would not be supported in and around Brize Norton. This is especially important to the character and identity of the village. The growth of development in Brize Norton parish means it has made a very significant contribution to the Carterton Sub Area target and is a key reason why no sites are identified or allocated in the new BNNP.

However, various landowners and developers have aspirations to secure a huge increase in housing development to the North west, north, north east, and East of Brize Norton in the emerging Local Plan. These proposals would go far beyond the Local Plan for the Carterton Sub Area and would add a minimum of circa 6,700 new homes within Brize Norton parish, with impacts to landscape, farming, nature, and the existing historic settlement plus adverse effects arising from traffic congestion, including pollution – air quality, noise, vibration, lighting and so on. One factor relied upon by promoters of development locally, the possible rail link to Carterton. However, this has recently been ruled out by the government.

Brize Norton Parish Council have prepared an attached note which sets out the recent history of this interest which commenced prior to the commencement of the Local Plan 2041 process in 2022. Although the latest NPPF imposes higher housing targets within West Oxfordshire, these would be distributed across the whole District and the new WOLP 2041 would need to provide evidence to support delivery of these targets.

Overall then the Neighbourhood Plan does not envisage or desire large-scale speculative development within the wider parish involving the loss of farmland and nature. Whilst it is difficult to predict at this stage what such future proposals might be, if any, the Neighbourhood Plan will provide a rational basis for decision making which should be supported by the emerging Local Plan to protect the character and identity of the village and its rural hinterland.

Response of BNPC to West Oxfordshire District Council Reg 16 Consultation

Our response follows the structure of WODC commentary. The overall positive response and suggested changes have been considered in detail.

Glossary of Terms

Response: BNPC agrees to insertion of wording as follows:

"The Neighbourhood Plan will form part of the statutory development plan alongside the West Oxfordshire Local Plan and other "made" neighbourhood plans that are in place in West Oxfordshire."

To clarify the Area of High Landscape Value is understood to be locally designated by Oxfordshire County Council. It is not a statutory designation but is a material consideration in planning decisions.

Part 2 of Brize Norton NP

Response: BNPC agrees to the insertion of the above wording again to clarify the status of the NP as part of the statutory Development Plan and in addition it is agreeable to add that Supplementary Planning Documents (SPDs) do not form part of the statutory Development Plan.

Furthermore BNPC agrees that it will be helpful to acknowledge that a new West Oxfordshire Local Plan to 2041 is in preparation.

In addition, BNPC agrees that in Section 2.2 the designation of the whole parish was logical in that it represents the parish boundary and was designated by WODC. Also, the settlement is defined as a linear dispersed settlement located within a rural landscape that is integral to the character and identity of Brize Norton. The parish is immediately adjacent and between the growing towns of Carterton and Witney where development pressures are increasing.

In Section 2.5 BNPC will explain further how the key issues were identified (as set out in the process in Section 2.4) with particular reference to the SWOT analysis in Appendix 18 of the BNNP.

Part 3 of Brize Norton NP

Response: The present population of Brize Norton parish is circa 2,375 ~~3000~~ and will rise to 3,000 by 2027. It can be expressed in the NP that this has increased significantly since the Carterton urban extension of Brize Meadow has been undertaken (799 homes) which falls within Brize Norton parish but is not an extension to the village itself. The map has been replaced with a clearer version.

Part 4 of Brize Norton NP

Planning Context

Response: BNPC will add to the text of Section 4.1 as follows, after the list of policies.

West Oxfordshire Local Plan 2031 is the statutory development plan for the district as a whole, adopted in 2018 and is the primary consideration in determining planning decisions. It sets out the settlement hierarchy and defines Brize Norton as one of a number of villages. As such it falls within policy OS2 which states that: *"The villages are suitable for limited development which respects the village character and local distinctiveness and would help to maintain the vitality of these communities. A number of site allocations are proposed to ensure identified needs are met. Further allocations may be made through Neighbourhood Plans."*

The WOLP 2031 Local Plan identifies the Carterton sub area as a growth point and this sub area includes a number of villages as well as the town itself. In the Carterton sub area growth in the plan anticipated that 2,680 homes including windfall sites will be completed by 2031 and of this total Brize Norton parish has already allocated and committed to 700 homes at Brize Meadow. There are a further 99 homes on Brize Meadow and 16 additional houses within the village which are classed as windfall. No other sites are identified in the Local Plan within the parish of Brize Norton and windfall sites across the sub area are expected to deliver c 238 by 2031. Thus the Brize Meadow (799 homes) scheme has made the greatest single contribution to the sub area's growth and falls within Brize Norton parish. It would now seem entirely reasonable that little or no growth is considered within Brize Norton within the Local Plan period to 2031.

