

# Representations to Brize Norton Neighbourhood Plan – Regulation 16 Consultation

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# 1. Introduction

- 1.1 These representations, on behalf of Lone Star Land and Graftongate, are to the submission draft consultation of the Brize Norton Neighbourhood Plan (July 2024) (“**the Draft NP**”) under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended).
- 1.2 Lone Star Land and Graftongate’s interest in the Draft NP is that it has control of a large area of land to the north and east of Brize Norton village and Carterton, within Brize Norton Parish, being promoted for sustainable employment and residential development in connection with future growth around Carterton.
- 1.3 The Draft NP would cover the designated ‘Brize Norton Neighbourhood Area’ (as shown on the plan at **Appendix A**), consistent with the parish boundary. However, it is significant that the ‘Neighbourhood Area’, extending beyond the confines and immediate setting of Brize Norton village, has strategic importance. The ‘Neighbourhood Area’ includes:
- an extensive part of RAF Brize Norton, which is the largest airbase in the UK, employing some 7,300 service personnel and civilian staff<sup>1</sup>. The Oxfordshire Local Industrial Strategy recognises RAF Brize Norton to be an asset of international standing<sup>2</sup>, a world leading location for advanced technology and engineering;
  - land adjacent to the northern and eastern edge of Carterton, which is suitable and available for development. Carterton is a ‘main town’ and highest tier settlement within West Oxfordshire, representing a sustainable location for growth; and
  - the A40 corridor as the principal east-west route between Carterton, Oxford and the wider region, including key towns of Witney and Salt Cross / Eynsham.
- 1.4 In respect of any one of these measures, plan making and development across the ‘Neighbourhood Area’ has strategic implications.
- 1.5 Lone Star Land and Graftongate responded to West Oxfordshire District Council’s Regulation 18 consultation to the emerging Local Plan, October 2023, to present how significant growth around Carterton (within the plan area of the Draft NP) would be consistent with the social, economic and

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<sup>1</sup> <https://www.raf.mod.uk/our-organisation/stations/raf-brize-norton/>

<sup>2</sup> Oxfordshire Local Industrial Strategy (July 2019), HM Government & OxLEP

environmental objectives of the Local Plan, providing for housing and employment development needed across the plan period and beyond.

1.6 The District Council itself recognises the opportunity of growth around Carterton to meet its need for development and has commissioned a 'Carterton Masterplan' and 'Carterton Strategic Study' (as per its 'corporate strategy action tracker'<sup>3</sup>) as emerging evidence base to the draft Local Plan.

1.7 Against this background and strategic context, it is important that the Draft NP satisfies the statutory 'basic conditions'<sup>4</sup> of a neighbourhood plan including that it:

- has appropriate regard to national policies and advice contained in national guidance;
- contributes to the achievement of sustainable development; and
- is in general conformity with the strategic policies of the relevant development plan.

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<sup>3</sup> <https://meetings.westoxon.gov.uk/documents/s11466/Annex+B+-+Corporate+Plan+Action+Tracker.pdf>

<sup>4</sup> Paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004

## 2. Timing of the Neighbourhood Plan

- 2.1 Lone Star Land and Graftongate is supportive of the Parish Council's ambition of neighbourhood plan making and the vision of the Draft NP in respect of:

*"To support sustainable development that meets the needs of residents now and in the future, while retaining Brize Norton's separate identity as a rural parish adjacent to, but separate from, the town of Carterton."*<sup>5</sup>

- 2.2 However, given the strategic importance of the 'Neighbourhood Area', it is highlighted that the Draft NP is at risk of being considered out of date in short duration should it conflict with the spatial strategy and policies of the emerging West Oxfordshire Local Plan (which is to provide for significant growth across the District to meet its housing needs). The District Council is working to have a Regulation 19 submission draft Local Plan in June 2025 with examination later that year<sup>6</sup>.
- 2.3 Notably, the Draft NP has regard only, 'Section 4 – Planning and Development Context', to the outdated spatial strategy and strategic policies of the current Local Plan.
- 2.4 In how to address this situation, of the Draft NP being progressed at the same time as the revised Local Plan, the Planning Practice Guidance ("**the PPG**") is relevant<sup>7</sup> – that *"the reasoning and evidence informing the local plan process is likely to be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested"*.
- 2.5 The same section of the PPG further explains that the Parish Council must discuss and aim to agree with the District Council the relationship between policies in the Draft NP and the emerging Local Plan. I.e. the Draft NP must have appropriate regard to the emerging Local Plan as its preferred spatial strategy and strategic policies become clear.
- 2.6 It is therefore suggested, for the Draft NP to endure beyond a period before the emerging Local Plan carries significant weight, that the Parish Council pauses and works to update the draft NP in closer collaboration with the District Council. If strategic conformity between the Draft NP and the emerging Local Plan can be achieved (important given the context of the Neighbourhood Area, highlighted above), this would help avoid the situation where any conflict with the Local Plan would

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<sup>5</sup> Paragraph 6.1 of the Draft NP

<sup>6</sup> West Oxfordshire Local Development Scheme, July 2024

<sup>7</sup> Paragraph: 009 Reference ID: 41-009-20190509

be resolved in favour of the Local Plan, undermining the Draft NP, as the last development plan document to be adopted (in accordance with the Planning and Compulsory Purchase Act<sup>8</sup> which presides over such a situation).

