



# BRIZE NORTON NEIGHBOURHOOD PLAN

APPENDIX 30  
Version 1 - March 2024

## STATUTORY CONSULTEES RESPONSES TO THE REG 14 CONSULTATION

*"our village  
our community  
our future"*

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**Planning and Strategic Housing**

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21st September 2023

Dear Sir/Madam,

**Draft Brize Norton Neighbourhood Plan – Regulation 14 consultation**

Thank you for the opportunity to comment on the draft Brize Norton Neighbourhood Plan Regulation 14 consultation.

We welcome the progress that is being made and having reviewed the plan, we remain of the overall view that it is well structured and presented, using images and photographs to make it interesting and visually pleasing. In addition, there is a succinct number of policies which are clearly focused on a number of issues of importance to the local community. As a general observation, we note that there are a number of incomplete sentences and typos throughout the document which could usefully be remedied when the plan is taken forward to the next stage of preparation.

The comments of the Council's Planning Policy team are outlined below. For ease of reference, these are set out in the same order as the plan itself. You will note that where relevant we have raised some potential concerns and suggested some possible changes which we hope you find helpful. You will also note that at the end of this response are a number of comments received from other departments and officers within the District Council. Again, we hope you find these helpful in taking the draft plan forward.

***Part 1. INTRODUCTION***

The introduction is considered to be clear and concise, setting out how the Neighbourhood Plan fits in with the wider planning framework. It may be useful to include a brief timeline or diagram summarising how this stage has been reached as well as the anticipated timetable to adoption.

## ***Part 2. THE BRIZE NORTON NEIGHBOURHOOD PLAN***

This section is considered to provide a good overview of the evolution and development of the Brize Norton Neighbourhood Plan to date. Here are some specific comments which may help to improve this section further:

- Section '2.2. Designation'. This could provide a sentence to explain why this is the most logical designation.
- Section '2.3. Community engagement', this could provide a bit more detail regarding the steering group formation and a brief description of the consultation to date including the key issues raised by respondents.
- Section '2.4. Draft Plan Creation', this could explain how the key issues affecting the village were identified which then fed into a draft vision and objections, from which the policies were shaped.
- Section '2.5. Relationship between plan objectives and Strategic Environmental Assessment Objectives/ Sustainability Appraisal'. Could this provide some information as to when the document will be screened and how this will feed into the next iteration of the plan for those readers who are unfamiliar with the process and requirements?

As mentioned above in relation to Part 1, a diagram may be helpful to succinctly summarise the process followed to this point and the timescales involved.

## ***Part 3. THE PARISH OF BRIZE NORTON***

This section provides lots of interesting facts about the village and provides a good understanding of its growth. Some minor observations are set out below.

Within Section 3.1 – Location and Context, the document references the fact that Brize Norton is classified as a linear and dispersed village. The source of this (presumably the West Oxfordshire Design Guide 2016) could usefully be referenced and perhaps a clearer map included to illustrate this fact.

Also, I would suggest that this section could perhaps be augmented to provide some overarching facts about the broader location of Brize Norton in the context of Oxfordshire and its current population etc. The document references the fact that Brize Norton is defined as a village in the adopted Local Plan but could perhaps be expanded to reference the District Council's 2016 settlement sustainability report which ranks villages in terms of their available services and facilities. Given the influence and size of RAF Brize Norton, I would advise that this is also mentioned within this section.

I note the reference to the parish falling within a locally designated area of high landscape value. It would be helpful if the source of this designation could be included as a footnote or within the main text itself – particularly as it is not a statutory designation of the Local Plan.

## ***Part 4. PLANNING AND DEVELOPMENT CONTEXT***

This section provides a useful overview of the wider planning and development context, the following suggestions are made to help ensure this is clear and concise:

### ***Planning Context***

- Given that the West Oxfordshire Local Plan has more relevance than the Minerals and Waste Local Plan, I would suggest that this is listed first. Where reference is made to the Minerals and Waste Local Plan, it would be advisable to check with Oxfordshire Council to ensure that the text reflects their current programme of work.
- In terms of the West Oxfordshire Local Plan 2031, I would suggest that a brief introduction of the role and status of the plan are included here along with the date of adoption. It may also be helpful to mention that because the Local Plan is now 5-years old, the District Council has commenced a review. It might also be useful to make some brief reference to relevant national policy in the National Planning Policy Framework (NPPF) and other relevant guidance.
- I note that many of the policies within the West Oxfordshire Local Plan 2031 are listed in full making this quite lengthy, perhaps this should be condensed to focus on the key policies as some are not as directly relevant as others. One option might be to have a separate Appendix listing out the wording of the Local Plan policies in full with the main text of the neighbourhood plan simply listing those policies which are of particular relevance and why.
- The West Oxfordshire Design Guide is listed here but it is a separate supplementary planning document (SPD) so it should be listed separately. As drafted, the text currently infers that it forms part of the Local Plan which is not the case. It should also be noted that the Design Guide SPD was adopted in 2016, not 2018.
- The WODC Design Guide provides some useful background context that could also usefully be referred to in more detail here. As an example, Section 4 provides some useful information about local character. Also, Section 5.1 of the Guide provides details regarding settlement type including linear and dispersed settlements and their characteristics and Section 5.4 sets out information on the pattern of each settlement, all of which could be referenced given the earlier reference to settlement type made in Section 3.1 of the Neighbourhood Plan.

#### *Development Context*

- It is not entirely clear what the purpose of this section is. I note the factual information about the number of existing dwellings and those with planning permission. It appears as if this is intended to explain why the neighbourhood plan does not propose to allocate any additional housing but could usefully be made clearer. There is no obligation for a neighbourhood plan to allocate sites and it may be easier to simply say that a decision has been made not to allocate sites but rather to introduce criteria-based policies against which development proposals will be considered alongside the provisions of the Local Plan.
- Within Sections 4.2 and 4.3, I would question whether it is appropriate to comment on whether there will be a future need for development within the Parish as this needs to be assessed through the emerging Local Plan 2041 and be evidence led.
- I also note that within Section 4.3 it states that 'limited infill' within Brize Norton village will be supported. This approach is more restrictive than Policy OS2 of the adopted Local Plan 2031 which states that villages (including Brize Norton) are suitable for 'limited development', not just infill. If the intention is to introduce a more restrictive approach, this would need to be set out in policy and considered as part of the examination of the neighbourhood plan.

## **Part 5. OUR SUSTAINABILITY CHALLENGES**

Firstly I note that some of the evidence gathered to support this, including consultation within the village now dates back six years and you may wish to consider if this needs refreshing given that the challenges and opportunities identified may have changed over the course of time.

Secondly, I believe this section could be restructured to make it easier to follow. At present, it presents a number of issues on a 'thematic' basis including the environment, green space and biodiversity, connectivity, social, economy and heritage etc.

It is understood that these are largely drawn from previous consultation and SWOT type analysis. However, the relevant challenges under each theme are not clearly identified and the plans which are included (e.g. community assets and 2022/2028 green spaces) are not clearly explained.

Ideally, having read this section, it would be clear to the reader what the main issues facing Brize Norton Parish are to provide the relevant context for the rest of the plan. These are not clearly identified at present but appear to include:

- Protecting important green spaces and green corridors
- Encouraging wildlife and biodiversity
- Climate change including an increased risk of flooding
- The threat of future housing development
- Ensuring good levels of connectivity including to the open countryside
- Traffic, road-use and parking
- Out-commuting and a lack of opportunities for local job creation
- Protection and provision of community services and assets
- Protection of Parish character and heritage
- Protecting the rural setting and landscape of the village
- Coalescence with Carterton

It may be better to include a simple table which for each 'theme' or topic clearly identifies the strengths, weaknesses, opportunities and threats that have been identified and explains them with reference to relevant illustrations/maps/images etc.

I also have the following specific observations to make:

- The maps on p20 would benefit from some commentary to support this.
- Section 5.1.1 (Green Space and Biodiversity). This section is useful in setting out the green spaces that are considered to be of importance. It would be useful to understand if these have been identified predominantly because they are considered to be important for biodiversity or because they are considered to be important buffers to avoid the coalescence of Brize Norton with Carterton, as these form different purposes. This section could assist the reader by setting out in more detail why these areas are considered to be important/ need protection and what improvements could be made as well as how the nature trail links up with the existing areas of green spaces/ public rights of way.

- Sections 5.1.2 and 5.1.3 could be combined (or separated to consider active travel under one section and vehicular travel under another). Further commentary could be provided regarding some of the potential improvements and solutions.
- Section 5.3. (Economic) includes information on population growth which is very interesting but may be better placed in Section 3 of the Plan.
- Section 5.4 (Heritage) touches on a number of considerations including landscape character, the importance of setting and the historic character of the village and it could use these themes to help it to be structured in a clearer way. This section also makes reference to the desire to establish a Conservation Area but with no details as to the extent or what streetscapes merit this designation. Finally, I note that this section also mentions the issue of coalescence which is discussed in more detail below.

