

Planning Policy Team
Strategic Planning and the Economy
Cherwell District Council,
Bodicote House
Bodicote,
Banbury,
OX15 4AA

24th November 2017

Dear Sirs,

**For the Independent Examiner of the Adderbury Neighbourhood Plan
Consultation Period ending 24th November 2017**

Please find enclosed within this document the issues and concerns we wish to raise with the independent examiner for the submitted Adderbury Neighbourhood Plan March 2017.

We wish to commend most of what has been included within the Plan and whilst some of the concerns listed below have been stated to be included within a future all encompassing Parish Plan, their omission fails to provide clarity on the vision for Parishioners of Adderbury and how the land based policies support that vision .

Our comments are therefore set out as follows identified by page and paragraph reference.

Introduction and Background

Page 3 Para 4

The statement in Para 4 page 3 that the Neighbourhood Plan is required to focus on land base policies is not consistent with the NPPF/NPPG and CDC Planning Protocol. See attachments :- Para 184 NPPF, Page 2 NPPG ,pages 1,16 CDC Protocol

From the perspective of a District Council, ie, Planning Authority, their focus is certainly that of land development. However, if a Neighbourhood Plan focuses almost entirely on land development, as the Adderbury Neighbourhood Plan does, it does not provide a context for the community "vision". The NPPF allows for this context by defining the three dimension to achieve sustainable development viz. Paragraphs 7 & 8:

"7. There are three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles:

- an economic role – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;

- a social role – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and
- an environmental role – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.

8. These roles should not be undertaken in isolation, because they are mutually dependent. Economic growth can secure higher social and environmental standards, and well-designed buildings and places can improve the lives of people and communities. Therefore, to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system. The planning system should play an active role in guiding development to sustainable solutions."

Furthermore paragraphs 16 and 17 of the NPPF provide more detail of the more holistic approach to "how communities engage in neighbourhood planning".

A key factor is that all communities (parishes, villages and towns) have an identity of their own with their own visions and aspirations. The submission of a Neighbourhood Plan without considering the three dimensions (social, economic and environmental) ignores the community identity and leaves the vision without substance.

In fact, the Neighbourhood Plan is required to be supportive of the Cherwell District Local Plan which has taken account of these three dimensions. Omitting these dimensions in the Adderbury Neighbourhood Plan thus ignores the "fabric" of Adderbury that makes it a unique community thus leaving these aspects to the Planning Department of the District Council. If all Neighbourhood Plans within the Cherwell District Council boundary are bereft of the three dimensions, it will not be surprising if villages and towns begin to lose their individual character over time and have the same "look and feel".

Page 7 Sec 1.4

"NP can therefore only contain and use planning policies" is not correct because the environmental, economic and social implications with infrastructure needs require inclusion to enable Parishioners to see the clear vision and objectives of the plan and see then the context of planning policies demonstrating how they meet and shape the parish to achieve the vision and its objectives. Also See comments in above.

Para 7 sec 1.5

The need to be consistent with the strategic plan is stated in the NPPF. However, CDC did not provide an assessment of the needs within Adderbury itself but applied a need from a much wider

area allocating a rural housing 'need' across a number of villages in category A under Policy Villages 1. The recent High Court findings in 2017 where East Bergholt Parish Council brought a test case against Babergh District Council where the judge agreed with East Bergholt Parish Council interpretation that the needs of the local area are different to the wider District.

Neighbourhood Plan Area

Page 9 sec 2.4

This paragraph does not acknowledge the recent finding of pre-historic Neolithic features that indicated the existences of henges and settlements much earlier than Roman times possibly Neolithic / Bronze age. The archaeological survey work was carried by Cotswold Archaeology under condition 15 of planning approval 16/00518/DISC. This condition can only be discharged on receipt of the final report containing the final carbon dating evaluation but early indications suggest 2000BC.