- 2.7 Without such an approach, consistent with the PPG, there is concern that the Draft NP does not satisfy the 'basic condition' of contributing to the achievement of sustainable development.

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<sup>8</sup> Section 38(5) of the Planning and Compulsory Purchase Act (as amended)

### 3. Traffic Through Brize Norton Village

- 3.1 The vision and objectives of the Draft NP refer to the community consultation carried out by the Parish Council. The Draft NP highlights<sup>9</sup> that a great number of responses to that consultation raise significant concerns about traffic through Brize Norton village and road use - speeding, traffic volumes and HGVs routing through the village; lack of cycle routes and ineffective traffic calming; and poor footways and lack of pedestrian crossings.
- 3.2 Whilst the same section asserts that these traffic issues cannot be directly addressed through the Draft NP, it is suggested that the plan could / should go further and positively promote or encourage future solutions that would relieve traffic congestion and associated environmental and safety issues within the village. Such a solution could be a bypass or relief road to the village as could be funded and delivered as part of future development to the east of Brize Norton.
- 3.3 The ambition to find a solution to these traffic issues should be presented in the vision and aims of the Draft NP, which would be effective in relation to how strategic spatial matters of the emerging Local Plan would be considered (contributing to the achievement of sustainable development). This in turn would make a solution to the issues more likely to be achieved.

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<sup>9</sup> P.28 of the Draft NP

## 4. Landscape, Visual and Spatial Policies

- 4.1 Lone Star Land and Graftongate wish to highlight concerns relating to how the Draft NP refers to the landscape character of the 'Neighbourhood Area' and to the wording and justification of Policy CLH1 (Landscape Character), CLH2 (Key Local Views) and CLH3 (Strategic Buffer Zones).

### Claimed Area of High Landscape Value

- 4.2 The Draft NP (p.10) refers to the 'Neighbourhood Area' as being within a locally designated 'Area of High Landscape Value'. A term that is again used on p.43 of the Draft NP.
- 4.3 Such a designation across a widespread area and associated Policy CLH1 have a strategic dimension, reinforced by the spatial relationship to RAF Brize Norton, Carterton and the A40. As the claimed 'Area of High Landscape Value' does not accord with any strategic or other policy of the adopted Local Plan, the Draft NP cannot be considered in general strategic conformity with the development plan and fails that test of 'basic conditions'.
- 4.4 As modification, the use of the term 'Area of High Landscape Value' should not be included in the Draft NP.
- 4.5 Beyond this first point of principle, whether or not the proposed 'Area of High Landscape Value' has any technical justification or merit was considered by Zebra Landscape Architects in the Regulation 14 consultation of the Draft NP. This assessment, in respect of landscape value, is again provided as Landscape Note 1 at **Appendix B**.
- 4.6 In reviewing the Draft NP and relevant evidence base, including the 'landscape Character Assessment, Appendix 08', Landscape Note 1 considers that *"there is no rationale, or assessment criterion by which this non-statutory designation should be applied"*.
- 4.7 Landscape Note 1 goes further, identifying as part of a more detailed assessment that:
- the 'Neighbourhood Area' has no current or proposed designatory status in landscape terms;



- for an area to be considered ‘valued’ (as the courts have ruled) it must show some demonstrable physical attribute, to be informed by recognised guidance<sup>10</sup>, rather than just popularity;
- landscape is more than just open land, including existing urban form, built development and infrastructure – i.e. the wider context of any landscape must be taken into account; and
- an objective assessment of the ‘Neighbourhood Area’s’ landscape quality against GLVIA3 criteria is that it is ‘limited’ or ‘very limited’ in matters of natural heritage, cultural heritage, landscape condition, distinctiveness, recreational, scenic perception and tranquillity.

4.8 Landscape Note 1 itself characterises the ‘Neighbourhood Area’ as including:

- agricultural intensification, which has led to the removal of natural vegetation cover, poor maintenance and loss of field boundaries;
- degraded and lost hedgerows, along with derelict stone walling falling into disrepair;
- frequent intervisibility with the urban edge, built form and paraphernalia associated with Brize Norton village and Carterton;
- large scale and visually dominant agricultural barns;
- noise and visual intrusion of RAF Brize Norton with extensive built form, airfields and military planes seen in long range views; and
- noise and incongruous built form degrading landscape tranquillity and perception of remoteness.

4.9 Landscape Note 1 concludes that:

*“In the absence of any criteria, or any evidence of assessment within the BNPP and its supporting Landscape Character Assessment (Appendix 08), the continuation of this local designation is misleading and lacks legitimacy. To enforce this local designation only serves to*

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<sup>10</sup> Landscape Institutes 2013 Guidelines for Landscape and Visual Impact Assessment, Third Addition (GLVIA3)

*misinform the plan making process, and inappropriately influence decision making.”* (paragraph 4.8)

- 4.10 For these reasons, the Draft NP does not have appropriate regard to advice in GLVIA3 as national guidance and does not contribute to the achievement of sustainable development, such that it does not meet the statutory test of ‘basic conditions’

### **Policy CLH1 – Landscape Character**

- 4.11 Policy CLH1 is positively worded to support development that enhances the character of the village and surrounding landscape. Given that development may come forwards in a sustainable location that inherently would not enhance the landscape, for the policy to be effective and contribute in a balanced way to the achievement of sustainable development, the first sentence should be amended to read:

*“... proposals for new development that relate well and seek to enhance or maintain as far as possible the distractive character...”*

- 4.12 At criterion i of Policy CLH1, a similar provision should be included for the same reasons:

*“...developments demonstrate how they will retain and enhance as far as possible the key components of the rural landscape character...”*

- 4.13 Criterion ii of Policy CLH1, referencing as significant all views presenting in the document ‘LCA Key Views – Appendix 09’, is inconsistent with the context / rationale of Policy CLH1. On p.36 of the Draft NP, it is stated (in bold text) that:

***“For clarity, this Plan does not seek to protect all the views listed in Appendix 9. A limited number of Key Views that are specifically required to be protected are set out in Policy CLH2”***

- 4.14 Accordingly, in respect of achieving sustainable development, criterion ii of Policy CLH1 should be revised to refer only to any views that might be recognised under Policy CLH2.