## ***Part 6. THE NEIGHBOURHOOD PLAN VISION, OBJECTIVES AND POLICIES***

Firstly, as a minor point, you may wish to remove ‘policies’ from the title of this section as these are dealt with in Section 7.

In terms of wording of the vision itself, this could reflect more strongly on the importance of community facilities, green spaces and village character so it relates more closely to the objectives which should flow from the vision. Also ‘sustainable’ is quite a broad phrase – perhaps it could reflect more clearly what is meant by this in the context of Brize Norton.

I note the Brize Norton Vision Map on p29 but there is no explanatory note or text provided to explain what the map is seeking to illustrate or achieve or how it links to the vision or objectives.

Also, are you satisfied that this reflects all the information of relevance such as key views, recent infrastructure improvements (either completed or committed) such as highway improvements and bus stops as well as valued community facilities?

In terms of the proposed objectives, I note these are set out on a thematic basis which is sensible. However, a number of the key sustainability challenges outlined in Section 5 are not reflected in the objectives. There is for example no mention of enhancing biodiversity or protecting and improving connectivity. There is also no mention of anything related to transport, despite traffic volumes, parking and road use having been identified as key challenges. There is also nothing about climate change, flood risk or local employment creation and out-commuting.

Of those objectives which have been identified, there may also be scope to define these further. For example, under the environment objective it states ‘to protect important green spaces from development’. Could this include some text about improving these spaces for residents and biodiversity and link this to improved connectivity through green corridors? As another example, under the ‘sustainable development’ objective, could this be refined to explain what the PC considers to be sustainable development (for example development that respects the character of the village and established pattern of development perhaps?). National planning policy is based on a presumption in favour of sustainable development. The role of the neighbourhood plan is to explain what that means in the context of Brize Norton Parish. Also, could this be expanded to consider design and development standards? Current national policy places a considerable emphasis on the importance of good design.

## **Part 7. POLICIES**

The draft plan includes 7 policies as follows:

- CLH1 – Landscape Character
- CLH2 – Key Local Views
- CLH3 – Strategic Buffer Zone between Brize Norton, RAF Brize Norton and Carterton
- CLH4 – Village Character and Design
- ENV1 – Local Green Spaces
- CF1 – Community Facilities and Infrastructure
- SD1 – Sustainable Development

As a general observation, it is very helpful for neighbourhood plans to include a limited number of policies such as this to ensure the plan is focused and simple to apply in a development management context. It is also helpful to clearly explain which overall objectives are intended to be delivered by which policy as is the case here.

Below I have provided some feedback regarding each of the 7 proposed policies. The commentary focuses in particular on the policy text but I have also provided some feedback on the supporting text.

### **Policy CLH1 – Landscape character**

Policy CLH1 focuses on landscape character and in summary seeks to ensure that proposals for new residential development:

- Retains and respects key views where practicable
- Does not adversely impact the character of the village
- Minimises light pollution
- Retains and enhances the key components of the rural landscape character of the parish (agricultural land use, open views, pattern of hedgerows etc.)
- Protects natural assets where possible;
- Are supported by suitable stewardship arrangements for the management and maintenance of green spaces

I note that there is a considerable degree of overlap with Policy EH2 (Landscape Character) of the West Oxfordshire Local Plan 2031, which requires new development to preserve and, where possible, enhance the intrinsic character, quality and distinctive natural and man-made features of the local landscape. Both policies address the issue of light pollution.

I have a number of observations regarding Policy CLH1 which I hope you find useful in refining it.

Firstly, I note that it is intended to apply only to residential development. This is in contrast to Local Plan Policy EH2 which applies to all forms of development. You may wish to consider whether the scope of Policy CLH1 needs to be broadened out to include non-residential uses.

I also note that unlike Local Plan Policy EH2, the policy refers to the protection of important views.



Firstly, this creates a degree of overlap/repetition with Policy CLH2 – Key Local Views (see further comments below).

Secondly, I have concerns that in making a cross-reference to a total of 34 key views which are identified in Appendix 09, that the policy is unduly restrictive, contrary to national and local policy.

Thirdly, as drafted, the policy states that any new development (presumably residential) beyond the settlement boundary should not adversely impact the character of the village and should minimise light pollution.

The West Oxfordshire Local Plan does not define specific settlement boundaries. It would appear that the intention of the neighbourhood plan is to define specific boundaries as set out in Appendix 24. I would question whether such an approach is in general accordance with the Local Plan. If this approach is pursued, I would imagine it will be an important consideration for any subsequent examination of the neighbourhood plan.

I also note that as currently drafted, the policy could be construed as meaning that any development within the proposed settlement boundary does not need to have regard to village character and light pollution. It may be safer to simply say all development should seek to minimise light pollution and avoid adversely impacting the character of the village – or words to those effect.

I note that under the second bullet point, the policy suggests that as a key component of the rural landscape, land in agricultural use should be retained. Again, I have concerns that this approach is overly restrictive and could effectively rule out any development which is proposed on agricultural land beyond the proposed settlement boundaries.

I would suggest that in terms of natural assets, the policy could be more ambitious and aim to ‘enhance’ these in line with the Local Plan. Finally, reference is made to ‘vintage’ trees whereas it should be ‘veteran’ trees.

Finally, I note the cross-reference to Policy CF1 in relation to the stewardship of future green spaces and would question whether this issue needs to be addressed in Policy CLH1. In short, is this unnecessary duplication with Policy CF1?

### **Policy CLH2 – Key Local Views**

Policy CLH2 identifies 10 key views (although I note that map ref: 026b identifies 12 image locations). As set out in the policy, the overall intention is to maintain and enhance these key views and protect them from development that would undermine their character and identity.

The supporting text provides some useful background information regarding the landscape features in the designated area, some areas of which are more closely related to Carterton than Brize Norton village in terms of proximity.

In terms of the policy itself, it is not entirely clear how the 10 key views which have been identified relate to the 34 key views identified at Appendix 09 and cross-referenced in Policy CLH1. There is clear overlap so presumably the 10 key views mentioned in the policy are a sub-set of the 34 from Appendix 09. This creates confusion and reinforces the fact that the issue of seeking to preserve key views should be dealt with in a single policy.

In more general terms, I have concerns that in seeking to identify such an extensive number of key views, the policy adopts an unduly restrictive approach. How would 'failing to protect' these key views be judged? Is it the case that any development proposal which has an impact upon them would be refused? Also what does 'will not generally be permitted' mean? Does this wording suggest that in some circumstances, permission will be granted despite development having an impact on the key views identified? The policy needs a greater degree of precision and I would suggest it is re-drafted.

It may for example be more appropriate to use words along the lines of *'all development proposals will be expected to have regard to the key views identified at Figure X and wherever possible should seek to maintain and enhance them'*.

### **Policy CLH3 – Strategic Buffer Zones and Settlement Areas**

Policy CLH3 is a lengthy policy that seeks to address a number of issues. In essence it seeks to identify a number of strategic buffer zones which will be protected from development in terms of their character and openness – the intention being to maintain the soft transition between Brize Norton, RAF Brize Norton, and Carterton, and preserve the setting of the village in its wider rural landscape.

The policy makes specific reference to local green spaces (with cross-reference to Policy CLH2 which should presumably should be Policy ENV1?).

It also makes specific reference to the maintenance and enhancement of all green corridors where possible – although it is not clear whether this is referring to green corridors within the identified strategic buffer zones or more generally across the parish.

In light of the above, I have several observations on this policy and how it could usefully be amended.

The first concern I have is that in seeking to identify specific buffer zones, the policy automatically suggests that the intention is to keep these free from development. In contrast, the West Oxfordshire Local Plan 2031 adopts a more general approach, with Policy OS2 seeking to ensure that development does not cause coalescence, avoids the loss of identity of separate settlements and protects or enhances the local landscape and setting of settlements.

Importantly, it does not seek to define specific buffer zones and I think it is unduly restrictive to do so.

My suggestion would therefore be to refer to these as 'areas of sensitivity to change' or something similar, potentially shown as a more general star or circle on the map – rather than having a specifically defined boundary. There is also a risk in defining a specific boundary that other areas beyond those boundaries are construed as not being sensitive to change.

The policy and supporting text could then explain that in the overall context of Policy OS2 of the Local Plan, the neighbourhood plan has identified 3 areas of particular sensitivity to future development in terms of preserving the character, identity and rural setting of the village and that any proposals within these locations will be carefully scrutinised and not permitted where they would cause demonstrable harm in terms of impact on the setting and character of the village.

I suggest that the reference to local green spaces is taken out from this policy and addressed solely in Policy ENV1.

I would also suggest that the issue of preserving and enhancing green corridors is potentially considered elsewhere or as a standalone policy as it doesn't appear to logically sit with the overall intention of this policy which relates primarily to protecting the character and setting of the village.

Perhaps the policy should also be re-titled to something along the lines of 'Protecting the setting and character of the village'. The policy could then explain that development proposals which would lead to unreasonable coalescence of Brize Norton with Carterton and cause a harmful impact on the character and rural setting of the village will not be accepted.