.Planning Policy Content

Page 11 sec 3.2

Whilst the aims stated for the NPPF are all laudable, the plan requires vision and ambition and must demonstrate how each objective can be met. For instance, 'good design' must not merely focus on the height and massing of new developments, or even the building materials deployed, but must also demonstrate architectural flair and aesthetic appeal, so that new developments will age well and will be regarded as assets to the built environment. The aim should be that new developments have the potential to be regarded as the Listed Buildings of tomorrow. Policies should demand new developments to be of high quality and of architectural merit, regardless of the size and market value of the buildings constructed. Good design engenders a feeling of civic pride and helps to create strong and cohesive communities. Good design has not been evident in the majority of the new housing developments within the Parish over the course of the past 15 years as what has been delivered has, in the main, comprised houses of fairly generic, uniform design which appeal to a narrow section of the total market so that, just as the housing stock is un-diverse, so will be the inhabitants. There is little architectural variation nor any 'sense of place' provided by the new developments which are notable only for their mediocrity. The early inhabitants did not have NPPF or Planning Departments to guide them and were able to build up until the mid C20th a village noted for the quality, variety aesthetic and timeless appeal of its architecture which has been successfully adapted to fit with modern-day styles of living.

Page 11 sec3.4

Policy BSC 03 should the word "expected" be altered to reflect the word "shall".

Page 12sec3.6

whilst the CLP does have these policies, how for example does the S28 Policy actually solve the problem of the village shop when no vision is provided on how this need will be catered for in the future. Perhaps the policy is to rely on Sainsbury's (in Banbury) or the Co-Op stores in Deddington or Bloxham and leave the present shop to struggle because of its size and lack of parking facilities?

Perhaps Adderbury is not capable of supporting a shop. This raises the question as to whether Adderbury is, at all, a sustainable location for further development as, compared to Bloxham and Deddington, it has a limited range of local shopping / health care amenities. Realism is required if we wish to have improved shopping facilities in Adderbury although the Plan does not set out any idea as to how such local amenities will be improved and additional amenities can be delivered. Provision of additional housing has not led to any improvement in the provision of local shopping amenities. What has been witnessed is an inverse correlation between the viability of the shop and, arguably, the local pubs as the village has grown in housing number and population.

Page 14 sec 4.3

the statement ***"a chance to address important aspects of village, life through the Plan, for the future"*** is meaningless, if the plan does not contain the vision with objectives (Economic, Social and Environmental) followed by land development policies providing the means to achieve the stated vision.

Page 16 section 5.1

"To continue as a thriving, modern, viable and sustainable rural village for work, rest, and play" is a well meant sound bite but lacks any flesh on the bone and does not deal with other aspects of village life before the land development describes how planning policies will effect those changes.

"New homes have helped meet local housing needs and have enabled investment in improving local facilities". This statement is dubious. The recent housing developments have largely sought to satisfy the housing aspirations of citizens from outside Adderbury (in some cases from far beyond Adderbury) and have not necessarily (and have certainly not been focussed on) satisfying village needs (such as they may exist).

"These schemes have been well-designed to ensure the rural character of the village has been preserved". This statement is one that a large section of the community will disagree with. In fact, the poor design and architectural appeal of some of the new developments has attracted considerable negative comment from within the village and beyond. There is a widely held feeling that recent developments are undistinguished, generic and do not complement or enhance the architecture of the older parts of the village or the rural setting of the village.

Page 16 sec 5.2

"To manage the incremental growth of the village through sensitive infill and to protect the surrounding countryside from harmful development" The recent appeal on land west of Horn Hill Rd appears to have driven a coach and horses through the settlement boundary policy and whilst the plan is not yet made, the application was supported by some Parish Councillors who were taking part in preparing the plan. In the Hook Norton appeal APP/C3105/A/14/2226552, even though a Neighbourhood Plan was made and Cherwell District Council had a five year supply at the time of the Secretary of State's review, additional housing was approved against the wishes of the Community.