### **Policy CLH2 – Key Local Views**

- 4.15 The Draft NP at section 7.1.2 identifies nine ‘key local views’ which it seeks under Policy CLH2 to maintain and enhance.

4.16 Landscape Note 2 at **Appendix C** considers two of these views (View D and View E to the north west of Brize Norton Village) (and relevant evidence base) as would relate to land within the control of Lone Star Land and Graftongate. It finds that:

- there is limited rationale in the Draft NP to explain the significance of these views. Criteria by which these views were appraised and determined as important are not contained within the evidence base;
- the views are simply typical of the environment surrounding Brize Norton village and of the wider open countryside towards Carterton, as well as that extending to outlying villages; and
- the features experienced in these views are typical of the host landscape, influenced by the degrading effects of agricultural intensification as well as the dominant effects of RAF Brize Norton.

4.17 Accordingly, where the key views do not have appropriate regard to advice in GLVIA3 as national guidance, as well as lacking justification and so frustrating the achievement of sustainable development, the Draft NP does not meet the statutory test of ‘basic conditions’.

4.18 The views set out by Policy CLH2 should be reviewed and reconsidered by the Brize Norton Neighbourhood Plan Steering Group.

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

4.19 Policy CLH3 proposes two ‘strategic buffer zones’ – one between Brize Norton village and the perimeter of RAF Brize Norton (Zone A); the other between the built form of development at Brize Meadows and Carterton Road (Zone B).

4.20 As the Draft NP itself describes, these areas in themselves are a constraint of strategic importance and more so being adjacent to the strategic significance of Carterton and RAF Brize Norton. As these ‘strategic buffer zones’ are beyond any policy or constraint of the adopted Local Plan, Policy CLH3 fails to satisfy the strategic conformity test of the ‘basic conditions’.

4.21 Notwithstanding the in principle objections raised above, concerns are raised that ‘strategic buffer zone A’, by extending to the south of Brize Norton village, would cover an area beyond that necessary to prevent the east-west coalescence of the village and the airbase. The continuation of ‘strategic buffer zone A’ in this way would restrict any future growth at the village that would be most in

keeping with its linear form – i.e. contiguous with the existing built area along Station Road. For this reason, the southern extension of ‘strategic buffer zone A’ cannot be considered to contribute to the achievement of sustainable development and should be reduced in area (even if accepted in principle).