As a consequence the BNNP does not identify or allocate potential sites for development.

The National Planning Policy Framework has recently been revised in December 2024 and amongst other matters has sought to increase new housing targets on a mandatory basis and it is understood that West Oxfordshire housing targets will increase providing greater housing supply by 2041. However, this will impact on the 5-year housing land supply position in the district.

West Oxfordshire Design Guide

Response: BNPC will also insert text to the sub section on the West Oxfordshire Design Guide, as follows:

The West Oxfordshire Design Guide, adopted in 2016, is a Supplementary Planning Document. It provides useful information about local character and is referenced in the Brize Norton Design Code. It provides details regarding settlement type including linear and dispersed settlements like Brize Norton and their characteristics.

Section 5.4 of the Guide sets out information on the pattern of each settlement defining Brize Norton as an Open Wolds type settlement in an open exposed setting with a loose knit form with a number of dispersed farms. It notes that open land is also a key component within dispersed settlements. Later infill can give a previously dispersed settlement a less gappy, and more nucleated form, and result in loss of character.

Oxfordshire Minerals and Waste Plan.

Response : BNPC agrees to adopt OCC wording on their Minerals and Waste Programme.

Development Context

The wording here is directly taken from the 2031 Local Plan. BNPC agree to add that the future need for and suitability of sites for more development will be assessed through the emerging WOLP2041.

Housing Development and Allocations

Response: Paragraph 4.22 of the WOLP 2031 states that, *"Beyond the rural service centres, some development will be supported in the villages, but this will be limited to that which respects the village character and local distinctiveness and would help maintain the vitality of the local community."*

As it does not refer to housing need to be demonstrated so BNPC agrees to remove the words *"local housing needs"* from the text. It should be noted the reference to meeting local housing needs is not included in the policies of the Neighbourhood Plan.

Part 5 Our Sustainability Challenges

The SWOT analysis is at Appendix 18 AND which underpins the themes that were developed in the Neighbourhood Plan.

Sections 5.1.2 and 5.1.3

Response: BNPPC considers the title of 5.1.2 could be amended to Active Travel. In Section 5.1.3 text could be added to reference more crossing points, laybys, and so forth in the village itself.

Section 5.2.3

Response: The aspiration for a Conservation Area can be supported with respect to the listed buildings, structures, features and roadways and the Neighbourhood Plan recognizes the various clusters of heritage assets that contribute to character.

Section 5.3

Response: BNPC agrees that appropriate text can be inserted into policy CF1.

Part 6 Neighbourhood Plan and Vision

Response: BNPC agrees that the Section 6.1 Vision Statement on page 35 of the Draft BNNP should be strengthened by adding text as follows:

“The three key pillars underpinning the Vision and Objectives are:

- *sustaining and enhancing the distinctive character and identity of the village and its heritage, notably the established dispersed settlement pattern*
- *protecting the Open Wolds landscape especially its openness, and inter-visibility and key green spaces and green corridors as shown on Map Ref 07,*
- *and to sustain and enhance the community infrastructure serving the community. “*

In particular the value of the green spaces to supporting active recreation, and for biodiversity is especially important when considering the functionality of green corridors. The RAF base is a very dominant feature which abuts the settlement and with Carterton’s growth pressing upon the settlement sustainable development in the Brize Norton context depends upon respecting the three main pillars. Development that threatens the integrity of the parish and the settlement pattern with say weak design guidance and/or car-based settlement patterns resulting in more nucleated patterns (see West Oxfordshire Design Guide and Brize Norton Design Code) should not be considered as delivering sustainable development at Brize Norton.

Part 7 Policies

CLH1 Landscape Character

Response: Noted. Clarification has been provided to the Examiner that addresses the selection of views .

CLH2 Key Local Views

Response: Noted. Clarification has been provided to the Examiner that addresses the selection of views .