There may already be S106 agreements ensuring that Buffer Zone 'B' remains as open space in perpetuity as part of the allocated housing area under construction.

The policy states that within the strategic buffer zones, heritage assets and other features will be retained but should these be retained/ incorporated where possible outside of these areas?

Finally the policy makes reference to green spaces intertwined within the village and I would recommend that this is reworded to state that any development should safeguard the special qualities of these open spaces.

#### **Policy CLH4 - Village Character and Design**

Policy CLH4 essentially seeks to ensure that residential development proposals are well designed and protect and enhance the village's character and identity – in particular its distinct linear form.

The supporting text provides some useful background information regarding the pattern of development in Brize Norton. This could be further improved by providing more information regarding the different character areas and what makes them distinctive. The density map may not be necessary here but if it is retained, the text in the image needs to be sharpened so it can be clearly read.

In terms of the policy itself, I have a number of observations and suggested amendments.

Firstly, I note that the policy is intended to apply only to residential development (including extensions). Whilst the impact of new housing related development appears to be the principal concern of the neighbourhood plan, I would suggest a policy which seeks to ensure high quality design and protect the

character and identity of the village, should apply to all forms of development and not just residential schemes.

I note that the second bullet point refers to 'protecting the settlement boundary'. Is the intention to use this policy to resist any form of development beyond the proposed settlement boundaries? If so, I would suggest the policy is unduly restrictive and should be re-worded with a greater emphasis on development proposals respecting the distinctive linear form of the village.

The second bullet point also cross refers to the buffer areas identified on the western side of the village. My concerns on the principle of delineating buffer zones were set out previously in relation to Policy CLH2 and apply equally here.

The fourth bullet point refers to biodiversity gain. Whilst this is fine and consistent with the Local Plan, I wonder if the issue would be better addressed in a separate policy? This could be combined with the issue of green corridors which currently sits slightly out of place in Policy CLH3.

The last bullet point in this policy covers many separate issues and it would be helpful to separate these. The policy covers environmental health (noise, odour etc); is this the correct policy for these?

As a final general observation, I wonder if there are any further specific characteristics of the village which could be mentioned in the policy drawing from the design code work which has been carried out. This is the opportunity to clearly set out what is meant by high quality design in the context of Brize Norton and the policy should be as locally distinctive as possible.

### **Policy ENV1 – Local Green Spaces**

It is noted that Appendix 27 Local Green Spaces includes an assessment of the Local Green Spaces proposed in Policy ENV1 Local Green Spaces and in the introduction it states that:

*'The following pages provides evidence for each Local Green Space designation area using Cotswold Methodology proformas...'*

This should be modified to state that

'Cotswold District Council's 2014 'LOCAL GREEN SPACE DESIGNATION A TOOLKIT FOR LOCAL COMMUNITIES IN COTSWOLD DISTRICT' has provided a template for assessing Local Green Spaces. This has been modified for the purposes of assessing Local Green Spaces within Brize Norton.'

The template should then be corrected to recognise the fact that the assessment is for a Parish in West Oxfordshire thereby removing references which are only applicable to parishes in Cotswold District eg remove references to Cotswold District Council, Gloucestershire County Council, Gloucestershire Rural Community Council etc and replacing them with the equivalent for West Oxfordshire.

<https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space> advises that 'the qualifying body should contact landowners at an early stage about proposals to designate any part of their land as Local Green Space. Landowners will have opportunities to make representations in respect of proposals in a draft plan'.

Evidence that this contact has been made should be included in Appendix 27. It appears that the first contact is being made via this Regulation 14 draft consultation and indeed WODC Estates have advised that they have not been contacted previously about the inclusion of two WODC owned sites within the Local Green Spaces designation. At minimum, the Local Green Space assessment submitted at the Regulation 15 stage (eg formal submission for examination) should include evidence of all landowners being directly notified of the proposal to designate their land as Local Green Space and their written response to this. For example, the assessment states that Christchurch College is aware of the proposed designation of the allotments and supports it. The examiner would expect to have sight of written evidence of this support.

With regard to the two proposed Local Green Spaces in WODC ownership (Kilkenny Lane Country Park and Monahan Way Sports Pitches and Pavilion), the Council's Estates team response is included alongside the observations of other internal departments and is appended separately.

With regard to the Monahan Way Sports Pitches and Pavilion, the Pavilion itself is a built structure and so is not appropriate for Local Green Space designation. If it is the Parish Council's intention through the designation to protect the leisure and amenity use of this site, and not prohibit any future enhancement of community provision, then a more appropriate approach to achieving this would be to include an additional Policy (under Policy CF1 Community Facilities and Infrastructure'). This policy should strongly support proposals which further enhance the leisure and amenity use of the Monahan Way Sports Pitches and Pavilion and state that any development proposals that would result in the loss of this facility would *only* be supported where it can be clearly shown that an appropriate alternative provision of at least equivalent suitability and accessibility, particularly by foot, will remain.

Such a policy would be consistent with West Oxfordshire Local Plan 2031 policies:

Policy E5: Local Services and Community Facilities

Policy EH4: Public Realm and Green Infrastructure

Policy EH5: Sport, Recreation and Children's Play

Policy EH4 (Public realm and green infrastructure) of the West Oxfordshire Local Plan 2031 states that existing areas of public open space and green infrastructure will be protected and enhanced for their multifunctional role.

Many of the sites identified form important local green spaces and the aspiration of safeguarding from residential development is understood and supported. However, it should be recognised that appropriate development which supports the function of these spaces may be beneficial so it may be better to state that new development will be supported where it enhances the function/ appearance of these.

#### **POLICY CF1 – Community Facilities and Infrastructure**

The overall intention of Policy CF1 is to ensure that residential development is supported by the necessary infrastructure including arrangements for the management and maintenance of key assets.

In this respect it sits within the context of Local Plan Policy OS5 which requires all new development to deliver or contribute towards the timely provision of essential supporting infrastructure, either on-site or through a financial contribution.

The supporting text of the proposed policy could helpfully refer to the Council's Developer Contributions Supplementary Planning Document (SPD) which can be accessed [here](#). The SPD provides detailed guidance to developers, infrastructure providers and local communities on likely infrastructure requirements for developments in West Oxfordshire and contains useful information which can be used to guide this policy.

Please note that CIL is currently not in place in West Oxfordshire although we are working towards its progression. Further information regarding the progression of CIL can be accessed [here](#).

In terms of the policy itself, as a general observation I note that it is quite detailed and prescriptive making specific reference to the following:

- The provision of capital items of infrastructure
- Improving and enhancing existing community facilities/infrastructure
- Access arrangements linking Carterton Road to service infrastructure in sub-area
- The general terms of any long-term stewardship arrangements including specific reference to the use of endowments and commuted sums paid before permission is granted and covenants to be applied in perpetuity etc.

Whilst the intention of the policy is understood and supported, I do have concerns that it is too detailed and prescriptive.

In referring to improving and enhancing existing infrastructure, it should also be noted that the intention of developer contributions secured through S106 agreements is to mitigate the impact of proposed development – they are not intended to remedy existing deficiencies in provision.

You may therefore wish to consider re-wording the policy to reflect the following key points:

- All development taking place within the Parish will be expected to be supported by appropriate investment in supporting infrastructure – both on and off-site;
- The timing of provision should be carefully considered and for any major development should be clearly set out in an infrastructure delivery/phasing plan;
- Where the management and maintenance of any community assets is a relevant consideration, developers will be expected to propose appropriate long-term stewardship arrangements, the details of which will be secured through a Section 106 agreement or other suitable mechanism

## **Policy SD1 – Sustainable Development Policy**

National Policy (the NPPF) and the West Oxfordshire Local Plan are both based on a presumption in favour of sustainable development.

Policy SD1 seeks to articulate what sustainable development means in the context of Brize Norton which is helpful and appropriate.

However, I note that the policy covers a very wide range of issues and whilst all are related to sustainable development in its broadest sense, the topics are quite diverse and perhaps need to be broken down into separate policies or absorbed into other policies already listed. Specific observations on the policy as currently drafted are set out below.

Firstly I note that the policy only appears to relate to residential development (as is the case with a number of other policies). This should be broadened out to apply to all forms of development.

The first bullet point refers to avoiding flood risk. Whilst this is fine, I would question what it adds in terms of decision-making over and above the NPPF and the Local Plan both of which address this issue in some detail.

The second bullet point refers to water efficiency. I would observe that this is already addressed in the Local Plan through Policy OS4 – Prudent Use of Natural Resources so again question what value this is adding to the neighbourhood plan. The third bullet refers to the need to conserve ‘and’ enhance the historic environment but it may be more appropriate to state ‘and/or’ to provide some flexibility in accordance with Policy EH9 (Historic Environment) of the local Plan 2031. This may also be better placed within the Village Character policy?

The fourth bullet point requires a 20% biodiversity net gain. Whilst this approach is welcomed given the decline in habitats across the UK, given that this exceeds the mandatory minimum 10% national level, this will need to be supported by robust evidence to justify the need for a higher % in this particular area.