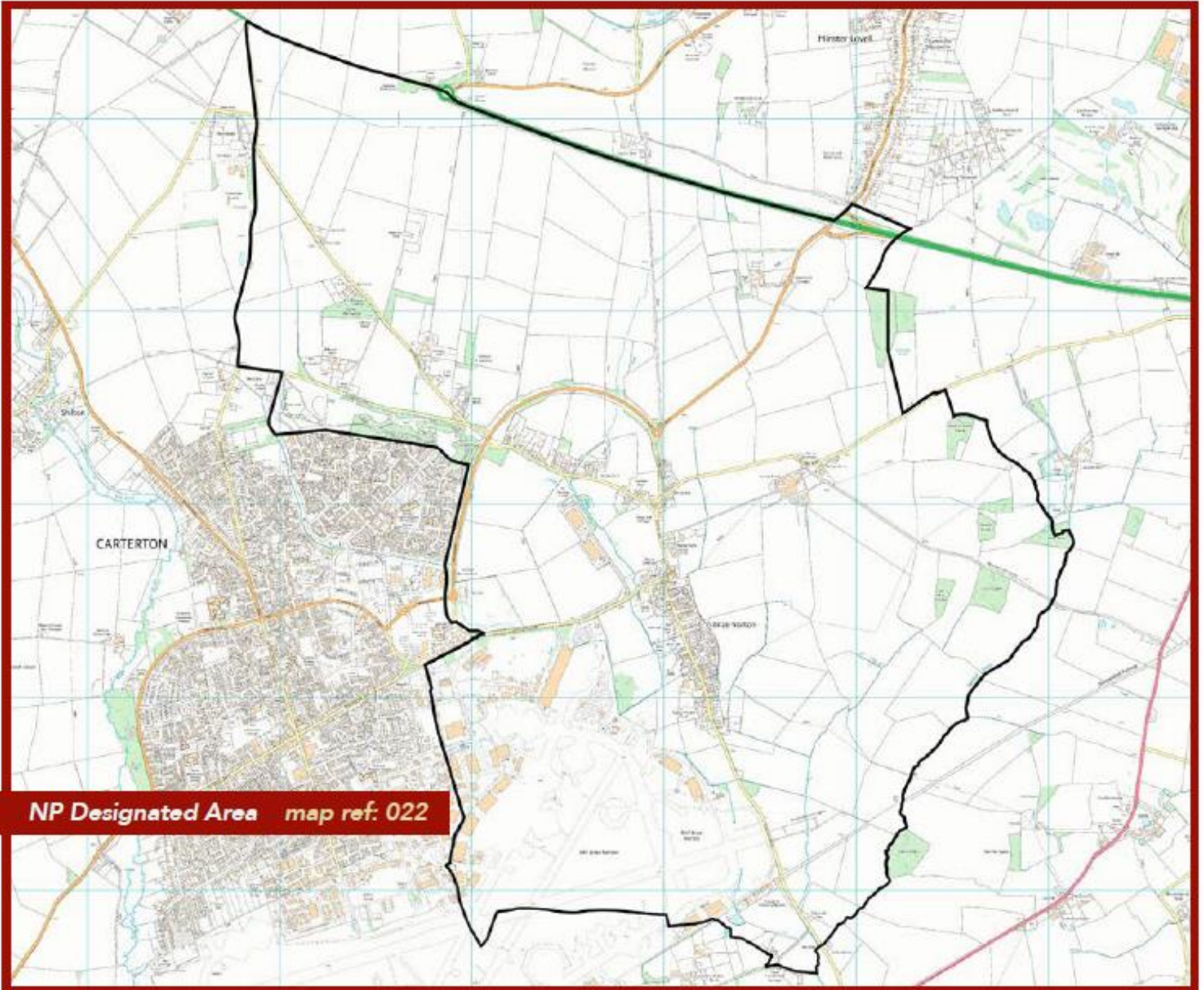
## 5. Conclusion

5.1 Overall, these representations demonstrate that the Draft NP has a number of shortcomings against the statutory 'basic conditions' tests in that it:

- does not have sufficient regard to the emerging West Oxfordshire Local Plan and evidence base;
- it seeks to protect areas of landscape and key views that are without justification against relevant national guidance; and
- proposes a strategic spatial constraint that is not in general conformity with the development plan.

5.2 Accordingly, the Draft NP does not contribute to the achievement of sustainable development.

**Appendix A      Brize Norton Neighbourhood Area**



**Appendix B      Landscape Note 1**



## LANDSCAPE MATTER ONE: AREA OF HIGH LANDSCAPE VALUE

- 2.1. Local Planning Authorities in England can use Local Landscape Designations (LLD) to protect locally important landscapes, one of which is Area of High Landscape Value or AHLV. Others include Special Landscape Areas (SLA) and Areas of Special Landscape Importance (ASLI).
- 2.2. An Area of High Landscape Value (AHLV) is an area of land in England which is considered to be of high landscape quality with strong distinctive characteristics which make them particularly sensitive to development. The designation was established under the Town and Country Planning Act 1947.
- 2.3. Appendix 08 of the BNNP, Planning Context section on page 5, the BNNP states (N.B. Emphasis added by ZLA):

*'Brize Norton is a parish in the West Oxfordshire District Council. It is listed in the Local Plan as a 'village' within the hierarchy of settlements and sits within the strategic Carterton Sub -Area. It does not have a Conservation Area or a defined settlement boundary. Statutory designations within the parish include 37 listed buildings and structures (under 29 separate listings), mostly consisting of stone houses and thatched cottages in the village and some of the surrounding farmhouses. The parish is also host to a number of locally designated wildlife sites. The parish lies within a locally designated Area of High Landscape Value.'*

- 2.4. Oddly, Section 6 of the BNNP ('Neighbourhood Plan Vision, Objectives and Policies') does not state this local designation, nor does Section 7 ('Policies') include this local designation as part of its 'Character, Heritage and Landscape' objectives, and remains silent. Rather, this matter is stated with in the Glossary of the BNNP (N.B. Emphasis added by ZLA):

*'Although the Parish is not covered by any statutory landscape designations (e.g., AONB [Area of Outstanding Natural Beauty]), it is within an Area of High Landscape Value (Landscape Character Assessment APPENDIX 08)'*

- 2.5. This provision does not accord with the current Local Plan (West Oxfordshire Local Plan 2031, September 2018), and on review of the referenced Landscape Character Assessment Appendix 08, which provides an evidence base for the BNNP, there is no rationale, or assessment criterion by which this non-statutory designation should be applied.

### **The value of the site in policy terms**

- 2.6. The new National Planning Policy Framework ('the Framework') was revised and published by the Government on 20th July 2021. Like its predecessor, the new Framework continues to identify a hierarchy of landscapes – albeit not in express terms - with differing values in the planning balance.
- 2.7. The status of landscapes in this hierarchy affects the weight to be afforded in the planning balance to land use change, such that (at the top end) there is a 'presumption against' change for major development in nationally designated landscape except in exceptional circumstances. By the same token, change to undesignated urban edge site adjoining open countryside must weigh least in the planning balance.
- 2.8. At the 'lower end' of the hierarchy, all landscapes have intrinsic character, beauty – and therefore social value - which the planning system should 'recognise' (paragraph 174 (b)). ZLA considers that the settings of Nationally or locally designated landscape may be more sensitive than other landscapes further afield away from such landscape as an Area of Outstanding Natural Beauty. This is by virtue mainly of visual association with the designated area, but they are not automatically so. Each circumstance needs to be treated on its own merits, rather than simply 'de facto'.