Page 16 sec 5.3

"The policies aim to deliver the objectives of the Neighbourhood Plan, and are to be used in determining the outcome of planning decisions affecting Adderbury Parish. For this reason, there are many other public policy matters that cannot be addressed by the Plan, notably in respect of traffic management initiatives" This statement does not appear to be consistent with the NPPF, NPPG and CDC planning protocols in that the plan can consider policies affecting infrastructure needs, e.g. traffic management, retail developments. The plan should set out a clear vision and objectives to meet the aspirations of Parishioners. Should traffic speeds and pattern of flows be influenced and should the accessibility to a convenient and a better resourced shopping facility more suited to modern life styles be enabled and supported by land based policies

Page 17 sec5.5

"The policies are intended to assist in the delivery of appropriate residential, commercial, community, agricultural and other development. They seek to encourage planning applications for things the local community wants to see happen, and discourage applications for developments that they do not want to happen. They will also be used to establish the principles for changing or retaining land use and to set out the conditions against which development proposals will be judged in terms of their design, access, etc." This sounds quite plausible but it is misleading in that a recent planning appeal followed by planning application 17/00588/F has breached the settlement boundary policy AD1.

Page 17 - Policy AD1: Adderbury Settlement Boundary

"... there is a presumption in favour of local landscape protection and enhancement. Proposals for changes of use and development will therefore only be supported if it can be demonstrated they are consistent with that principle."

However, recent evidence suggests this is not the case following the appeal on land west of Horn Hill Rd in respect of an application supported by some Parish Councillors which breached the settlement boundary principle. Parishioners need to be provided with an explanation of why an offer, dressed up as providing some benefit to the community, clearly gives the impression that planning applications can easily be 'bought' by well-resourced applicants, even if the application is clearly in breach of a key component of the Plan.

Page 18 sec 5.8 – 5.11

The application West of Horn Hill Rd demonstrated how an application can breach the settlement boundary. A consequence of the breach of the settlement boundary principle is that other land outside the settlement boundary may be regarded as developable when the Plan's intention is that, for varying reasons, they should not be. For instance, the failure to apply the Settlement Boundary exposes land to the west of the Banbury Rd to a risk. This is, arguably, the most prominent strategic piece of land in the village which, because it is in close proximity to the centre of the village, needs to be protected. This is key to understanding the setting of the historic core of the village which requires policies to ensure its future use continues as open agricultural land.

A review of the of the plan based on a change to the District's housing supply strategy may lose what protection the village feels it has sought to obtain in this Neighbourhood Plan and land west of Banbury Rd may well be seized upon by developers for further housing. The Neighbourhood Plan at Hook Norton whilst, not embodying a Settlement Boundary, was breached at appeal, shortly after being made. What this suggests that even with a plan there is little protection therefore careful consideration of protecting an important strategic site is required.

See comments included within Page 18 sec 5.8-5.11

Page 32 - Policy AD17: Locally Listed Buildings

The Neighbourhood Plan identifies the following buildings and structures as Locally Listed Buildings by way of their local architectural or historic interest:

- The Crescent, Twyford***
- The Pump House Garage***
- The Walled Lambing Paddock, Aynho Road***
- The Pound, Hornhill Road***
- The Ice House, Adderbury Lakes***
- The Long Wall, Long Wall Path***
- Twyford Tea Gardens, Banbury Road***
- The Friends Meeting House, Hornhill Road***
- The Well, Hornhill Road***
- The Canal Bridge, Twyford Road***

The finding of evidence of Pre-Historic settlements including Henges and cremation facilities on land North Of Milton Rd needs careful consideration and further exploration needs to determine whether further evidence of the earliest civilisation Henges and possibly Barrows exist in Adderbury North of Milton Rd . Accordingly, listing should follow to preserve for future generations whatever evidence is uncovered. Evidence of the findings on the archaeological survey carried on the development site North of Milton, carried by Cotswold Archaeology under condition 15 of planning approval 16/00518/DISC. This condition can only be discharged on receipt of the final report containing the final carbon dating evaluation but early indications suggest 2000BC.

Page 33 sec 5.58

"Proposals for buildings and any floodlighting must avoid or minimise their impacts on the established amenities enjoyed by the neighbouring residential and employment properties. A 2016 leisure survey of Adderbury households identified multiple uses with preference being given for a large community centre, football pitches and part woodland on the site. Once the Neighbourhood Plan is made, the Parish Council will seek to bring forward proposals on both sites and other appropriate locations for the mix and configuration of such uses and for their financing." Floodlighting of the proposed sports ground should be resisted. Only if there is a very high level of explicit support for the installation of floodlighting from the residents of adjacent and nearby houses in West Adderbury, should a development proceed. Light pollution should be avoided at all costs as it is detrimental to existing neighbours' enjoyment of their own homes and will negatively impact the setting of the Conservation Area and Listed Buildings within it.