This may also benefit from being a standalone policy or incorporated within a policy regarding green spaces, green corridors and ecological improvement. Having a separate policy would also allow you to set out a clear approach towards off-site gains where on-site may not be achievable.

The fifth bullet point relating to accessibility does not make sense as currently worded and needs re-drafted. Effectively you are requiring development to be supported by a range of sustainable transport modes which could be more clearly set out.

We welcome the intention to apply net zero emissions bearing in mind that the UK government has made a commitment to net zero by 2050 and reducing emissions forms a key element in National Planning Policy. It is embedded in the Local Plan 2031 and the Council Plan which sets a target of reducing emission by 50% by 2030 (based on 2008 levels) and aims to set a pathway to achieving net-

zero growth by 2050. Anything more ambitious than this would need to be supported by robust evidence.

The requirement for EV charging points in new build development is now covered by the building regulations so there may be no need to include this within the policy.

I note the specific reference to the diversification of farmland to deliver more woodland but I am not clear how this will be achieved through new development which is unrelated to the areas mentioned in the policy.

I would also suggest that the final bullet is reworded such that major development assesses the impact on traffic flows and subsequent noise, pollution and disruption through the village both, during both construction and completion phase.

### ***Part 8. IMPLEMENTATION AND MONITORING***

I would suggest that the introductory text is expanded to talk about the importance of implementation and monitoring as this is an essential part of a strategy to ensure the policies are achieved. It also allows progress to be checked and can help inform if action needs to be taken or if plans need to be adapted.

The table starting on page 59 sets out a number of criteria to monitor the proposed policies. This would benefit from including a timescale column. Also some of the criteria could be expanded upon. For example under the delivery partners column - landowners, the County Council and the community could be added. In addition, the 'measures to be used to monitor progress' column should be expanded to include other relevant indicators other than just the assessment of applications. This could be a wide range of indicators and you may wish to review the indicators of the Local Plan Delivery and Monitoring Framework in Appendix 3 of the Local Plan 2031 to help assist you.

### **Other feedback**

Below I have set out comments received from other departments within the Council who were consulted on the Neighbourhood Plan and I trust these are helpful:

### ***Comments from the Climate Change Manager at West Oxfordshire District Council***

#### **Chapter 5**

- Would it be more logical to structure this as social, economic and environmental sustainability with subsections underneath these?

#### **Policy CLH4**

- Support retrofit of historic buildings, for example ASHPs and rooftop solar PV.

#### **Policy SD1**

- Policy could be strengthened in terms of net zero carbon in operation and embodied carbon for new build and retrofit. Happy to discuss this with the neighbourhood planning group.
- Refer to sustainable drainage systems as a way to minimise flooding risk.
- Support retrofit in historic buildings, in line with Policy CLH4.



- Consider other types of habitat for carbon sequestration, in addition to woodland. Offsetting should only be used to offset residual emissions after these have been minimised.
- Separate carbon offsetting from renewables, which link to net zero carbon.
- Include EVCPs as a separate point. Consult OCC EV team.

Implementation and monitoring

- More effective if KPIs are included alongside each policy rather than as a final section.

***Comments from Assets Manager at West Oxfordshire District Council (also see separate letter appended)***

We would respectfully object to the proposal to designate Monahan Way Pavillion and Pitches as Local Green Space as the Leisure requirement may change in the future and Council would want to have the ability to change the site in the future to respond to the needs to the community.

***Comments from Senior Conservation and Design Officer at West Oxfordshire District Council***

**Para 4.2** - The Design Guide was adopted in April 2016 not 2018

**General Suggestion:** There appears to be significant overlap / duplication with Policy CLH1- Landscape Character Policy, Policy CLH2 - Key Local Views Policy & Policy, Policy CLH3: Strategic Buffer Zones and Settlement Areas and, Policy CLH4 - Village Character and Design Rationale, with quite a negative perspective on the buffering / coalescence of the nearby villages.

I've concentrated my comments on CLH4 (below), but the NP may want to revisit / consolidate all 4 Policies so that they are more coherent and robust. Today's landscape, views, setting and built environment are largely the result of natural as well as (historic) human development, activity and interaction, and my concern is that if they are separated so definitely then we could lose the very essence of what we are trying to conserve and enhance. A blend of the natural and manmade environment could be looked at in greater detail. I recommend the NP refers to our heritage and landscape / environment policies e.g. LP policy EH13 – historic landscape character is an interesting policy relating to the historic landscape character including natural and built environment.

**POLICY CLH4 - VILLAGE CHARACTER AND DESIGN POLICY:**

**General Suggestion:** Using the wording: preserve and ~~or~~ enhance in line with the wording from the NPPF

**Suggestion** for the first paragraph: A bit of rewording to get the message across – especially re. Design:

*In addition to the other policies of the development plan, and in accordance with provisions in the Brize Norton Design Code, proposals for new residential development (including extensions) should be well-designed, seek to preserve and enhance the distinctive character and identity of the village notably its linear form and historic landscape character and will be supported provided that:*

N.B.: Instead of linear form they could use historic linear settlement pattern

**Suggestion:** In Bullet 1: this paragraph refers to the built form – suggestion to reword slightly and add a bit about high quality design instead of where it currently appears in Bullet 3 e.g.:

*They preserve and ~~or~~ enhance local character by respecting the local built form and pattern of development by way of their scale, density, height, landscape design, layout (including e.g. street and building layouts) and use of materials, making particular reference to the Brize Norton Character Assessment, the West Oxfordshire Design Guide, and the Brize Norton Design Code. N.B. High quality design should be an overarching standard in any new development.*

**Suggestion:** In Bullet 2: I wonder if the paragraph should be split?... Or... because the paragraph sounds quite negative with regard to avoiding coalescence / boundaries, I wonder whether this paragraph should be reworded?... something about respecting the boundary and historic linear settlement / pattern of historic development... LP EH13 may be useful here for wording. E.g.:

*They preserve and ~~or~~ enhance the distinctive character and identity of the village: it's historic linear settlement development pattern (and built form), it's setting in the wider rural landscape and it ~~protecting~~ respects the historic landscape character and settlement boundary. ~~(including on its eastern build line edges) and especially avoiding coalescence with Carterton including retention of the green spaces and buffers on the western side of the settlement.~~*

**Suggestion:** Bullet 3: this paragraph is a little awkward and includes two different aspects – it needs to be reworded slightly – and the reference to High quality design moved...so, something like:

*They protect the setting and key views into and out from heritage assets and, respect key features such as walls, verges, windows, roof-scapes, hedgerows, et al that significantly define the character of the area. ~~NB High quality design is achieved when it reflects specific localised conditions including notable suitable density~~*

**Suggestion:** Bullet 6: this paragraph is a little awkward and refers to two different aspects – perhaps it needs to be reworded slightly...something like:

~~They take care to prevent significant harm to and retain the heritage value of both designated and non-designated heritage assets; and that~~ They do not result in an adverse impacts to heritage assets and the general character of the area – including from noise, odour, air pollution and light pollution. ~~and they provide sufficient outdoor storage space for refuse, recycling and parking of cars and bicycles.~~

**Suggestion:** Perhaps this should be another Bullet point: e.g.:

- They should provide sufficient and well-designed outdoor storage space for refuse, recycling and parking of cars and bicycles.

## General

- Maps / figures need to be clearer – zooming in becomes pixelated and you cannot see the detail.
- Unfortunately we do not have the time / resource to go through the character area appraisals to check accuracy. With regard to mention of listed building – I would advise that the Link to Historic England 'The List' is included to their document so that buildings referred to in the NP documents can be checked:  
<https://historicengland.org.uk/listing/the-list/map-search/>

- Also, perhaps a N.B. to state - Any proposals / advice for heritage assets should come through the normal channels – i.e. via the Planning Conservation Teams – and / or via pre-application advice requests etc.

## **Summary**

In summary, we welcome the progress being made with the Brize Norton NDP which overall is a thorough and well-written document. However, there are a number of areas which need further attention and some revisions particularly regarding the proposed buffer zones and protection of key views as outlined in this response.

I trust this is of assistance and if you require any further assistance, please do not hesitate to contact me.

Yours sincerely,

Kim Hudson

Principal Planning Policy Officer

**Council Offices**

Woodgreen,  
WITNEY,  
Oxfordshire,  
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Tel: 01993 861000  
www.westoxon.gov.uk



WEST OXFORDSHIRE  
DISTRICT COUNCIL

Brize Norton Parish Council  
18 Chicester Place  
Brize Norton  
Oxfordshire  
OX18 3PD

18<sup>th</sup> September 2023

To whom this may concern

Re: Monahan Way Sports Pitches and Pavilion  
Kilkenny Lane Country Park

We would respectfully object to the proposal to designate Monahan Way Pavillion and Pitches as Local Green Space as the Leisure requirement may change in the future and Council would want to have the ability to change the site in the future to respond to the needs to the community.

Yours faithfully

A handwritten signature in black ink that reads "J McWilliams".