- 2.9. It is common ground between the BNNP and our own desk-top analysis, that the site, and the wider Parish area has no designatory status in landscape terms, nor is it proposed to have such status. Additionally, It is also common ground, that the parish is located outside of the Cotswolds Area of Outstanding Natural Beauty, with the site being located over 2km south east of the AONB (at its closest location); see Appendix ZLA 1.
- 2.10. Consequently, whilst all landscapes have some intrinsic value, as recognised by the NPPF para 174 (b), the Local Planning Authority have not made reservation in the current Local Plan for this elevated value above that of open countryside within the Parish, and at the site area.

### **The value of the site locally**

- 2.11. The question of what constitutes a valued landscape and the features that define one have evolved over time. One of the most important early precedents was set by the Stroud District Council v Gladman Developments case of 2014, in which the local authority challenged an inspector's decision to grant permission for a 150-home scheme in the Cotswolds. The High Court judge agreed with the inspector's conclusion that "to be valued would require the site to show some demonstrable physical attribute rather than just popularity".
- 2.12. Over recent years, the practice has become established of determining whether those attributes are present by referring to box 5.1 of the Landscape Institute's 2013 Guidelines for Landscape and Visual Impact Assessment, Third Edition (GLVIA3), which sets out eight criteria to be considered when determining the value of landscapes not covered by a national designation, such as area of outstanding natural beauty (AONB) or national park status.
- 2.13. The criteria are: landscape quality and condition, conservation interest, scenic quality, recreational value, rarity, perceptual aspects, representativeness and associations. While they lack official status, the guidelines have become useful for resolving whether a landscape is valued.
- 2.14. As GLVIA reminds us, the landscape context for this proposal is not simply the open agricultural land, it also includes the existing urban development, settlement edge, as well as the extensive RAF air base at Brize Norton. Consequently, the term landscape includes both the built up and open landscapes of the urban, suburban and rural environment; however, determining landscape value should be more than just a judgement of popularity.
- 2.15. The Local Planning Authority have not made reservation in the current Local Plan for this elevated value above that of open countryside. In determining the appropriateness of applying the local/non-designated Area of High Landscape Value through the BNNP, one needs to recognise that any given site (usually) lies within a wider tract of land, and that the assessment of landscape value should be made with regard to that wider tract – not the site in isolation.
- 2.16. In doing so, ZLA has elected to follow guidance presented within the Landscape Institute's Technical Guidance 02/21, entitled 'Assessing landscape value outside national designations', which serves the following purpose:

*'This technical guidance note (TGN) provides information and guidance<sup>1</sup> to landscape professionals and others who need to make judgments about the value of a landscape (outside national landscape designations<sup>2</sup>) in the context of the UK Town and Country Planning system. It is also intended to be of assistance to those who review these judgements, so that there is a common understanding of the approach.'*



- 2.17. This guidance advocates an assessment which follows Box 5.1 of the Guidelines for Landscape and Visual Impact Assessment (Third Edition), for which, the Landscape Institute's Technical Guidance 02/21 states:

*'GLVIA (V3) Box 5.1 is not intended to be an exhaustive list of factors to be considered when determining the value of landscapes, but to provide a range of factors and indicators that could be considered. This TGN is intended to be complementary to GLVIA version 3.'*

- 2.18. The criteria are: landscape quality and condition, conservation interest, scenic quality, recreational value, rarity, perceptual aspects, representativeness and associations. In the absence of any criteria for assessing the Area of High Landscape Value in the supporting Appendix 08 of the BNNP, Box 5.1 will be adopted by ZLA. A summary of ZLA's appraisal is provided below, and concluded at Section 4.

#### **Summary of Z:A's field-based appraisal**

- 2.19. ZLA's assessment of landscape value is included within Appendix ZLA 2. This assessment considers the wider parish area which forms the Brize Norton Neighbourhood Area, including land within control of the promoters. This assessment has followed the assessment criteria in the Box 5.1 of the Guidelines for Landscape and Visual Impact Assessment (Third Edition); see table ZLA 2.1 overleaf:



**Table ZLA 2.1: Summary of ZLA’s field-based appraisal for Landscape Value (as per Box 5.1, GLVIA, version 3), September 2023**

Factor	Definition	ZLA Observations
Natural Heritage	Landscape with clear evidence of ecological, geological, geomorphological or physiographic interest which contribute positively to the landscape	Site: Limited
		Context: Limited
Cultural Heritage	Landscape with clear evidence of archaeological, historical or cultural interest which contributes positively to the landscape	Site: Limited
		Context: Limited
Landscape Condition	Landscape which is in a good physical state both with regard to individual elements and overall landscape structure	Site: Limited
		Context: Limited
Association	Landscape which is connected with notable people, events and the arts	Site: None
		Context: None
Distinctiveness	Landscape that has a strong sense of identity	Site: Limited
		Context: Limited
Recreational	Landscape offering recreational opportunities where experience of landscape is important	Site: Very Limited
		Context: Very Limited
Perceptual (scenic)	Landscape that appeals to the senses, primarily the visual sense	Site: Limited to Very Limited
		Context: Very Limited
Perceptual (wilderness/ tranquillity)	Landscape with a strong perceptual value notably wildness, tranquillity and/or dark skies	Site: Limited to Very Limited
		Context: Limited
Functional	Landscape which performs a clearly identifiable and valuable function, particularly in the healthy functioning of the landscape	Site: Medium to Strong
		Context: Medium to Strong



