

West Oxfordshire District Council  
Woodgreen Offices  
New Yatt Road  
Witney  
OX28 1NB

18<sup>th</sup> February 2026

Dear Sir/Madam

**REGULATION 16 SUBMISSION: DRAFT STONESFIELD NEIGHBOURHOOD PLAN  
OBJECTION ON BEHALF OF [REDACTED]**

Planning Prospects Ltd (PPL) submit this representation to object to the proposed Local Green Space (LGS) designation of land referred to as “Field to the east at the top of Brook Lane”, under Policy SEL4 of the Draft Stonesfield Neighbourhood Plan (DSNP).

The LGS designation is not justified and contradicts key national policy tests. Further, the recent planning appeal decision (APP/D3125/W/25/3363544) that was issued on 1 December 2025, which granted Permission in Principle (PiP) for a self-build single dwelling, provides site-specific findings that contradict the assertions made within the DSNP at Appendix C – Stonesfield Local Green Spaces.

Firstly, the NPPF makes clear that Neighbourhood Plans form part of the development plan and must be prepared in accordance with national policy. Paragraph 13 requires them to “*support the delivery of strategic policies*” and “*shape and direct development*” consistently with the wider strategy. Paragraph 16 further requires plans to be “*shaped by early, proportionate and effective engagement...*” (16(c)), contain “*clearly written and unambiguous policies*” (16(d)), and to “*serve a clear purpose*” (16(f)). Within the DSNP, Policy SEL4 provides no site-specific assessment or transparent methodology explaining why the “Field to the east at the top of Brook Lane” meets the criteria for a LGS designation set out in paragraph 107 (see below).

Paragraph 107 of the NPPF reads as:

*“The Local Green Space designation should only be used where the green space is:*

- a) in reasonably close proximity to the community it serves;*
- b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and*
- c) local in character and is not an extensive tract of land.”*

The following objections have been formed against the information presented in the DSNP at Appendix C: Stonesfield Local Green Spaces:

1. No Public Access or Community Use – Appendix C acknowledges that the Site is private land with no public footpaths or public access. The Inspector, following a detailed on-site assessment of the Site’s character, visibility and use, confirmed this position, stating: “*The proposal site is in private ownership and there is no evidence before me to demonstrate a public right of access or recreation use.*”. This lack of public interaction

means the Site serves no community function and cannot hold particular local significance under Paragraph 107(b). Moreover, the absence of access also directly undermines any reliance on Paragraph 107(a), whereby while the land may physically lie on the edge of the village, proximity alone does not create community value where there is no ability for residents to experience the space, either physically or visual. Therefore, the reasoning cannot satisfy the overall test for the LGS designation.

2. Planning History – Although Appendix C mentions the refused application (ref: 24/02390/PIP) from October 2024, it does not acknowledge that this application was granted on appeal (APP/D3125/W/25/3363544) in December 2025. The Appeal Inspector concluded that the Site is suitable for sustainable residential development and meets a local housing need under Local Plan Policies BC1, OS2 and H2.

Designating the same land as LGS would directly conflict with this extant permission. Where the Neighbourhood Plan thought it was a material consideration to mention the previously refused application, it is at least as material to mention and recognise that that decision of the Council was overturned on appeal and the site now benefits from a Permission in Principle which the owners are now actively bringing forward through the final Technical Details Stage.