Jasmine McWilliams  
Assets Manager

**OXFORDSHIRE COUNTY COUNCIL'S RESPONSE TO THE FOLLOWING  
CONSULTATION:**

**District:** West Oxfordshire

**Consultation:** Brize Norton Neighbourhood Plan 2020 – 2031 (Pre-Submission Document)

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**Annexes to the report contain officer advice.**

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**Overall View of Oxfordshire County Council**

Oxfordshire County Council supports the ambition of Brize Norton Parish Council to prepare a neighbourhood plan and would like to thank the Parish Council for giving the County Council the opportunity to provide comments.

We hope you find our comments in the attached Annex helpful as you make amendments prior to submitting the plan. We would also advise that you review OCC's Neighbourhood Planning Guide (updated March 2021) which is available [here](#).

**Officer's Name:** Clare Bennett

**Officer's Title:** Planner

**Date:** 12<sup>th</sup> September 2023

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**ANNEX 1**  
**OFFICER ADVICE**

**District:** West Oxfordshire

**Consultation:** Brize Norton Neighbourhood Plan 2020 – 2031 (Pre-Submission Draft Document)

**Team:** Strategic Planning

**Date:** 12<sup>th</sup> September 2023

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## **Strategic Comments**

No sites are allocated in the Brize Norton Neighbourhood Plan; there is no specific requirement to do so in the West Oxfordshire Local Plan (WOLP). Brize Norton falls within the 'Villages' settlement hierarchy category of Policy OS2 (Locating development in the right places) of the WOLP. The Local Plan 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.

The County Council as Minerals and Waste Local Planning Authority wishes to point out Policy CLH2 (Key Local Views) seeks to protect areas in a Mineral Safeguarding Area. It is recommended the Neighbourhood Plan is amended in line with the service comments below as this could potentially conflict with the Council Council's policy M8 of the Minerals and Waste Local Plan Part 1 – Core Strategy (OMWCS).

Policy CLH3 – Strategic Buffer Zones and Settlement Areas and Policy ENV1 – Local Green Spaces designates some areas that fall within Highway land. OCC Highways Land takes precedent when any future highways works are required. The County Council therefore request the boundaries listed below are revised to exclude Highways land:

- Strategic Buffer Zone B
- Green Space 7 Mary Ellis Country Park – South
- Area 3 War Memorial

Annex 2 includes extracts from OCC's Map of Public Highways showing areas designated in the Neighbourhood Plan that are partly/fully within the maintained highway (they are within highway land and the County Council is the relevant Highway Authority). This information can also be found directly on the mapping tool on this webpage: [Map of streets we maintain | Oxfordshire County Council](#).

Where land has highway status, this takes legal precedence over the rights of the sub soil owner and no works can take place without the County Council's approval. The highway status of the land means that the public have the right to pass and re-pass over it and public utilities have the right to site equipment on or within it. It is unclear how any spaces designated through a Neighbourhood Plan could affect this, or the County Council's ability to carry out any highway works or improvements in the future and we would not want to fetter this ability in any way.

**OCC request the Parish Council does not publish the information contained in Annex 2 with the consultation documents.**

There are no specific comments on the Neighbourhood Plan in relation to transport strategy. However, the Neighbourhood Plan would benefit from reference to OCC's [Local Transport and Connectivity Plan](#), perhaps at bullet point 5 of Policy SD1 (Sustainable Development).

OCC's Archaeology Team advise that the Neighbourhood Plan should include a policy on the conservation and enhancement of the historic environment.

Further consideration within the Plan should be given to digital connectivity.

Detailed officer comments are included below.



**District:** West Oxfordshire

**Consultation:** Brize Norton Neighbourhood Plan 2020 – 2031 (Pre-Submission Document)

**Team:** Minerals and Waste Policy

**Officer's Name:** Enya Dale

**Officer's Title:** Planning Assistant

**Date:** 01/09/2023

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## **Minerals & Waste Comments**

The north of the Brize Norton neighbourhood designation falls upon a Mineral Safeguarding Area (MSA). Although the designations set out in Policy CLH1 (Landscape Character containing designations A-H) does not fall in the MSA, Policy CLH2 does designate areas in the MSA. Views Q, P and O do fall on the MSA. It is requested that this Neighbourhood Plan does not include these views/areas to be protected as this could potentially hinder and prevent this mineral being worked in the future contrary to Policy M8 of the [Minerals and Waste Local Plan Part 1 – Core Strategy](#) (OMWCS).

**District:** West Oxfordshire

**Consultation:** Brize Norton Neighbourhood Plan 2020 – 2031 (Pre-Submission Document)

**Team:** OCC Property

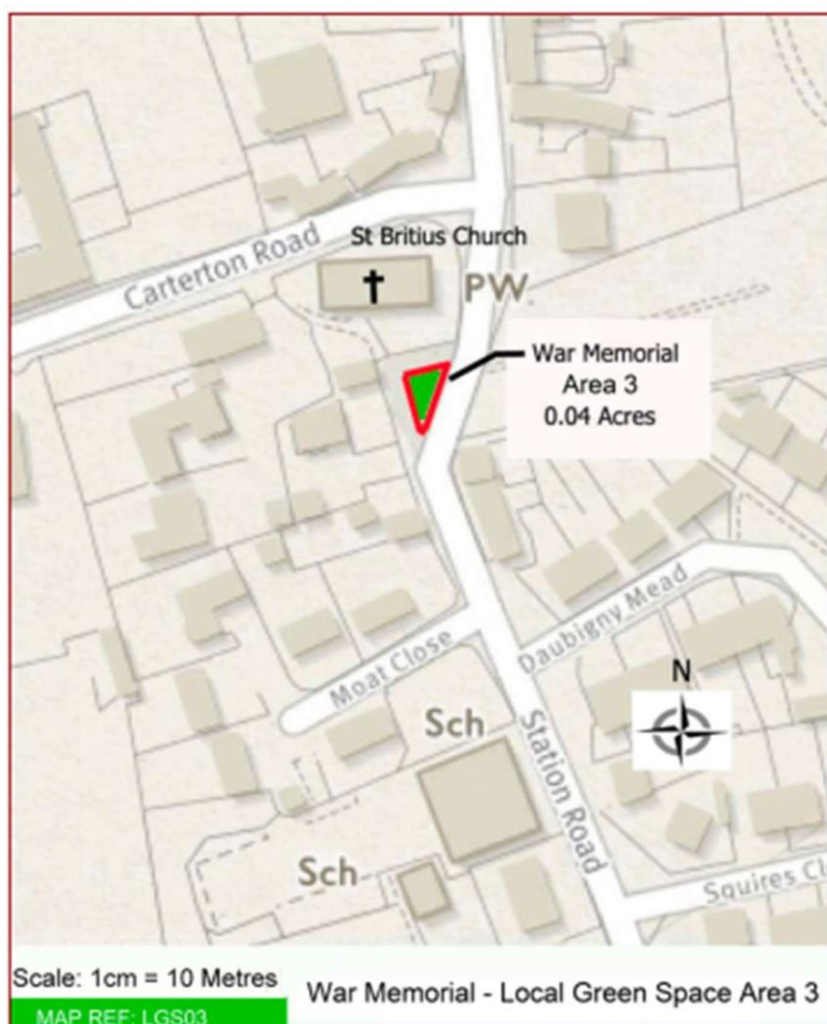
**Date:** 31/08/2023

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## Property Comments

### Policy ENV1: LOCAL GREEN SPACES

OCC Property have reviewed the contents of this Policy and note that the land that contains the Brize Norton War Memorial is proposed to be designated as a Local Green Space (**Local Green Space Area 3 - War Memorial**). We further note that this land is highways land and anticipate that the Highways team will respond to this as appropriate. [See Strategic Comments above which cover this point]



**District:** West Oxfordshire

**Consultation:** Brize Norton Neighbourhood Plan 2020 – 2031 (Pre-Submission Document)

**Team:** Cherwell & West Infrastructure Locality Team

**Date:** 18<sup>th</sup> August 2023

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## **Transport Strategy Comments**

The Transport Strategy Team have considered the draft plan and have no comments to make.

**District:** West Oxfordshire

**Consultation:** Brize Norton Neighbourhood Plan 2020 – 2031 (Pre-Submission Document)

**Team:** Archaeology

**Officer's Name:** Richard Oram

**Officer's Title:** Lead Archaeologist

**Date:** 31<sup>st</sup> August 2023

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## **Archaeology Comments**

The Neighbourhood Plan includes a brief section on heritage in section 5.4. This however does not include any details but does contain a reference to an appendix setting out the history of the settlement. This reference is however misleading, and it is document 1 and not document 9 on appendix 06. This history contains only sparse information on pre-Norman heritage assets and would benefit from including details on the Iron Age and Roman settlements within the plan area as well as the two sites of deserted medieval villages. Details of which can be found on the online Heritage Search records held by Oxfordshire County Council.

### **[Heritage Search - Oxfordshire County Council](#)**

There are however no specific policies for the conservation and enhancement of the historic environment. Section 6.2 does include heritage as a heading, but the policies contained within this section do not include provision for heritage assets.