Page 35 – " Development proposals to expand existing shops or commercial premises as well as to create new shops or commercial uses will be supported." This policy is fine in that it supports proposal to support existing shops and commercial premises

however it does little else to address the issues surrounding the present general food shop which is hampered by its location ,lack of parking and size and unless there is a clear vision the residents will continue to drive to Sainsbury's, Deddington or Bloxham's Co- Op.

Page 35

"Development proposals to expand existing shops or commercial premises as well as to create new shops or commercial uses will be supported." This policy is fine in that it supports proposal to support existing shops and commercial premises however it does little else to address the issues surrounding the present general food shop which is hampered by its location, lack of parking and size and unless there is a clear vision the residents will continue to drive to Sainsbury's, Deddington or Bloxham's Co-Op outlets exist with parking. See also comments above with reference to **Page 12 sec 3.6**

Page 38

Infrastructure Projects

6.5 The Parish Council proposes some or all of the following projects for investment of future community infrastructure levy funding allocated by the local planning authority to the Parish:

- *Improving Cycle safety and connectivity of off-road cycleways*
- *Maintaining heritage assets*
- *Funding of Adderbury Library services*
- *Leisure requirements determined by outcome of questionnaire*
- *Provision of land for use as a cemetery*

The provision of Land for the for use as a cemetery does not indicate any urgency or clarity of vision on what, where and when we can meet our obligations to provide a burial site that meets planning material considerations, and no evidence has been provided based on the need and the capacity of the present site in Horn Hill Rd. Tests have not been carried out to determine the extent of the groundwater problem within the existing cemetery and no estimate of future need has been evidenced. Recent criticism of the closeness of graves and inadequate spacing not allowing for stable installation of headstones has been voiced. The British Register of Accredited Memorial Masons publish what they term "The Blue Book" which gives guidance that a space of 600mm is allowed beyond the actual grave for the stable installation of headstones. See attachments.

Signatories

Ian Asbury
Colin Astley
Stephen Betts
Penny Clarke
Ian Jelfs
Tony Gill

- set planning policies through neighbourhood plans to determine decisions on planning applications; and
- grant planning permission through Neighbourhood Development Orders and Community Right to Build Orders for specific development which complies with the order.

184. Neighbourhood planning provides a powerful set of tools for local people to ensure that they get the right types of development for their community. The ambition of the neighbourhood should be aligned with the strategic needs and priorities of the wider local area. Neighbourhood plans must be in general conformity with the strategic policies of the Local Plan. To facilitate this, local planning authorities should set out clearly their strategic policies for the area and ensure that an up-to-date Local Plan is in place as quickly as possible. Neighbourhood plans should reflect these policies and neighbourhoods should plan positively to support them. Neighbourhood plans and orders should not promote less development than set out in the Local Plan or undermine its strategic policies.
185. Outside these strategic elements, neighbourhood plans will be able to shape and direct sustainable development in their area. Once a neighbourhood plan has demonstrated its general conformity with the strategic policies of the Local Plan and is brought into force, the policies it contains take precedence over existing non-strategic policies in the Local Plan for that neighbourhood, where they are in conflict. Local planning authorities should avoid duplicating planning processes for non-strategic policies where a neighbourhood plan is in preparation.

Local communities can choose to:

- set planning policies through a neighbourhood plan that is used in determining planning applications.
- grant planning permission through Neighbourhood Development Orders and Community Right to Build Orders for specific development which complies with the order.

Neighbourhood planning is not a legal requirement but a right which communities in England can choose to use. Communities may decide that they could achieve the outcomes they want to see through other planning routes, such as incorporating their proposals for the neighbourhood into the Local Plan (<https://www.gov.uk/guidance/local-plans--2>), or through other planning mechanisms such as Local Development Orders (<https://www.gov.uk/guidance/when-is-permission-required#Local-Development-Order>) and supplementary planning documents (<https://www.gov.uk/guidance/local-plans--2#monitoring-report>) or through pre-application consultation on development proposals. Communities and local planning authorities should discuss the different choices communities have to achieving their ambitions for their neighbourhood.