3. Size, Scale and Local Character - Appendix C argues that the land forms part of *“the enclosures immediately on the edge of the village”*. The Appeal Inspector suggests that the Site does not possess any exceptional landscape qualities in terms of size, scale or local character. The Inspector stated that the Site *“forms a logical complement to the existing scale and pattern of development...”* and that its *“large plot size is befitting of its village fringe location.”*. These findings show that the land is an ordinary component of the settlement edge, not a uniquely important or small-scale local space, and therefore it does not meet the requirement for a LGS designation.
4. Views from Brook Lane – Appendix C highlights proximity to the built environment and visibility from public viewpoints such as Brook Lane. The Inspector’s assessment contradicts Appendix C’s claims and says *“views within the site from along Brook Lane would be fleeting.”*. The Inspector’s use of the word *“fleeting”* indicates that any glimpse of the Site is incidental and easily missed, rather than forming part of any meaningful or valued public view. The Inspector’s wider findings also confirm that the views of the Site are significantly restricted by dense tree cover, boundary vegetation and the surrounding topography, resulting in only fleeting or distant glimpses from all relevant public viewpoints. The absence of any clear or appreciable public views also prevents the Site from being considered *“demonstrably special”* under NPPF 107(b), as the community cannot see, appreciate or value the land in any substantive way.
5. “Demonstrably Special” Land – Appendix C, Section 5 makes several claims about the land being “demonstrably special to a local community”. These claims alongside our evidence are listed below:
  - Views of the village from Akeman Street – Appendix C’s reference to *“views of the village from Akeman Street”* does not relate specifically to the Site, nor does it demonstrate that the land itself contributes to any valued public viewpoint. Akeman Street is approximately two miles from the Site, far beyond the distance at which the land could be visually distinguished or appreciated in any meaningful way. This is reinforced by the Appeal Inspector’s findings that even from much closer locations, including Brook Lane and nearby public rights of way, views of the Site are only *“fleeting”*, *“very limited”*, or *“effectively restricted”* due to topography, tree cover and boundary vegetation. These conclusions show that the Site plays no identifiable role in any long-distance view and cannot be considered *“demonstrably special”* based on visibility from Akeman Street.
  - Views of the Village from bridleway 212/1/10 from North Leigh Roman Villa - Similar to the above, Appendix C’s reliance on public rights of way does not withstand the Inspector’s findings. Along Brook Lane/PRoW 312/1/20, a dense tree line largely restricts views and any glimpse is *“fleeting”*. From the Oxfordshire Way/PRoW 370/2/10, the Inspector found only *“very limited views”* and, further along, that views are *“effectively restricted”* by intervening landform and tree groups. Taken together, this demonstrates that the Site is not consistently perceived from public routes. In any event, a viewpoint

nearly three miles away on PRoW 212/1/10 cannot establish the local significance required for LGS designation or show that the Site itself plays an identifiable role within that distant landscape.

- Enclosures Immediately on the Edge of the Village – As set out at Point 3: Size, Scale and Local Character, the Inspector stated that the Site “forms a logical complement to the existing scale and pattern of development” and that its “large plot size is befitting of its village fringe location.”. These findings undermine Appendix C’s claim that the land is one of the “enclosures immediately on the edge of the village”, showing it is an ordinary part of the settlement edge rather than a distinctive or sensitive enclosure. By contrast, the Inspector describes the land as “forming part of a wider grassed field...” confirming that this characteristic is shared by many fields and does not demonstrate local significance.
- Proximity to Landscape Designations – Appendix C points out that the Site is within the Upper Thames Tributaries ESA and adjacent to a Conservation Target Area (CTAs) however, the reliance on these do not assist with an evidenced LGS designation. Proximity to an ESA or CTA does not establish community value, public experience, or any site-specific qualities of the type required by the NPPF. Consequently, the point carries no weight in supporting an LGS designation.
- Survey Support - While Appendix C highlights that 86.1% of survey respondents supported the proposed designation, levels of public support cannot, by themselves, satisfy the policy tests for LGS designation.

In summary, the designation of this land as LGS is not justified in accordance with the NPPF and, importantly, conflicts with the recent Appeal Decision. For these reasons, “Field to the east at the top of Brook Lane” should be removed from Policy SEL4 of the DSNP as there is no justification for the plan to be made with this site designated as LGS. If there is any doubt over this matter, we would be willing to provide further clarification and explanation should the appointed Examiner hold any Hearing sessions.

Yours faithfully



**Kathryn Paterson – Planner**  
**For and on behalf of Planning Prospects Ltd**