CLH3 Strategic Buffer Zones and Settlement Areas Policy

Response: A detailed explanation has been provided to the Examiner which is repeated below as follows:

The potential risks to the character and identity of the parish arising from potential coalescence stems from the West Oxfordshire Local Plan 2031, policy OS2. At the Reg 14 stage of the BNNP discussions were held with WODC about this policy and one of the areas designated was agreed to be changed to an Area of Sensitivity to Change as it is in fact could not be supportable solely on the grounds of potential coalescence. No other changes to the Strategic Buffer Zones were proposed at that time. *It is agreed that the effects of the policy on these two designations is indeed similar.* For example, while it is important to protect the setting and character of the village from urban effects in both these designations (such as not permitting street lighting) preventing potential coalescence is a more effective tool in the first instance.

Whilst WODC now appear concerned about the use of the term Buffer Zone, this is in existence in the made Hailey NP. This has a policy about Buffer Zones (E3) that relates to small local gaps between Hailey and other local places. This contrasts with Brize Norton where the risk of coalescence is very pronounced from Carterton which abuts Brize Norton not in a single location but extending alongside this linear dispersed settlement over a significant distance. The scale of this and its unique characteristics and potential impacts led to the term Strategic Buffer Zone being selected.

The Local Plan also used wording to protect or enhance the local landscape and setting of settlements. Policy CA5 in the Local Plan states policy should enhance and extend the green buffer on the northern edge of Carterton including between Carterton and Brize Norton village as well as protection and enhancement of the character and setting of Carterton and the identity of neighbouring villages.

Policy over the last years has provided a green corridor between Carterton and Brize Norton, setting a limit to Carterton's growth in this direction. Yet though Brize Meadow has allowed Carterton to grow into Brize Norton (799 homes) parish, the green corridor has been maintained.

In many respects even more areas might be termed *Areas of Sensitivity to Change*, bearing in mind the current challenges. Some of the principles in the policy could apply to future coalescence threats arising in the rural areas of the parish but these cannot be anticipated or delineated at this point. This makes holding the line against existing coalescence risk even more important.

However this policy tries to be more specific about coalescence between Brize Norton and Carterton and Brize Norton and the RAF base which are able to be delineated. It also applies to the sub areas within the village which are distinct. These areas are "Strategic" in nature in that their loss to development would dramatically increase coalescence, set a precedent for incursion into the countryside and undermine the character and identity of Brize Norton. Indeed, these buffer zones arguably have a special character as befits a Domesday Book era settlement with listed buildings, historic pathways and roads, materials and appearance.

The recent development of Brize Meadow in proximity with a tranquil sub area around Burford Road shows what impact coalescence can have, and this recent history places a great responsibility on the Neighbourhood Plan to avoid this in the future.

In Hailey Neighbourhood Plan policy E3 refers to Buffer Zones which apply to very small specific areas where say a small distance separates the existing villages. This is a different situation to Brize Norton where a strategic corridor has separated the village along its entire interface with Carterton and where any breach would potentially join it to the town.

Concerning the Criteria for CLH3 BNPC response is as follows, communicated also to Examiner:

Criterion (i) Do not support this suggested change.

Criterion (iii) Do not support this suggested change. Urban street lighting would undermine the character of the village and especially within the Area of Sensitivity to Change where the function, appearance and character of the Country Park and its setting would be significantly impacted.

Criterion (iv) Do not support this change as it would open the door to development north of the Country Park within its own setting. The existing Local Plan uses wording about incursion into the countryside see above.

Criterion (v) BNPC suggests that deleting the last sentence of the policy will be sufficient.

Criterion (vi) This is agreed.

Criterion (vii) Agree to amend partly as follows: "...trees should also be retained where possible and enhanced."

Criterion (viii) Disagree as this will weaken the policy.

Criterion (ix) Agree to reword this along lines of policy OS2 in WOLP 2031 which concerns loss of important open space and features but also to add in words about adjoining development that might impact upon its setting i.e. overlooking, overshadowing, visual appearance and so forth.

Criterion (x) Agree.

CLH4 Village Character and Design

Response: BNPC agree the last bullet in the policy should be deleted as it is replicated more appropriately in SD1.

In addition, the supporting text should add that new development should be of high-quality design as set out in the Brize Norton Design Code including use of traditional design features and materials including lintels, dormers, and offering views over open land to the rear of properties.