2.20. The land surrounding Brize Norton village, within the designated Neighbourhood Area, is situated within the Local Character Areas - Open Limestone Wolds Estate Farmland and the Open Rolling Clay vale Village Farmland. As noted through our field-based assessment, there are local factors influencing landscape value of this area, many of which are also noted within the published landscape character assessment (see BNNP Appendix 08); these include:

- Agricultural intensification, which has led to the removal of natural vegetation cover and poor maintenance and loss of field boundaries;
- Degraded and lost hedgerows, poorly maintained and derelict stone walling falling into disrepair;
- Frequent intervisibility with the urban edge, built form and paraphernalia with Brize Norton and Carterton;
- Large scale agricultural barns can be visually dominant when located on roadsides; and
- Noise and visual intrusion of RAF Brize Norton especially where the field pattern is weak with extensive built form and paraphernalia with long range views across the extensive airfields with military planes; and
- Noise and incongruous built form degrading landscape tranquillity and perception of remoteness.



## CONCLUSION

### **Conclusions in Respect of Landscape Matter One**

In terms of the intrinsic value of the site, and its surrounding open countryside, it is common ground that there is no designatory status in landscape terms, nor is it proposed to have such status. There is reason to suggest an Area of High Landscape Value across the whole Parish area is inappropriate. This is due to the landscape across this area being varied, and having some significant landscape detractors, including RAF Brize Norton, the effects of air traffic, local road systems and the influence of existing urban areas.

While all landscapes have some intrinsic value, as recognised by the NPPF para 174 (b), I demur from the more detailed analysis of landscape value associated with GLVIA (V3) Box 5.1, that I there is no reason to support the BNNP's assertion that the 'parish lies within a locally designated Area of High Landscape Value.'

From our recent field-based assessment, ZLA has concluded that this matter is over stated by the BNNP, and should be reviewed in line with a respected assessment criteria to achieve an appropriate and accurate understanding of the Parish's landscape value.

In the absence of any criteria, or any evidence of assessment within the BNPP and its supporting Landscape Character Assessment (Appendix 08), the continuation of this local designation is mis-leading and lacks legitimacy. To enforce this local designation only serves to misinform the plan making process, and inappropriately influence decision making.

Land within the control of the promoters has no elevated value above the rest of the open countryside surrounding Brize Norton (to it north and south), that being undesignated landscape which does not meet the 'valued landscape tests'.

This matter should be reviewed by the Brize Norton Parish Council and further evidence provided to demonstrate their justification for their decision to locally designate an Area of High Landscape Value across the area of the Parish.



## APPENDIX 2: Landscape Value Appraisal

Table A.2: Landscape Value (based on ZLA's field-based assessment. September 2023) based on GLVIA version 3 Box 5.1 – Site Aea and its Context (north to south of Brize Norton)

Factor	Definition	ZLA Observations
Natural Heritage	Landscape with clear evidence of ecological, geological, geomorphological or physiographic interest which contribute positively to the landscape	<p>Site: Limited</p> <p>Large arable fields with limited ecological value. The surrounding hedgerows are degraded and gappy hedgerows with limited tree cover. Landscape fabric is common with limited natural assets.</p>
		<p>Context: Limited</p> <p>Limited natural habitat with land managed extensively for crop growing. The surrounding hedgerows are degraded and gappy hedgerows with limited tree cover. Occasional small woodland blocks. Landscape fabric is common with limited ecological value.</p>
Cultural Heritage	Landscape with clear evidence of archaeological, historical or cultural interest which contributes positively to the landscape	<p>Site: Limited</p> <p>Not situated within, or adjoining a Registered Park and Garden or Conservation Area. No Listed Buildings within the site. Public Rights of Way pass through the southern land parcel, with a very limited network of route beyond the site.</p>
		<p>Context: Limited</p> <p>Not situated within, or adjoining a Registered Park and Garden. Very limited number of Listed Building on the periphery of the Parish area or within the settlement of Brize Norton not open countryside. Limited network of Public Rights of Way.</p>
Landscape Condition	Landscape which is in a good physical state both with regard to individual elements and overall landscape structure	<p>Site: Limited</p> <p>Limited landscape fabric typical of the Open Limestone Wolds Estate Farmland with degraded hedgerows and limited tree cover. Field pattern is larger rather than medium to large, with limited pasture. This landscape is not rare and has a limited intactness. There are a number of obvious detractors including the built form and land use at Brize Norton.</p> <p>Limited landscape structure within the Open Rolling Clay vale Village Farmland, which across the south part of the site. This area is situated at the end of the run way and is adversely affected by associated airflight movement, as well as the impact of security fencing and gates, as well as airfield lighting external to the Brize Norton base.</p>
		<p>Context: Limited</p> <p>Noise and visual intrusion of RAF Brize Norton especially where the field pattern is weak and potential further development within the RAF site. These are significant incongruous features. Local roads are busy and often trafficked with associated noise.</p>
Association	Landscape which is connected with notable people, events and the arts	<p>Site: None</p> <p>None known. Not situated within, or adjoining a Registered Park and Garden. No promoted long distance walking route pass through the site.</p>
		<p>Context: None</p> <p>As above.</p>