Paragraph: 002 Reference ID: 41-002-20140306

Revision date: 06 03 2014

What are the benefits to a community of developing a neighbourhood plan or Order?

Neighbourhood planning enables communities to play a much stronger role in shaping the areas in which they live and work and in supporting new development proposals. This is because unlike the parish, village or town plans that communities may have prepared, a neighbourhood plan forms part of the development plan and sits alongside the Local Plan (<https://www.gov.uk/guidance/local-plans--2>) prepared by the local planning authority. Decisions on planning applications will be made using both the Local Plan and the neighbourhood plan, and any other material considerations.

Neighbourhood planning provides the opportunity for communities to set out a positive vision for how they want their community to develop over the next 10, 15, 20 years in ways that meet identified local need and make sense for local people. They can put in place planning policies that will help deliver that vision or grant planning permission for the development they want to see.

To help deliver their vision communities that take a proactive approach by drawing up a neighbourhood plan or Order and secure the consent of local people in a referendum, will benefit from 25% of the revenues from the Community Infrastructure Levy arising from the development that takes place in their area.

Communities without a parish or town council will still benefit from this incentive. If there is no parish or town council the charging authority will retain the Levy receipts but should engage with the communities where development has taken place and agree with them how best to spend the neighbourhood funding. Charging authorities should set out clearly and transparently their approach to engaging with neighbourhoods using their regular communication tools eg website, newsletters, etc. The use of neighbourhood funds should therefore match priorities expressed by local communities, including priorities set out formally in neighbourhood plans.

Paragraph: 003 Reference ID: 41-003-20140306

Revision date: 06 03 2014

What is a neighbourhood plan and what is its relationship to a Local Plan?

What should a Neighbourhood Plan address?

A neighbourhood plan should support the strategic development needs set out in the Local Plan and plan positively to support local development (as outlined in paragraph 16 of the National Planning Policy Framework (<https://gov.uk/guidance/national-planning-policy-framework/achieving-sustainable-development/#para016>)).

Neighbourhood Planning

An illustration of three blue houses and a green tree, positioned to the right of the title.

Protocol for Preparing Neighbourhood Plans

February 2012

Cherwell
DISTRICT COUNCIL
NORTH OXFORDSHIRE

1. Introduction

- 1.1 The Government's Localism Act introduces new rights and powers for communities and individuals to enable them to get more involved in planning for their areas. Neighbourhood planning will allow communities to come together through a local parish council and say where they think new houses, businesses and shops should go – and what they should look like. Specifically the Act sets out proposals around community led plans (Neighbourhood Development Plans) to guide new development and in some cases granting planning permission for certain types of development. In addition the Act proposes a sub category of Neighbourhood Development Orders called Community Right to Build Orders. These will provide for community led site development.
- 1.2 Neighbourhood development plans could be very simple, or go into considerable detail where people want. Local communities would also be able to grant full or outline planning permission in areas where they most want to see new homes and businesses, making it easier and quicker for development to go ahead (Neighbourhood Development Orders). The Government is clear that the purpose of Neighbourhood Plans is about building neighbourhoods and not stopping growth.
- 1.3 Neighbourhood planning is optional but if supported by the Local Planning Authority (LPA) a Neighbourhood Plan and Orders will have weight becoming part of the plan making framework for the area and a main consideration within the planning system. The Localism Act was published in December 2010 and recently received Royal Assent.
- 1.4 Cherwell District Council and other local authorities have been starting to gear themselves up to work with Parishes and community groups on such plans. Cherwell District Council is working with Wroxton Parish Council on a Neighbourhood Plan which was awarded funding by DCLG in June 2011. Also Cherwell District Council and Banbury Methodist Church together secured First Wave Neighbourhood Planning Frontrunner Status to bring pockets of land and empty properties into use for community led housing. Specifically the two organisations will work with the community to use a Local Development Order as a tool to develop a site for a small self build housing scheme.