CLH5 Heritage Assets

Response: BNPC agrees that (i) should be introductory text within the policy.

BNPC agrees (ii) should be part of the supporting rationale.

BNPC proposes a new paragraph in the rationale that explains some examples of heritage characteristics as follows:

Brize Norton is historically a stone-built settlement with slate roofs. Boundary walls of Cornbrash stone topped with "cocks and hens" slates are common in the settlement's cottages whilst the more important buildings such as the Manor House have very high stone boundary walls providing privacy from the road. Building heights are generally low with Oxford Red Chimneys, dormer windows with lintels and other traditional construction features.

BNPC proposes to add another line in the policy that states "*Heritage characteristics such as stone boundary walls, grass verges, Stonesfield roofing slates, Oxford Red Chimneys, dormer windows with stone will need to be included in design and layout of new developments.*"

ENV1 Local Green Spaces

Response: LGS3 the Thames water SUDS area forms a public open space and is used accordingly. LGS4 as a key open space and Country Park is protected by policy EH5 of the WOLP 2031. However, bearing in mind its adjacency to the Area of Sensitivity to Change which is not designated in the WOLP 2031 it was deemed that more protection should be offered under LGS provisions to the Country Park with scope to potentially extend it in the future as it is currently a rather narrow corridor within visibility of adjoining housing. This is also because the setting of the Country Park could be added to the Country Park in the future either wholly or in part to strengthen the Country Park's role for recreation, biodiversity and as part of a green corridor.

CF1 Community Facilities and Infrastructure

Response: The following has been communicated to the Examiner which also addresses the points raised by WODC.

WODC advise that the context for this policy is policy OS5 in the WOLP 2031. Although there is no CIL in place, currently WODC also helpfully suggest that home working is an area that could be given more weight in this policy.

Therefore BNPC is agreeable to extra text being inserted as follows in the rationale on page 33:

"Reference should be made to the Council's Developer Contributions Supplementary Planning Document (SPD) which sets out guidance for likely infrastructure requirements. In addition the support for homeworking in the village can be aided through extra infrastructure being provided. The village has seen some investment in super-fast infrastructure (FTTP) in recent years so development should enable connectivity to be enhanced and where a larger scheme is proposed community hub provision including scope for SME use and/or self-employed or extra investment in Elder Bank Hall extension and the new Pavilion."

BNPC propose to add a line to policy as follows to criterion (ii):

"Particular effort should be made to enhance facilities in new homes and or community facilities to enable home or community hub working and these requirements should be reflected in any development proposals; they may include further contributions to Elder Bank Hall Extension or the New Pavilion. In addition regard should also be given to WODC's Developer Contributions SPD in working up development proposals."

It is worth noting that stewardship provisions are increasingly required for larger developments, and this is often referenced in planning policy.

SD1 Sustainable Development Policy

Response: WODC comments that SD1 seeks to articulate what sustainable development means in the context of Brize Norton. The policy intentionally covers a range of matters in a simple format recognizing they may be relevant wholly or in part in terms of impacts of development.

The first bullet considers flood risk. It is agreed SD1 is compliant with policy EH7 in WOLP 2031, but the parish has specific issues with flooding and surface water discharges from surrounding development. It is important that any new development that cumulatively impacts the local situation should ensure necessary investment in on-site and off-site SUDS and other flood meadow storage management tools. It should be noted that Kilkenny Country Park setting functions in part as a flood attenuation areas. BNPC agrees to add text as follows to the end of the policy bullet:

..." implement sustainable urban drainage systems to minimize flood risk."

The second bullet is also important to retain as Brize Norton has particular problems and though policy OS4 in WOLP 2031 is relevant there is no evidence that it has been successfully applied to new development in the area.

Bullets (iii) and (iv) concerns habitat and biodiversity. The biodiversity net gain issue is very important, and this policy should enable on-site measures in the specific circumstances of Brize Norton and allow for off-site measures in the parish where this is not achievable. There may even be scope for alternative natural green space to be provided within the parish to offset impacts of development on important natural designations beyond the boundaries of the parish.

The fifth bullet supports the effort to engender more active travel. BNPC needs to develop its own distinctive local solutions to protect character and setting.