Distinctiveness	Landscape that has a strong sense of identity	Site: Limited Weak and degraded landscape structure with limited ecological value due agricultural intensification. Obvious settlement edge along the western and northwestern edge of the site area, which overlooks the site. There are broad open views to the large scale built form at RAF Brize Norton which is incongruous.
		Context: Limited Weak landscape structure. Landscape fabric is degraded. Agricultural intensification has weakened the distinctiveness of the landscape through expansive fields.
Recreational	Landscape offering recreational opportunities where experience of landscape is important	Site: Very Limited No open access land, common land and limited number of Public Rights of Way pass through the site area. The site area is predominantly not accessible to the public and affords very limited recreational opportunities. There are no Long Distance Walking Routes/national Trails passing through or adjoining the site.
		Context: Very Limited As above. Public access to the south of the site is very limited due to RAF Brize Norton.
Perceptual (scenic)	Landscape that appeals to the senses, primarily the visual sense	Site: Limited to Very Limited Not a rare landscape. Views are broad and open (mainly due to undulating landform and the large scale field pattern through agricultural intensification). Landscape fabric is degraded with limited tree cover. There are extensive views of RAF Brize Norton with the site situated close to the run way. There is extensive built form at the base with large scale building and paraphernalia. Views are not protected, or elevated, through the Local Plan.
		Context: As above.
Perceptual (wilderness/tranquillity)	Landscape with a strong perceptual value notably wildness, tranquillity and/or dark skies	Site: Limited to Very Limited The impacts of RAF Brize Norton and aircraft. Western part of the site is overlooked by residential development on settlement edge of Brize Norton village, and local road network is frequently travelled.
		Context: Limited As above with a limited perception of tranquillity or remoteness.
Functional	Landscape which performs a clearly identifiable and valuable function, particularly in the healthy functioning of the landscape	Site: Medium to Strong Intensified agricultural character is prevailing with weakened landscape fabric is typically experienced across the site area.
		Context: Medium to Strong As above.





**Appendix C      Landscape Note 2**

## LANDSCAPE MATTER TWO: KEY LOCAL VIEWS

The BNNP has identified a number of ‘Key Local Views’.

There is no rationale for why the Parish Council has elevated the Key Local Views as a material consideration for appraising future development proposal.

ZLA notes, that within the BNNP, there is an absence of justifying the elevated protection which the BNNP is applying to these views, and the accompanying Appendix 09 of the BNNP, provides no assessment criterion by which these views are valued. Consequently, ZLA has undertaken its own field-survey to appraise the value, sensitivity and susceptibility of two of these views. This is undertaken to an appropriate criteria; see Appendix ZLA 3.

For ease of refence, ZLA continue to reference to these ‘key views’ numerically reflecting the study contained in Appendix 09. A summary of ZLA’s appraisal is provided below. Representative viewpoints from these locations are contained in Appendix ZLA 4.

### **Summary of ZLA’s field-based appraisal**

ZLA’s assessment of these key views is included within Appendix ZLA 3. This assessment considers the site being promoted, and the wider parish area which forms the backdrop of the site to the north and south of Brize Norton Village.

This assessment has included the sensory and perception elements from Box 5.1 of the Guidelines for Landscape and Visual Impact Assessment (Third Edition); see Appendix ZLA 3. A summary of ZLA’s appraisal is provided overleaf:



## CONCLUSION

### **Conclusions in Respect of Landscape Matter Two**

Given the foregoing, ZLA has appraised the Key Local Views (LCA Key Views) situated within the quantum of the site being promoted, or those situated around its context which are sighted to look across the land within the control of the promoters.

Given our own field-based assessment, ZLA concludes, that these views are typical of the environment surrounding Brize Norton, and within the wider open countryside between Carterton and Brize Norton, as well as that extending to outlying villages. In these situations, the common factor is the agricultural environment primarily of the Open Limestone Wolds Estate Farmland and Open Rolling Clay vale Village Farmland Landscape Character Areas.

Those features experienced in these views are typical of these host landscape character areas, and are not within Appendix 09, as being influenced by the degrading effects of agricultural intensification (which 'can lead to removal of natural vegetation cover and poor maintenance and loss of field boundaries') as well as the effects of RAF Brize Norton which is a dominant feature of this location (leading to 'noise and visual intrusion of RAF Brize Norton especially where the field pattern is weak).

In these instances, we are unsure the relevance of highlighting these views are those which should receive elevated consideration, and be protected from future development. This matter should be reviewed by the Brize Norton Parish Council and further evidence of how these key views were appraised and selected demonstrated as part of the consultation and development of the Brize Norton Neighbourhood Plan.

In its current form, Appendix 09 fails to demonstrate an appropriate approach for selecting Key View, as well as the purpose for their elevated consideration.



### APPENDIX 3: Appraisal of Key Local Views

Table A.3: Appraisal of Key Local Views Landscape Value for Viewpoints Highlighted by the BNNP. Appraisal undertaken in September 2023

LCA Key View 12/Key Local View D (see Appendix ZLA 4)

Factor	Definition	ZLA Observations
Landscape Condition	Landscape which is in a good physical state both with regard to individual elements and overall landscape structure	View across open countryside with a minor road network. The view has a sense of openness, but the existing landscape is degraded with missing hedgerows replaced by timber fencing.
Distinctiveness /Rarity of the landscape within the intervening environment	Landscape that has a strong sense of identity	Has an expansive character which is typical of the host landscape character area Open Limestone Wolds Estate Farmland with indications of agricultural intensification reducing the intactness of typical features. This reduces the distinctives of the landscape.
Recreational	Landscape offering recreational opportunities where experience of landscape is important	Limited public right of way network. No Long Distance Walking Routes/National Trails passing through the intervening environment. Limited cultural connections.
Perceptual (scenic)	Landscape that appeals to the senses, primarily the visual sense	Limited. Not scenic. This is a commonly experienced view from along the settlement edge of Brize Norton village. There are no broad long open views to the Cotswolds AONB. Rather views are of extensive and large agricultural fields which lack landscape structure with landscape fabric being of limited intactness.
Perceptual (wilderness/tranquillity)	Landscape with a strong perceptual value notably wildness, tranquillity and/or dark skies	Very limited. Urban edge influence
Functional	Landscape which performs a clearly identifiable and valuable function, particularly in the healthy functioning of the landscape	Typical hinterland of settlement edge and open countryside managed for arable crop production with degraded hedgerows and limited prevailing tree cover.
Landscape Value	National Landscape Designation / Local Landscape Designations / Open Countryside Undesignated	View from open countryside without any designatory status in landscape terms. View looking outward from Brize Norton village across agricultural fields having no statutory landscape designation.
<b>Summary: Value and Relevance of the View</b>	Medium value view. Typical hinterland of settlement edge and open countryside managed for arable crop production with degraded hedgerows and limited prevailing tree cover. There are no broad long open views to the Cotswolds AONB. Rather views are of extensive and large agricultural fields which lack landscape structure with landscape fabric being of limited intactness. ZLA finds no reason for this view to be protected as its neither rare or distinctive.	



LCA Key View 14/Key Local View E (see Appendix ZLA 4)

Factor	Definition	ZLA Observations
Landscape Condition	Landscape which is in a good physical state both with regard to individual elements and overall landscape structure	View across open countryside from a location close to well trafficked roadway. The view is broad and long giving a sense of openness. The landscape fabric within the view is degraded with gappy and missing hedgerows and limited tree cover between this location and the settlement of Brize Norton.
Distinctiveness /Rarity of the landscape within the intervening environment	Landscape that has a strong sense of identity	Has an expansive character which is typical of the host landscape character area Open Limestone Wolds Estate Farmland with indications of agricultural intensification reducing the intactness of typical features. This reduces the distinctives of the landscape.
Recreational	Landscape offering recreational opportunities where experience of landscape is important	Limited public right of way network. No Long Distance Walking Routes/National Trails passing through the intervening environment. Limited cultural connections.
Perceptual (scenic)	Landscape that appeals to the senses, primarily the visual sense	Limited. Not scenic. This is a commonly experienced view from the open countryside beyond Brize Norton and Carterton, and are of extensive and large agricultural fields which lack landscape structure with landscape fabric being of limited intactness.
Perceptual (wilderness/tranquillity)	Landscape with a strong perceptual value notably wildness, tranquillity and/or dark skies	Influence of roadway diminishes the sense of tranquillity and openness, which would diminish with distance from the roadway.
Functional	Landscape which performs a clearly identifiable and valuable function, particularly in the healthy functioning of the landscape	Typical hinterland of settlement edge and open countryside managed for arable crop production with degraded hedgerows and limited prevailing tree cover.
Landscape Value	National Landscape Designation / Local Landscape Designations / Open Countryside Undesignated	View from open countryside without any designatory status in landscape terms. View looking outward from Brize Norton village across agricultural fields having no statutory landscape designation.
<b>Summary: Value and Relevance of the View</b>	This view would have a medium to higher value, and its sense of openness is easily appreciated. This view is typical of that found outside of Brize Norton and Carterton, especially from outlying settlements on rising landform. There is a lack of landscape structure due to limited intactness.	



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## APPENDIX 4: Representative Key Local Views





WIDE ANGLE BASELINE ANORAMA OF EXISTING VIEW ACROSS THE DESIGNATED NEIGHBOURHOOD AREA



WIDE ANGLE BASELINE PANORAMA OF EXISTING VIEW ACROSS THE DESIGNATED NEIGHBOURHOOD AREA

LCA KEY VIEW 12/KEY LOCAL VIEW N: Existing view from Public Footpath (LPA PRoW ref: 143/6/10) situated within open countryside on the settlement edge of Brize Norton village

Grid Reference	X: 430290, Y:207319	Paper Size	420 x 297 mm A3
Elevation	83m AOD	Camera	Sony A7 II
Distance to nearest Site Boundary	Within the site	Lens	Sony E-mount E50mm F1.8oss
View Direction	NW/300 degrees	Projection	Cylindrical
		Photograph Date and Time	16/09/2023 @17.22

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ZLA 1500  
**Brize Norton**

**LCA Key View 12/ Key Local View N**  
September 2023



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WIDE ANGLE BASELINE PANORAMA OF EXISTING VIEW ACROSS THE DESIGNATED NEIGHBOURHOOD AREA

LCA KEY VIEW 14/KEY LOCAL VIEW O: Existing view situated from Brize Norton Road running from Brize Norton village to the outlying settlement of Minster Lovell to the north east

Grid Reference	X: 430082, Y:208109	Paper Size	420 x 297 mm A3
Elevation	113m AOD	Camera	Sony A7 II
Distance to nearest Site Boundary	Adjoining the site	Lens	Sony E-mount E50mm F1.8oss
View Direction	SW/225 degrees	Projection	Cylindrical
		Photograph Date and Time	16/09/2023 @16.19

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**Brize Norton**

**LCA Key View 14/  
Key Local View O**  
September 2023



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