The NPPF states that

190. Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. (NPPF 2021, para 190)

This plan should therefore include a positive strategy for the conservation of the historic environment, which will need to include all heritage assets, including archaeological sites.

The NPPF defines a heritage asset as

**Heritage asset:** A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing). (NPPF 2012, Annex2: Glossary).

And defines the historic environment as

**Historic environment:** All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora. (NPPF 2012, Annex2: Glossary).

Not all non-designated assets are therefore buildings and therefore the plan should consider the impacts on heritage assets as set out in the NPPF.

We would therefore recommended that the Neighbourhood Plan should include a heritage policy along the lines of:

**Policy - Historic Environment**

The parish's designated historic heritage assets and their settings, both above and below ground including listed buildings, scheduled monuments and conservation areas will be conserved and enhanced for their historic significance and their important contribution to local distinctiveness, character and sense of place.

Proposals for development that affect non-designated historic assets will be considered taking account of the scale of any harm or loss and the significance of the heritage asset as set out in the National Planning Policy Framework (NPPF 2021).

This has however, not been included and the policy within the plan only relates to standing buildings and does not appropriately deal with the historic environment as set out the NPPF.

**District:** West Oxfordshire

**Consultation:** Brize Norton Neighbourhood Plan 2020 – 2031 (Pre-Submission Document)

**Team:** Pupil Place Planning

**Date:** 4<sup>th</sup> September 2023

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## **Education Comments**

The Pupil Place Planning Team have considered the draft plan and have no comments to make.



David Wilson  
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M: +44 (0) 7747 647031

Brize Norton Parish Council

Issued via email:  
clerk@brizenortonparishcouncil.co.uk

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Clearwater Court  
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Reading  
RG1 8DB

07 September 2023

## West Oxfordshire – Brize Norton Neighbourhood Plan Public Consultation Survey

Dear Sir/Madam,

Thank you for allowing Thames Water Utilities Ltd (Thames Water) to comment upon the above.

As you will be aware, Thames Water are the statutory water supply and sewerage undertaker for West Oxfordshire and are hence a **“specific consultation body”** in accordance with the Town & Country Planning (Local Planning) Regulations 2012.

We have the following comments on the consultation in relation to our water supply and sewerage undertakings:

### **General Water and Wastewater Infrastructure Comments**

A key sustainability objective for the preparation of Local Plans and Neighbourhood Plans should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 20 of the revised National Planning Policy Framework (NPPF), 2023, states: *“Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for... infrastructure for waste management, water supply, wastewater...”*

Paragraph 11 states: *“Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that:*

*a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects”*

Paragraph 28 relates to non-strategic policies and states: *“Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure...”*

Paragraph 26 of the revised NPPF goes on to state: *“Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production*

*of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary....”*

The web based National Planning Practice Guidance (NPPG) includes a section on ‘water supply, wastewater and water quality’ and sets out that Local Plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with development needs. The introduction to this section also sets out that *“Adequate water and wastewater infrastructure is needed to support sustainable development”* (Paragraph: 001, Reference ID: 34-001-20140306).

Thames Water therefore recommends that developers engage with them at the earliest opportunity (in line with paragraph 26 of the revised NPPF) to establish the following:

- The developments demand for water supply infrastructure;
- The developments demand for Sewage/Wastewater Treatment and network infrastructure both on and off site and can it be met; and
- The surface water drainage requirements and flood risk of the development both on and off site and can it be met.

Thames Water offer a free Pre-Planning service which confirms if capacity exists to serve the development or if upgrades are required for potable water, waste water and surface water requirements. Details on Thames Water’s free pre planning service are available at: <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Water-and-wastewater-capacity>

In light of the above comments and Government guidance we agree that the Neighbourhood Plan should include a specific reference to the key issue of the provision of wastewater/sewerage and water supply infrastructure to service development proposed in a policy. This is necessary because it will not be possible to identify all of the water/sewerage infrastructure required over the plan period due to the way water companies are regulated and plan in 5 year periods (Asset Management Plans or AMPs). We recommend that the Neighbourhood Plan include the following policy/supporting text:

***“Where appropriate, planning permission for developments which result in the need for off-site upgrades, will be subject to conditions to ensure the occupation is aligned with the delivery of necessary infrastructure upgrades.”***

***“The Local Planning Authority will seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Developers are encouraged to contact the water/waste water company as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. Where there is a capacity constraint the Local Planning Authority will, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development.”***

#### **Policy SD1 - Water Efficiency/Sustainable Design**

- We support the reference to water efficiency, but consider that this needs to be strengthened to ensure best results.

The Environment Agency has designated the Thames Water region to be “seriously water stressed” which reflects the extent to which available water resources are used. Future



pressures on water resources will continue to increase and key factors are population growth and climate change.

Water conservation and climate change is a vitally important issue to the water industry. Not only is it expected to have an impact on the availability of raw water for treatment but also the demand from customers for potable (drinking) water. Therefore, Thames Water support the mains water consumption target of 110 litres per head per day (105 litres per head per day plus an allowance of 5 litres per head per day for gardens) as set out in the NPPG (Paragraph: 014 Reference ID: 56-014-20150327) and support the inclusion of this requirement in the Policy.

Thames Water promote water efficiency and have a number of water efficiency campaigns which aim to encourage their customers to save water at local levels. Further details are available on the our website via the following link:

<https://www.thameswater.co.uk/Be-water-smart>

It is our understanding that the water efficiency standards of 105 litres per person per day is only applied through the building regulations where there is a planning condition requiring this standard (as set out at paragraph 2.8 of Part G2 of the Building Regulations). As the Thames Water area is defined as water stressed it is considered that such a condition should be attached as standard to all planning approvals for new residential development in order to help ensure that the standard is effectively delivered through the building regulations.

Within Part G of Building Regulations, the 110 litres/person/day level can be achieved through either the 'Calculation Method' or the 'Fittings Approach' (Table 2.2). The Fittings Approach provides clear flow-rate and volume performance metrics for each water using device / fitting in new dwellings. Thames Water considers the Fittings Approach, as outlined in Table 2.2 of Part G, increases the confidence that water efficient devices will be installed in the new dwelling. Insight from our smart water metering programme shows that household built to the 110 litres/person/day level using the Calculation Method, did not achieve the intended water performance levels.

Proposed policy text:

***“Development must be designed to be water efficient and reduce water consumption. Refurbishments and other non-domestic development will be expected to meet BREEAM water-efficiency credits. Residential development must not exceed a maximum water use of 105 litres per head per day (excluding the allowance of up to 5 litres for external water consumption) using the ‘Fittings Approach’ in Table 2.2 of Part G of Building Regulations. Planning conditions will be applied to new residential development to ensure that the water efficiency standards are met.”***

#### **Policy 7.2.1 - Comments in Relation to Flood Risk and Sustainable Drainage Systems**

The National Planning Practice Guidance (NPPG) states that a sequential approach should be used by local planning authorities in areas known to be at risk from forms of flooding other than from river and sea, which includes "Flooding from Sewers".

Flood risk sustainability objectives and policies should also make reference to 'sewer flooding' and an acceptance that flooding can occur away from the flood plain as a result of development where off site sewerage infrastructure and capacity is not in place ahead of development.

With regard to surface water drainage it is the responsibility of the developer to make proper provision for drainage to ground, watercourses or surface water sewer. It is important to

reduce the quantity of surface water entering the sewerage system in order to maximise the capacity for foul sewage to reduce the risk of sewer flooding.

Limiting the opportunity for surface water entering the foul and combined sewer networks is of critical importance to Thames Water. Thames Water have advocated an approach to SuDS that limits as far as possible the volume of and rate at which surface water enters the public sewer system. By doing this, SuDS have the potential to play an important role in helping to ensure the sewerage network has the capacity to cater for population growth and the effects of climate change.

SuDS not only help to mitigate flooding, they can also help to: improve water quality; provide opportunities for water efficiency; provide enhanced landscape and visual features; support wildlife; and provide amenity and recreational benefits.

With regard to surface water drainage, Thames Water request that the following paragraph should be included in the Neighbourhood Plan ***“It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding.”***

#### **Specific Comments on Thames Water SUDS Area:**

This area is prone to Groundwater and there is a Groundwater Impacted System Management Plan (GISMP) in progress which shows what we’re doing to alleviate the issues on a year on year basis within Brize Norton and the areas which drain to Witney Sewage Treatment Works (STW).

The summary from 2021-2022 report is below:

*“Rainfall in the Witney catchment over the 2021/22 hydrological year has been below average, with groundwater levels in the aquifer beneath Witney not reaching the levels seen in previous years which triggered groundwater ingress into the sewerage network and elevated flow/depth readings at monitoring sites. Lift and look and CCTV surveys will continue throughout the remaining wet winter periods within this AMP7 period (2020- 2025) with the aim of finding further priority locations for remediation and investigating/justifying the need for future larger scale lining as part of our 2024 Price Review (PR) process if required”*

We'll have the latest update in October.