2. Neighbourhood Planning

- 2.1 Whilst a Neighbourhood Plan provides the opportunity for local communities to directly shape the development of the area in which they live there are a number of important considerations that also need to be taken into account when considering such an approach.
- 2.2 A Neighbourhood Plan will need to:
 - Be led by a Parish Council and only relate to one neighbourhood area;
 - Specify the period for which it will have effect;
 - Be supported by the District Council;

- Organising informal discussion groups
- Holding public meetings or drop-in events
- Publishing information in the local newsletter/magazine/website and providing an address to receive people's feedback;

(iii) Sustainability Appraisal process.

The Government has advised that part of the legal requirement for a planning document is the preparation of a Sustainability Appraisal (SA) which is required in order that they become part of the adopted development plan for an area. Neighbourhood Plan steering groups should be aware that the sustainability appraisal will need to be planned for early on in the process. UK guidance suggests that social and economic impacts of plans should also be assessed.

Sustainability Appraisal

What is sustainability?

Sustainability is defined as being "about treating the earth as if we intended to stay and making sure that future generations inherit the earth in a good state".

What is Sustainability Appraisal?

Sustainability appraisal is a process of ensuring that decisions are taken which balance economic, social and environmental factors for positive benefit. Sustainability Appraisal (SA) looks at the possible economic, environmental and social impacts of an emerging plan in order to promote sustainable development. This results in a final plan which has the least negative impact possible in an area. Sustainability Appraisal (SA) is a compulsory requirement under the 2004 Planning and Compulsory Purchase Act and the 2001/42/EEC European Directive. You can be legally challenged for not carrying out an SA where one is required.

What is the Sustainability Appraisal Framework?

The Sustainability Appraisal Framework is made up of objectives, indicators and targets tailored to the key sustainability issues for this District. Planning policies are looked at under these targets and indicators in order to understand how they will contribute towards the sustainable development of the Area.

The steps of 'sustainability appraisal' (SA) are basically the same as good plan-making. It is important that the appraisal is started when work starts on the plan (ie developing draft policies and content), so that *emerging* ideas, content and policies can be assessed, in order to inform the final plan. If the sustainability appraisal is done too late, it will not be able to inform the final plan (increasing the risk of a legal challenge at a later stage).

Appropriate Assessment follows a similar principle and this is something that may be relevant to certain Neighbourhood Plans. This specifically considers the wider impacts of particular emerging policies and plans on European sites of ecological importance (Natura 2000 sites) within the area.

The Sustainability Appraisal and Appropriate Assessment need not be complicated, but should be carried out by someone independent of the Neighbourhood Plan process. They can either be

written by a local resident or a planning consultant with support from the District Council.

What are the main stages of Sustainability Appraisal?

There are 5 stages to the SA process:

Stage A

Setting the context, objectives, baseline and scope for the SA (Scoping Stage). This stage highlights how planning policies will be appraised, and is set out in what is called the Scoping Report.

The gathering of baseline information is similar to the information gathering stage of the Neighbourhood Plan process and involves identifying what is in your neighbourhood, what is important for local residents, and how these things might change in the future without your plan. The legislation suggests that the SA should describe the 'baseline environment' in your neighbourhood. The baseline can include:

- Air quality and noise
- Archaeology and cultural heritage
- Biodiversity, flora and fauna
- Crime and community safety
- Education and training
- Energy and climatic factors
- Health and well-being
- Labour market and economy
- Landscape and townscape
- Material assets
- Population
- Social deprivation
- Soil, geology and land use
- Waste
- Water

Stage B

Developing and refining plan options. This stage uses the framework set out in the Scoping Report to appraise planning policy options. The SA Commentary Report will highlight which option is most sustainable and also how it can be improved.

Stage C

Appraisal of the social, economic and environmental effects of the plan. This stage is similar to Stage B, it appraises the preferred planning policy and will state if the policy could be improved to be more sustainable. This is set out in a document called the Sustainability Appraisal Report.

Stage D

Consulting on the plan and the SA Report - At this stage we will ask people if they think the SA is correct, or if they think the policy could be made more sustainable.

Stage E



British Register of Accredited Memorial Masons

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THE BLUE BOOK

Complying with BS 8415:2005+A2:2012

The reference guide for

Memorial Masons & Cemetery Personnel

Updated December 2015

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Technical Drawing

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