The seventh bullet concerns climate related issues and how these could be addressed. It is the only policy that focuses on this issue in the Neighbourhood Plan. It is a comprehensive policy, and this bullet should be split into two parts, the second part starting after the first sentence, in order to achieve net zero in the built environment, and should read as follows:

“Net zero operational carbon should be achievable on site through ultra-low energy fabric specification, low carbon technologies and on-site renewable energy generation. Embodied carbon should be minimized where possible and demolition should re-use materials where possible. Developments should maximise opportunities to retrofit existing buildings where these are incorporated into schemes, in particular retrofitting of designated and non-designated heritage assets will be encouraged.”

It also mentions *diversification of farmland* in the sense that where there is development this may enable some new green spaces, retention and use of soils, biodiversity enhancement as well as woodland enhancement on site or off site possibly in association with screening in a very open landscape. BNPC agrees with WODC suggestion for change in wording as follows:

(vii) Encourage diversification of farmland to deliver habitat enhancements, especially in Nature Recovery Areas, Natural Flood Management areas and utilizing farmland in the northern and eastern parts of the parish.

Responses to suggestions by WODC Officers in their Appendix 1.

1. There is discussion about listed buildings, and it is noted that Historic England list should be referenced in the text.
2. The wording of the first bullet of policy CLH5 is agreed to be amended as follows:
 - (i) Brize Norton’s designated heritage assets and their setting and key views will be conserved and enhanced for their significance and important contribution to local distinctiveness, character, and sense of place (Appendix 06, Document B Heritage Assets).
3. WODC proposes that the wording of the fourth bullet of policy CLH5 should also be amended.
4. BNPC have advised the Examiner that it is acceptable to move the criterion into the supporting rationale.

However, WODC proposed wording suggests this should have some weight in policy and if agreed BNPC would be content for this to be retained in the policy, amended as follows:

“The historic landscape character/historic settlement pattern of Brize Norton, the route of former Roman roads and the deserted medieval villages of Astrop and Caswell will be conserved and enhanced for their significance and important contribution to local distinctiveness, character and sense of place (Appendix 06 Document B Heritage Assets) as set out in the National Planning Policy Framework 2024.”

END OF RESPONSES.

18.02.2025

“

COMMENTS ON REPRESENTATIONS MADE BY SAVILLS/BLOOR HOMES, NEXUS/LONESTAR, AND BLOOMBRIDGE.

Comments made by Bloor Homes / Savills (Land in the north of the Parish)

Brize Norton Parish Council has had a good working relationship Bloor Homes / Savills since 2018 when Brize Meadow development (which was named by the community) commenced. The PC has a vested interest in this development because all of the green spaces in and around it will be transferred to the PC along with a commuted sum for the ongoing maintenance in perpetuity. Because of this, the PC has taken an active interaction with Bloor Homes since commencement of works.

This good working relationship also led to Bloor Homes supporting our request for an additional £310,000.00 in S106 funds when they were applying for a further 99 homes on the development. This was because more land in the settlement area became available due to an increase in housing density.

BNPC are pleased that Savills have only recommended minor changes to the NDP, predominately accuracy of direction arrows indicating the key views and the difference in 'Area of Sensitivity' between two maps within Policy CLH3. With the examiner's permission, BNPC have aligned both maps as recommended.

The only other comment relates to Policy CLH3 referring to achieving a minimum biodiversity net gain of 10% and that the NDP should indicate the mechanism of how to achieve this.

BNPC would suggest that it is not the responsibility of the NDP to define how the 10% net gain can be achieved but it should be carried out by Bloor Homes / Savills when applying for planning permission as it should be a consideration throughout the planning process. The proposed strategy for achieving the biodiversity gain objective and consideration of the Biodiversity Gain Hierarchy will inform the design of the proposals.

Comments made by Nexus / Lonestar (Land in the north east and east of the Parish)

BNPC and the NDP Steering Group were shocked at the extremely negative feedback received about the key views over the land that they represent on behalf of the land owners Astrop Farm Ltd. Nexus's consultants Zebra, consider that these fields have no intrinsic value and there is no rational for allocating them as Key Views. (Key Views A, B, C, D, and E, in NP Document, Policy CLH2)

These fields and views form the rural setting and character of Brize Norton and are important features for our community. (Community Survey Summary Part 2, Environment – the top most important green space to households was the '*Rural landscape with long open views to the north and east*', and Part 3, Character and Heritage – the top most important valuable village characteristic was the '*Setting in a rural landscape*').