Where an area is impacted by ground water, we request that care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. The developer should also liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network.

#### **Site Allocations**

We recommend Developers contact Thames Water to discuss their development proposals by using our pre app service via the following link: <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Water-and-wastewater-capacity>

It should be noted that in the event of an upgrade to our sewerage network assets being required, up to three years lead in time is usual to enable for the planning and delivery of the upgrade. As a developer has the automatic right to connect to our sewer network under the Water Industry Act we may also request a drainage planning condition if a network upgrade is

required to ensure the infrastructure is in place ahead of occupation of the development. This will avoid adverse environmental impacts such as sewer flooding and / or water pollution.

We recommend developers attach the information we provide to their planning applications so that the Council and the wider public are assured wastewater and water supply matters for the development are being addressed.

We trust the above is satisfactory, but please do not hesitate to contact David Wilson on the above number if you have any queries.

Yours faithfully,

David Wilson  
Thames Water Property Town Planner

Date: 07 September 2023  
Our ref: 444259  
Your ref: Brize North Neighbourhood Plan



Mrs Jo Webb  
Brize Norton Parish Council

Hornbeam House  
Crewe Business Park  
Electra Way  
Crewe  
Cheshire  
CW1 6GJ

T 0300 060 3900

**BY EMAIL ONLY**

[clerk@brizenortonparishcouncil.co.uk](mailto:clerk@brizenortonparishcouncil.co.uk)

Dear Mrs Webb

**Brize Norton Neighbourhood Plan – Regulation 14 Consultation**

Thank you for your consultation on the above dated 01 August 2023.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

**Natural England does not have any specific comments on this draft neighbourhood plan.**

However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan and to the following information.

Natural England does not hold information on the location of significant populations of protected species, so is unable to advise whether this plan is likely to affect protected species to such an extent as to require a Strategic Environmental Assessment. Further information on protected species and development is included in [Natural England's Standing Advice on protected species](#).

Furthermore, Natural England does not routinely maintain locally specific data on all environmental assets. The plan may have environmental impacts on priority species and/or habitats, local wildlife sites, soils and best and most versatile agricultural land, or on local landscape character that may be sufficient to warrant a Strategic Environmental Assessment. Information on ancient woodland, ancient and veteran trees is set out in Natural England/Forestry Commission [standing advice](#).

We therefore recommend that advice is sought from your ecological, landscape and soils advisers, local record centre, recording society or wildlife body on the local soils, best and most versatile agricultural land, landscape, geodiversity and biodiversity receptors that may be affected by the plan before determining whether a Strategic Environmental Assessment is necessary.

Natural England reserves the right to provide further advice on the environmental assessment of the plan. This includes any third party appeal against any screening decision you may make. If an Strategic Environmental Assessment is required, Natural England must be consulted at the scoping and environmental report stages.

For any further consultations on your plan, please contact: [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

Yours sincerely  
Sally Wintle  
Consultations Team

## Annex 1 - Neighbourhood planning and the natural environment: information, issues and opportunities

### Natural environment information sources

The [Magic](http://magic.defra.gov.uk/)<sup>1</sup> website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: **Agricultural Land Classification, Ancient Woodland, Areas of Outstanding Natural Beauty, Local Nature Reserves, National Parks (England), National Trails, Priority Habitat Inventory, public rights of way (on the Ordnance Survey base map) and Sites of Special Scientific Interest (including their impact risk zones)**. Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available from [the Association of Local Environmental Records Centres](http://theassociationoflocalenvironmentalrecordscentres.org/) .

**Priority habitats** are those habitats of particular importance for nature conservation, and the list of them can be found [here](#)<sup>2</sup>. Most of these will be mapped either as **Sites of Special Scientific Interest**, on the Magic website or as **Local Wildlife Sites**. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.

**National Character Areas** (NCAs) divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found [here](#)<sup>3</sup>.

There may also be a local **landscape character assessment** covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. Your local planning authority should be able to help you access these if you can't find them online.

If your neighbourhood planning area is within or adjacent to a **National Park** or **Area of Outstanding Natural Beauty** (AONB), the relevant National Park/AONB Management Plan for the area will set out useful information about the protected landscape. You can access the plans on from the relevant National Park Authority or Area of Outstanding Natural Beauty website.

General mapped information on **soil types** and **Agricultural Land Classification** is available (under 'landscape') on the [Magic](http://magic.defra.gov.uk/)<sup>4</sup> website and also from the [LandIS website](http://landis.org.uk/)<sup>5</sup>, which contains more information about obtaining soil data.

### Natural environment issues to consider

The [National Planning Policy Framework](https://www.gov.uk/government/publications/national-planning-policy-framework--2)<sup>6</sup> sets out national planning policy on protecting and enhancing the natural environment. [Planning Practice Guidance](http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/)<sup>7</sup> sets out supporting guidance.

Your local planning authority should be able to provide you with further advice on the potential impacts of your plan or order on the natural environment and the need for any environmental assessments.

### Landscape

Your plans or orders may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness.

If you are proposing development within or close to a protected landscape (National Park or Area of Outstanding Natural Beauty) or other sensitive location, we recommend that you carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping.

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<sup>1</sup> <http://magic.defra.gov.uk/>

<sup>2</sup> <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

<sup>3</sup> <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>

<sup>4</sup> <http://magic.defra.gov.uk/>

<sup>5</sup> <http://www.landis.org.uk/index.cfm>

<sup>6</sup> <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

<sup>7</sup> <http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/>

## Wildlife habitats

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed [here](#)<sup>8</sup>), such as Sites of Special Scientific Interest or [Ancient woodland](#)<sup>9</sup>. If there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.

## Priority and protected species

You'll also want to consider whether any proposals might affect priority species (listed [here](#)<sup>10</sup>) or protected species. To help you do this, Natural England has produced advice [here](#)<sup>11</sup> to help understand the impact of particular developments on protected species.

## Best and Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 112. For more information, see [Guide to assessing development proposals on agricultural land](#)<sup>12</sup>.

## **Improving your natural environment**

Your plan or order can offer exciting opportunities to enhance your local environment and should provide net gains for biodiversity in line with the [National Planning Policy Framework](#). If you are setting out policies on new development or proposing sites for development, you should follow the biodiversity mitigation hierarchy and seek to ensure impacts on habitats are avoided or minimised before considering opportunities for biodiversity enhancement. You may wish to consider identifying what environmental features you want to be retained or enhanced or new features you would like to see created as part of any new development and how these could contribute to biodiversity net gain and wider environmental goals.

Opportunities for environmental enhancement might include:

- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Think about how lighting can be best managed to reduce impacts on wildlife.
- Adding a green roof to new buildings.
- Providing a new footpath through the new development to link into existing rights of way.

[Defra's Biodiversity Metric](#) should be used to understand the baseline biodiversity value of proposed development sites and may be used to calculate biodiversity losses and gains where detailed site development proposals are known. For small development sites the [Small Sites Metric](#) may be used. This is a simplified version of [Defra's Biodiversity Metric](#) and is designed for use where certain criteria are met.

Where on site measures for biodiversity net gain are not possible, you should consider off site measures.

You may also want to consider enhancing your local area in other ways, for example by:

- Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community.
- Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision. Natural England's [Green Infrastructure Framework](#) sets out further information on green infrastructure standards and principles
- Identifying green areas of particular importance for special protection through Local Green Space designation (see [Planning Practice Guidance](#)<sup>13</sup>).

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<sup>8</sup> <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

<sup>9</sup> <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

<sup>10</sup> <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

<sup>11</sup> <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

<sup>12</sup> <https://www.gov.uk/government/publications/agricultural-land-assess-proposals-for-development/guide-to-assessing-development-proposals-on-agricultural-land>

<sup>13</sup> <https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space>

- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks or on verges, changing hedge cutting timings and frequency).
- Planting additional street trees.
- Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition, or clearing away an eyesore).

Natural England's [Environmental Benefits from Nature tool](#) may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside [Defra's Biodiversity Metric](#) and is available as a beta test version.



Ms Jo Webb     Direct Dial: -  
Brize Norton Parish Council  
Our ref: PL00793720  
11 August 2023

Dear Ms Webb

### **Neighbourhood Plan for Brize Norton**

Thank you for consulting Historic England about your Neighbourhood Plan. As the Government's adviser on the historic environment, Historic England is keen to ensure that the protection of the historic environment is fully considered at all stages and levels of the local planning process.

Neighbourhood Plans are an important opportunity for local communities to set the agenda for their places, setting out what is important and why about different aspects of their parish or other area within the neighbourhood area boundary, and providing clear policy and guidance to readers - be they interested members of the public, planners or developers - regarding how the place should develop over the course of the plan period.

We welcome the production of this neighbourhood plan and are pleased to see that the historic environment of your parish features throughout.

Although your neighbourhood area does contain a number of designated heritage assets, at this point we don't consider there is a need for Historic England to be involved in the detailed development of the strategy for your area, but we offer some general advice and guidance below, which may be of assistance. The conservation officer at your local Council will be the best placed person to assist you in the development of the Plan with respect to the historic environment and can help you to consider and clearly articulate how a strategy can address the area's heritage assets.