The land owner, who not only farms the fields in question, is a proud member of our Community. He too was shocked by the approach taken by Nexus, and he instructed them to adopt a positive attitude to the objectives of the NDP and hence, the community.

After the last presentation by Nexus / Lonestar to the Local Plan Working Group on 30th January 2025, the director of each company apologised to Cllr Les Goble (Chairman BNPC and BNNP Steering Group) about their negative responses to our NDP and that they would issue a letter addressing this matter, a copy of which is below, and engage with BNPC and it's NDP in a far more positive manner.



LONE STAR LAND

Brize Norton Parish Council
18 Chichester Close
Brize Norton
Oxfordshire
OX18 3PD

31st January 2025

Sent via email

Dear Sirs,

Brize Norton Neighbourhood Plan - Comments by Lone Star Land.

With reference to our ongoing discussions regarding the emerging Neighbourhood Plan, I would like to confirm our commitment and desire to work collaboratively with the Neighbourhood Plan Group at the Parish Council. To that end, our recent discussions have resulted in a positive iteration of the masterplan that we are promoting through the West Oxfordshire Local Plan review.

You may recall, that we commented on the 'Key Views' in our response to the Regulation 14 version of the plan, but earlier discussions and subsequent revisions to our plans meant that a scheme could be developed that would respect many of those key views, particularly viewpoints A,B and C. Consequently, these viewpoints were not referred to in our Regulation 16 comments.

Continued positive dialogue regarding viewpoints D and E has resulted in another iteration to our masterplan that has achieved, we believe, your aim of respecting the important views D and E. On this basis, we would like to withdraw our comments made regarding these viewpoints in the Regulation 16 version of the Neighbourhood Plan.

We look forward to continuing to work together, should our proposals gain any traction with the District Council. I would just like add that we acknowledge the hard work and effort undertaken by Les Goble and his team in producing this Neighbourhood Plan and wish you and the community every success in achieving a 'made' Plan.

Yours faithfully,

Reuben Bellamy BA(Hons) MA MRTPI
Planning Director
Lone Star Land Ltd

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With reference to the key views on land represented by Nexus/Lonestar, they have now recognised and identified them on slide 5 in their presentation to the Local Plan Working Group.

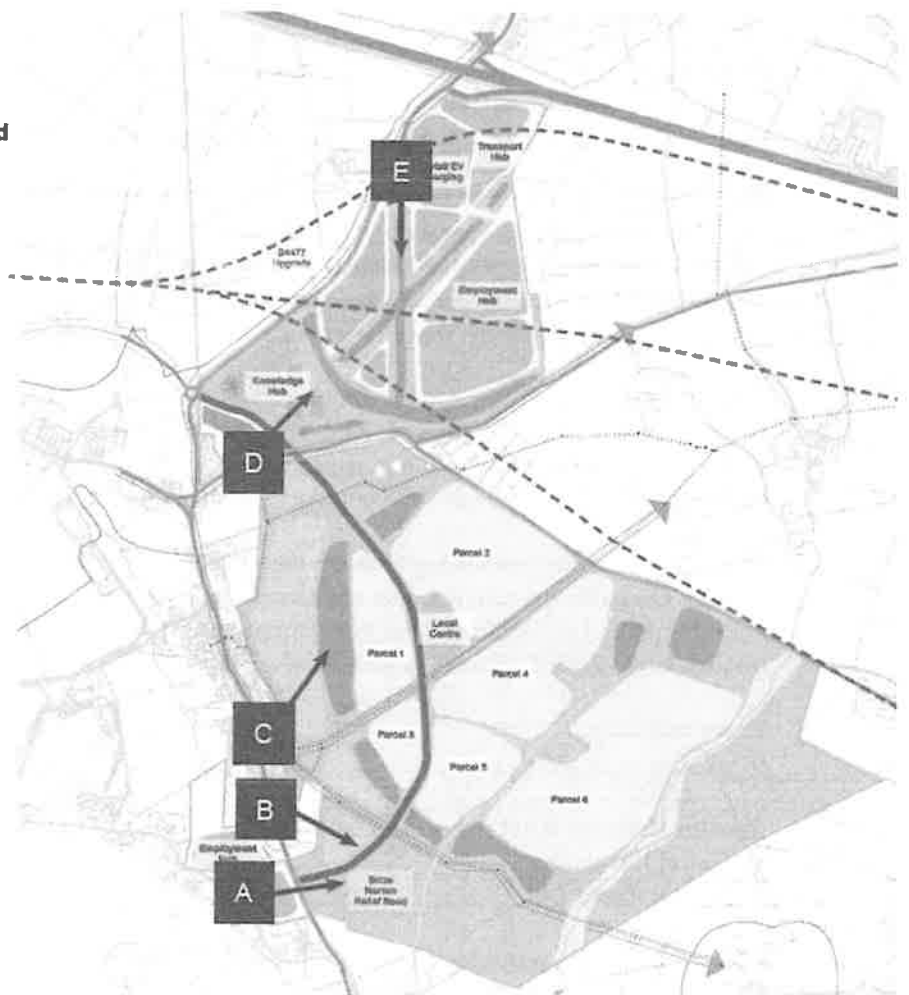
As can be seen below, views A and C will be mitigated by trees which separate the proposed development from the fields which run down the east side of the village. It is the intention of the land owner that these fields will be given to BNPC. View B towards Lew Hill will not be affected apart from the relief road which is the mid-distance. With regards to views D and E, when standing at a view point, a person has a panoramic view, not just a tunnel view. However, it would appear that Nexus / Lonestar are recognising these key views and are attempting to mitigate the visual impact by creating two green corridors through the employment area.

With regards to views D and E, when standing at a view point, a person has a panoramic view, not just a tunnel view. However, it would appear that Nexus / Lonestar are recognising these key views and are attempting to mitigate the visual impact by creating two green corridors through the employment area.

Concept Vision
Emerging Brize Norton Neighbourhood
Viewpoint Enhancement

Viewpoints A, B, C
Each of these viewpoints are looking from Brize Norton over the surrounding landscape. In order to mitigate the impact on these the development has been pushed as far east to retain views A and B free of development. Alongside this a new woodland will be planted to reduce the impact of the new development on viewpoint C.

Viewpoint E and D
Both viewpoint E and D have been pushed through the centre of the employment hub and therefore to retain the key views over the landscape, 2 green corridors will cut through the site creating 3 smaller employment hubs whilst retaining both key viewpoints over the landscape. Similarly the playing fields and new landscaping of the knowledge hub will further boost the protection of viewpoint D.



Slide 5 taken from the Nexus / Lonestar presentation.

We note that Nexus is also objecting to part of Buffer Zone A which is designed to prevent coalescence between RAF Brize Norton and the village of Brize Norton. The exact area they are disputing is also the entrance into the village. This area was subject to a speculative application for 42 houses approximately six years ago. Not only was there criticism from a WODC officer regarding the harmful impact at the village entrance, but the matter of how surface water would also be managed could not be solved so WODC issued a non-determination letter.

As detailed in Policy CLH3, paragraph 1,

Any proposal for development within the two proposed Strategic Buffer Zones A and B, identified between Brize Norton, RAF Brize Norton, and Carterton, (as shown in map ref:10) which either individually or cumulatively leads to unreasonable coalescence of Brize Norton to Carterton and which would cause a harmful impact on the character and rural setting of the village will not be accepted.

BNPC considers that the area of land being proposed for employment which lies between the RAF base and the historic entrance to the village, which has Grade II listed buildings each side, should be subject to this Policy.

Comments made by Bloombridge / Carter Jonas / Harper Crew (Land in the north west of the Parish)

Carter Jonas has three main concerns about the proposed Brize Norton NDP as follows:

- 1) Lack of reference to the Local Plan 2041
- 2) Representations and role of local Key View Points
- 3) Justification for the 'Area of Sensitivity' applied to Kilkenny Farm.

Referring to item 1), Carter Jonas imply that the Local Plan 2041 will be submitted in June 2025 and will therefore carry weight in planning matters. BNPC acknowledges that there is a new Local Plan in progress but at the time of writing both the Reg 14 and Reg 16 consultations, this plan didn't, and still doesn't, exist. The latest update we have regarding Local Plan 2041, is that the consultation will now take place in summer 2025, inspection will be in early 2026 with adoption in late 2026. BNPC would suggest that the new Local Plan will not carry any weight until after the examination and WODC has made any required changes that may be required.

As acknowledged to the examiner of our NDP, BNPC will undertake a review of the Plan (if necessary) once the emerging Local Plan Review has been adopted.

Referring to item 2), Carter Jonas has questioned representations and role of local Key View Points.

The fields and key views over the land they represent (Key Views G, and H) form the rural setting and character of Brize Norton and are important features for our community. (Community Survey Summary Part 2, Environment – the top most important green space to households was the '*Rural landscape with long open views to the north and east*', and Part 3, Character and Heritage – the top most important valuable village characteristic was the '*Setting in a rural landscape*').

(It should be noted that Nexus / Lonestar have now acknowledge and accepted the importance of the key views over the land they represent i.e. Key Views A, B, C, D, and E).

Referring to item 3), Carter Jonas has questioned the 'Area of Sensitivity to Change' (Key View I) which is within the land ownership of Kilkenny Farm.

As detailed in our document 'Overview of Planning Matters in the Parish of Brize Norton and Interactions with Savills / Bloor Homes, Nexus / Lonestar, and Bloombridge', the latter Land Agent is promoting the construction of 350 homes on the land owned by Kilkenny Farm with a further 350 homes planned in Phase 2.

Referring to our Landscape Character Assessment, Appendix 08, Area 3 – Country Park and its Setting', it states:

'At a local level, this area has its own identity and character which is informed by the experiential quality and communal values attached to its use as a country park, including its proposed extension (this is now called the Mary Ellis Country Park which is on the north side of Brize Meadow), and its immediate setting'.

The management recommendations section indicates that '*Views from the country park to the agricultural hinterland should be protected*'.

In the Reg 14 consultation document, BNPC identified this area as a 'Buffer Zone' because this is the same terminology as used by WODC in their Policy CA5, Carterton sub-area strategy, which states:

Proposals for development in the sub-areas should be consistent with the strategy which includes maintaining, enhancing and extending the green buffer on the northern edge of Carterton including between Carterton and Brize Norton village.

Policy CA5 goes on to state that:

Protection and enhancement of the character and setting of Carterton and the identity of neighbouring villages.

Please note that the northern edge of this proposed buffer zone is the furthest site line from the public art installation at the eastern end of the country park, and from Kilkenny Lane at the western end.

Feedback from WODC to the Reg 14 consultation requested that we change the description of this particular area to 'Area of Sensitivity to Change'. However, BNPC agrees with the examiner that all of the open green fields to the north west, north, north east, east and south west are Areas of Sensitivity to Change.

Now that BNPC has an understanding of the extent of the proposed development by Savills / Bloor Homes on the north side of Burford Road, BNPC considers that the term 'Buffer Zone' is more applicable to this land area.

We note that there are two responses from the landowner, Mrs Shipway.

In her first response dated 25th October 2024, she states that:

'A great deal of the area suggested for this marking is not even visualised from the country park'.

This is factually incorrect because all of the land identified is visible from the country park. This was acknowledged by the Landscape Consultant at the public consultation who stated that it would be impossible to hide the proposed houses from the country park which is why Bloombridge were placing a great emphasis on the quality of their houses.

In her second response dated 17th November 2024, she states:

'This area covers our home, businesses, farm buildings and impacts on our day-to-day operations of the farm now and into the future. It is not based on evidence and seems to have been drawn up by villagers who understandably want to keep their visual enjoyment of the area without considering the practicalities of our livelihood and indeed those of future generations on our farm'.

BNPC fails to understand how by allocating the term 'Area of sensitivity to Change' to the land area in question can impact the day-to-day operation of the farm business. By using this term, there is no change to the land usage. However, by building 350 houses (Phase 1) on the land will completely have a negative impact on the day-to-day operation of the farm.

With regards to the question of evidence, the original Community Consultation took place in 2018, and the evidence provided by that consultation informs that:

The fields and views form the rural setting and character of Brize Norton and are important features for our community. (Community Survey Summary Part 2, Environment – the top most important green space to households was the '*Rural landscape with long open views to the north and east*', and Part 3, Character and Heritage – the top most important valuable village characteristic was the '*Setting in a rural landscape*').

This evidence was used in formulating Policy CLH2 which was incorporated into the Reg 14 public consultation in 2023 and the Reg 16 consultation in 2024.

BNPC considers that no matter how the land area is defined, views from the country park to the agricultural hinterland should be protected'. This is supported by WODC Policy CA5.