Paragraph 190 of the National Planning Policy Framework (2021) sets out that Plans, including Neighbourhood Plans, should set out a positive strategy for the conservation and enjoyment of the historic environment. In particular, this strategy needs to take into account the desirability of sustaining and enhancing the significance of all types of heritage asset where possible, the need for new development to make a positive contribution to local character and distinctiveness; and ensure that it considers opportunities to use the existing historic environment to help reinforce this character of a place.

It is important that, as a minimum, the strategy you put together for your area safeguards those elements of your neighbourhood area that contribute to the significance of those assets. This will ensure that they can be enjoyed by future generations of the area and make sure your plan is in line with the requirements of national planning policy, as found in the National Planning Policy Framework.

The government's National Planning Practice Guidance <<https://www.gov.uk/guidance/neighbourhood-planning>> on neighbourhood planning is clear that, where relevant, Neighbourhood Plans need to include enough information about local heritage to guide local authority planning decisions and to put broader strategic heritage policies from the local authority's local plan into action but at a neighbourhood scale. Your Neighbourhood Plan is therefore an important opportunity for a community to develop a positive strategy for the area's locally important



heritage assets that aren't recognised at a national level through listing or scheduling. If appropriate this should include enough information about local non-designated heritage assets, including sites of archaeological interest, locally listed buildings, or identified areas of historic landscape character. Your plan could, for instance, include a list of locally important neighbourhood heritage assets, (e.g. historic buildings, sites, views or places of importance to the local community) setting out what factors make them special. These elements can then be afforded a level of protection from inappropriate change through an appropriately worded policy in the plan. We refer you to our guidance on local heritage listing for further information: HE Advice Note 7 - local listing: <<https://www.historicengland.org.uk/images-books/publications/local-heritage-listing-advice-note-7>>

The plan could also include consideration of any Grade II listed buildings or locally designated heritage assets which are at risk or in poor condition, and which could then be the focus of specific policies aimed at facilitating their enhancement. We would refer you to our guidance on writing effective neighbourhood plan policies, which can be found here: <<https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/policy-writing/>>

If you have not already done so, we would recommend that you speak to the staff at local authority archaeological advisory service who look after the Historic Environment Record and give advice on archaeological matters. They should be able to provide details of not only any designated heritage assets but also non designated locally important buildings, archaeological remains and landscapes. Some Historic Environment Records may be available to view on-line via the Heritage Gateway ([www.heritagegateway.org.uk](http://www.heritagegateway.org.uk) <<http://www.heritagegateway.org.uk>>). It may also be useful to involve local voluntary groups such as a local Civic Society, local history groups, building preservation trusts, etc. in the production of your Neighbourhood Plan, particularly in the early evidence gathering stages.

Your local authority might also be able to provide you with more general support in the production of your Neighbourhood Plan, including the provision of appropriate maps, data, and supporting documentation. There are also funding opportunities available from Locality that could allow the community to hire appropriate expertise to assist in such an undertaking. This could involve hiring a consultant to help in the production of the plan itself, or to undertake work that could form the evidence base for the plan. More information on this can be found on the My Community website here: <<http://mycommunity.org.uk/funding-options/neighbourhood-planning/>>.

The Conservation Area may have an appraisal document that would ordinarily set out what the character and appearance of the area is that should be preserved or enhanced. The neighbourhood plan is an opportunity for the community to clearly set out which elements of the character and appearance of the neighbourhood area as a whole are considered important, as well as provide specific policies that protect the positive elements, and address any areas that negatively affect that character and appearance. An historic environment section of your plan could include policies to achieve this and, if your Conservation Area does not have an up to date appraisal, these policies could be underpinned by a local character study or historic area assessment. This could be included as an appendix to your plan. Historic England's guidance notes for this process can be found here: HE Advice Note 1 - conservation area designation, appraisal and management <<https://historicengland.org.uk/images-books/publications/conservation-area-designation-appraisal-management-advice-note-1/>>, and here: <<https://historicengland.org.uk/images-books/publications/understanding-place-historic-area-assessments/>>. The funding opportunities available from Locality discussed above could also assist with having this work undertaken.

The NPPF (paragraphs 124 - 127) emphasises the importance placed by the government on good design, and this section sets out that planning (including Neighbourhood Plans) should, amongst other things, be based on clear objectives and a robust evidence base that shows an understanding and evaluation of an area, in this case the Parish of Brize Norton. The policies of neighbourhood plans should also ensure that developments in the area establish a strong sense of place and respond to local character and history by reflecting the local identity of the place - for instance through the use of appropriate materials, and attractive design.

Your neighbourhood plan is also an opportunity for the community to designate Local Green Spaces, as encouraged by national planning policy. Green spaces are often integral to the character of place for any given area, and your plan could include policies that identified any deficiencies with existing green spaces or access to them or aimed at managing development around them. Locality has produced helpful guidance on this, which is available here: <https://mycommunity.org.uk/resources/neighbourhood-planning-local-green-spaces>.

You can also use the neighbourhood plan process to identify any potential Assets of Community Value in the neighbourhood area. Assets of Community Value (ACV) can include things like local public houses, community facilities such as libraries and museums, or again green open spaces. Often these can be important elements of the local historic environment, and whether or not they are protected in other ways, designating them as an ACV can offer an additional level of control to the community with regard to how they are conserved. There is useful information on this process on Locality's website here: <http://mycommunity.org.uk/take-action/land-and-building-assets/assets-of-community-value-right-to-bid> .

Communities that have a neighbourhood plan in force are entitled to claim 25% of Community Infrastructure Levy (CIL) funds raised from development in their area. The Localism Act 2011 allows this CIL money to be used for the maintenance and on-going costs associated with a range of heritage assets including, for example, transport infrastructure such as historic bridges, green and social infrastructure such as historic parks and gardens, civic spaces, and public places. As a Qualifying Body, your neighbourhood forum can either have access to this money or influence how it is spent through the neighbourhood plan process, setting out a schedule of appropriate works for the money to be spent on. Historic England strongly recommends that the community therefore identifies the ways in which CIL can be used to facilitate the conservation of the historic environment, heritage assets and their setting, and sets this out in the neighbourhood plan. More information and guidance on this is available from Locality, here: <https://mycommunity.org.uk/resources/community-infrastructure-levy-neighbourhood-planning-toolkit>.

If you are concerned about the impact of high levels of traffic through your area, particularly in rural areas, the "Traffic in Villages" toolkit developed by Hamilton-Baillie Associates in conjunction with Dorset AONB Partnership may be a useful resource to you.

Further information and guidance on how heritage can best be incorporated into Neighbourhood Plans has been produced by Historic England, including on evidence gathering, design advice and policy writing. Our webpage contains links to a number of other documents which your forum might find useful. These can help you to identify what it is about your area which makes it distinctive, and how you might go about ensuring that the character of the area is protected or improved through appropriate policy wording and a robust evidence base. This can be found here: <https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood>.

Historic England Advice Note 11- Neighbourhood Planning and the Historic Environment, which is freely available to download, also provides useful links to exemplar neighbourhood plans that may provide you with inspiration and assistance for your own. This can be found here: [<https://historicengland.org.uk/images-books/publications/neighbourhood-planning-and-the-historic-environment/>](https://historicengland.org.uk/images-books/publications/neighbourhood-planning-and-the-historic-environment/)

The following general guidance also published by Historic England may also be useful to the plan forum in preparing the neighbourhood plan or considering how best to develop a strategy for the conservation and management of heritage assets in the area. It may also be useful to provide links to some of these documents in the plan:

HE Advice Note 2 - making changes to heritage assets: [<https://historicengland.org.uk/images-books/publications/making-changes-heritage-assets-advice-note-2/>](https://historicengland.org.uk/images-books/publications/making-changes-heritage-assets-advice-note-2/)

HE Good Practice Advice in Planning 3 - the setting of heritage assets: [<https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/>](https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/)

If you are considering including Site Allocations for housing or other land use purposes in your neighbourhood plan, we would recommend you review the following two guidance documents, which may be of use:

HE Advice Note 3 - site allocations in local plans: [<https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans>](https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans)

HE Advice Note 8 - Sustainability Appraisal and Strategic Environmental Assessment : [<https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/>](https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/)

We recommend the inclusion of a glossary containing relevant historic environment terminology contained in the NPPF, in addition to details about the additional legislative and policy protections that heritage assets and the historic environment in general enjoys.

Finally, we should like to stress that this advice is based on the information provided by Brize Norton Parish Council in their correspondence. To avoid any doubt, this does not reflect our obligation to provide further advice on or, potentially, object to specific proposals which may subsequently arise as a result of the proposed neighbourhood plan, where we consider these would have an adverse effect on the historic environment.

If you have any queries about this matter or would like to discuss anything further, please do not hesitate to contact me.

Yours sincerely,

Louise Dandy  
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cc: