



## BLenheim ESTATE

31<sup>st</sup> January 2025

[REDACTED]  
Stonesfield Parish Council  
Stonesfield Village Hall  
Field Close  
Stonesfield  
OX29 8HA

**Sent via E-mail only**

Dear [REDACTED]

### **Stonesfield Neighbourhood Development Plan - Local Green Space**

Thank you for your letters dated 6<sup>th</sup> December notifying the Blenheim Estate of the Parish Council's intentions with regards four proposed areas of Local Green Space in the Stonesfield Neighbourhood Plan. The areas include The Paddocks, Land south of William Buckland Way, The Dene at Laughton Hill and the Allotments. Please note that the land at the Paddocks is not owned by the Blenheim Estate.

We are supportive of neighbourhood planning and we are keen to see the making of a successful Stonesfield Neighbourhood Plan. We would like to take this opportunity to express our support for the proposed designation of the allotments and land at Laughton Hill as appropriate areas of Local Green Space that meet the relevant national policy tests.

In this regard and as you are no doubt aware, Paragraph 106 of the NPPF requires Local Green Space designations to be consistent with the local planning of sustainable development and complement the delivery of sufficient homes, jobs and other essential services. Whilst there is no requirement for neighbourhood plans to allocate land for development, it is a basic condition that neighbourhood plans must contribute to the achievement of sustainable development.

West Oxfordshire District Council is in the process of developing a new Local Plan. The Council does not have a 5 Year Housing Land Supply and further to changes in national policy regarding housing requirements, it must provide for significantly more housing land than previously anticipated. Settlements across the District, including those within the Cotswolds National Landscape, will need to contribute to the delivery of the affordable and market housing required in West Oxfordshire.

Various constraints to development mean that there are only limited opportunities to provide for sustainable growth in and around Stonesfield. One such opportunity potentially exists on land to the south of William Buckland Way, where there is clearly



## BLenheim ESTATE

scope for the sustainable development of a limited number of affordable and market dwellings that can appropriately contribute to the settlement's housing needs.

Given this, the proposed designation of a Local Green Space at [REDACTED] [REDACTED] proposed, does not appear to be consistent with the local planning of sustainable development. Further, it appears to seek to prevent, rather than to complement investment in sufficient homes.

Concerningly, as there is no suggestion that the Neighbourhood Plan will be seeking to allocate land and thus identify alternative locations for the delivery of much-needed affordable and market housing, the proposed designation of Local Green Space at William Buckland Way appears to run the significant risk of preventing the neighbourhood plan from contributing to the achievement of sustainable development.

As a [REDACTED] order to be made (or adopted), neighbourhood plans must meet all of the basic conditions. In the interest of its successful progress, we would therefore recommend that the Parish Council re-thinks its approach in respect of seeking to designate land to the south of William Buckland Way as Local Green Space.

In this regard, as well as focusing Local Green Space designations on sites that pass the national policy tests, there is also the opportunity for the Neighbourhood Plan to consider the inclusion of policies that seek to control the type of sustainable development that the settlement requires. The Neighbourhood Plan need not include development land allocations to achieve this but could introduce policies covering a wide range of matters, including design, infrastructure, local amenities and so on. In this way, the Neighbourhood Plan can look to plan for and control sustainable development over the plan period.

I hope the above is helpful, and we look forward to engaging with the Stonesfield Parish Council.

Yours sincerely

**Ashley Maltman MRTPI**  
**Head of Planning**

# Stonesfield Parish Council

Stonesfield Village Hall, Field Close, Stonesfield, OX29 8HA

Email: [clerk@stonesfieldpc.uk](mailto:clerk@stonesfieldpc.uk)

Mr Ashley Maltman, MRTPI,  
Head of Planning,  
Blenheim Estate,  
Woodstock,  
Oxfordshire OX28 1PP.

Email: [estate@blenheimpalace.com](mailto:estate@blenheimpalace.com)

1 October 2025

Dear Mr Maltman,

**Stonesfield Neighbourhood Plan – possible designation of land owned by Blenheim Estate as a Local Green Space: (1) Paddocks south of Witney Lane, (2) Land south-east of William Buckland Way (3) The Dene (4) Woodstock Road allotments.**

Thank you for your written representations of 31 January 2025 on behalf of the Blenheim Estate in response to my letter of 6 December 2024. I am sorry for the delay in replying to those. That has been occasioned largely because of the very considerable work it has been necessary to do in giving careful consideration to the several representations made by owners of all the parcels of land proposed for designation, deciding what action should be taken in the light of those representations and drafting responses. That work is time-consuming and we are reliant upon the goodwill and unpaid work of volunteers to assist us in preparation for deliberations by parish councillors.

We note your indication you are not the landowner of the fields south of Witney Lane. We have now communicated with those who have informed us they are the owners.

We are pleased that you support the designation of the The Dene and the Woodstock Road allotments. Thank you for your support.

I attach/enclose a note of the Parish Council's consideration of your submissions about the land south-east of William Buckland Way, of its determinations and the reasons for those determinations.

Yours sincerely,



*Chair of Stonesfield Parish Council.*

## Parish Council response

22 March 2025.

### **Consideration of representations resisting designations as Local Green Spaces.**

The field south-east of William Buckland Way (“the WBW Land”) – Representations dated 31 January 2025 by Blenheim Estate (“the Blenheim WBW Representations”).

The Stonesfield Parish Council (“SPC”) has carefully considered the Blenheim WBW Representations and its consideration and conclusions are summarised as follows.

The designation of this land and indeed other land by the draft Neighbourhood Plan as a Local Green Space is based on perceived satisfaction of the three conditions required by paragraph 107 of the National Planning Policy Framework (“NPPF”) to be fulfilled before land is designated, i.e. land designated must be: –

- a. in reasonably close proximity to the community it serves;
- b. demonstrably special to the local community and hold 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 not an extensive tract of land.

The Parish Council does not understand the Blenheim WBW Representations to bring into issue satisfaction of any of the three conditions, i.e. “close proximity to the community” and “local in character and ... not an extensive tract of land.” The Representations focus rather upon: –

- i. the potential contribution of development on the WBW Land to the 5 Year Housing Land Supply within West Oxfordshire and
- ii. “scope for the sustainable development of a limited number of affordable and market dwellings that can appropriately contribute to the settlement’s housing needs.”

Appendix C of the draft Neighbourhood Plan sets out in detail why SPC considers the three conditions required by paragraph 107 of the NPPF are fulfilled and therefore the justification will not be repeated here, except insofar as it relates to the Housing Land Supply and sustainable development contentions of the Blenheim WBW Representations.

### **Housing Land Supply.**

Blenheim asserts that

- A. West Oxfordshire District Council “does not have a 5 Year Housing Land Supply and further to changes in national policy regarding housing requirements, it must provide for significantly more housing land than previously anticipated;”
- B. “Settlements across the District, including those within the Cotswolds National Landscape, will need to contribute to the delivery of the affordable and market housing required in West Oxfordshire.”

Stonesfield is in what is, by statutory designation, the Cotswolds Area of Outstanding Natural Beauty (“AONB”). The Blenheim WBW Representations refer to this as the Cotswolds National Landscape. This response will use the statutory designation of AONB, as legal and policy requirements flow from

that. The AONB is adjacent to the World Heritage Site of Blenheim Palace and Park. The WBW land is alongside the highway approach to the village from the East, which is one of two entrances to the AONB from the direction of Blenheim (the other being the Woodstock Road). It is also adjacent to the Oxfordshire Way/Akeman Street much walked and cycled footpath/bridleway which runs through the AONB. The WBW Land is near to both the vehicular and footpath routes and is cherished by both residents of Stonesfield and the wider public for its beauty, historic significance, recreational value, tranquillity and richness of wildlife. The significance of this is recognised in both the Parish Council's Local Landscape Assessment and in the decision of Stephen Normington, the Planning Inspector in the planning appeal by Cala Homes in 2019 (Appeal Decision dated 21 June 2019 APAP/D 3125/W/18/3209551), relating to the nearby Woodstock Road land.

The author of the Landscape Assessment, having noted the "strong rural character" of the landscape on this side of Stonesfield, i.e. "the Stonesfield Inner Fields," points out at page 49 para 6 that it "forms part of the rural landscape setting when approaching Stonesfield from two of the four roads that converge in the village," one of which is the Combe Road which borders the WBW Land. At page 48 para 3 of the Landscape Assessment the author, referring to what is now known as the William Buckland Way development, said the "Recent housing development at Charity Farm has created a hard edge to the village in these views, and additional development will further threaten the integrity of its valued rural character." The views with which the author was concerned were those of the village from the Oxfordshire Way/Akeman Street, which passes the village in the dip slope valley adjacent to this side of Stonesfield. The Landscape Assessment recognises that this is part of the "rural landscape setting for the settlement" which "contributes to the special qualities of the Cotswolds Area of Outstanding Natural Beauty" and is one of the "Remaining pockets of pastoral land on the southern edge of the village" which "add to the settlement's sense of time depth and survive as remnants of historic field enclosures." (Page 50 Landscape Assessment).

Stephen Normington, the Planning Inspector in the Cala Planning Appeal Decision relating to the nearby Woodstock Road land, expressed similar serious concern about the harmful effect of development in these fields upon the AONB setting of the village. Agreeing with the Landscape Assessment, he said at paragraph 52 of the Appeal Decision that from the Akeman Street footpath "current views looking towards the village on this approach are dominated by the incongruity of the Charity Farm development, which, owing to its urban form and materials, appears as a disjointed protrusion into the rural landscape and displays little integration with the rest of the village." He was concerned that to users of Akeman Street, in views looking north-west from the Oxfordshire Way, should the Cala proposal have been accepted, "The cumulative visual impact of the existing and proposed development when viewed from Oxfordshire Way would fundamentally and unacceptably change the characteristic open character of the dip slope lowland" and the village would appear as more of a modern 'suburbanisation' of a rural settlement within the AONB." All this would apply a fortiori to development of the WBW Land, which is closer and more visible than the Woodstock Road land, to users of the Oxfordshire Way and to those approaching Stonesfield along the Combe Road.

Paragraph 187 of the NPPF requires planning policies and decisions to contribute to and enhance the natural and local environment, inter alia, by protecting and enhancing valued landscapes, and paragraph 189 stipulates that "Great weight should be given to conserving and enhancing landscape and scenic beauty in National Landscapes" i.e. Areas of Outstanding Natural Beauty. Paragraph 190 of the NPPF requires the refusal, in the AONB, of planning permission for major development (defined in the NPPF glossary as "For housing, development where 10 or more homes will be provided, or the site has an area of 0.5 ha or more"), other than in exceptional circumstances and where it can be demonstrated that the development is in the public interest. Any development of the WBW Land, 2.6 ha in extent, likely to be proposed would be a "major development." Indeed, for development of the WBW Land to make a significant contribution to the West Oxfordshire District Council 5 Year Housing

Land Supply it would require to be a “major development.” To be acceptable in the AONB therefore it would need to satisfy both the “exceptional circumstances” and “public interest” tests. After a public inquiry of five days, including voluminous oral and written witness evidence and submissions by Queen’s Counsel, Mr Normington determined that a proposal to which applied very similar considerations to those which would apply to any major development on the WBW Land did not satisfy the two tests. A major development on the WBW Land would not satisfy them either.

Any suggestion that “unmet housing need” would constitute either exceptional circumstances or a public interest justifying major development, which Planning Inspector Normington rejected in the Cala appeal, is also shown to be ill-founded by the very thorough Housing Needs Assessment carried out during preparation of the draft Stonesfield Neighbourhood Plan. This Assessment concluded at pages 36 and 37 that the housing market in the existing built housing stock of the village would satisfy any relevant need for market housing: –

1. It is projected that the housing market will satisfy local need for anyone in the settlement seeking to move in the next five years, with significant excess capacity to cater for anyone who might wish to move but didn’t identify as knowing their future intentions at the date of the survey. There is no requirement for additional market housing and no requirement for a major development.
2. There may be a very small shortfall of social/affordable housing in the next five years.
3. There may be a case to deliver more social/affordable homes for people with a local (Stonesfield) connection which could be met via a small rural exception site.

There is no evidence base to support assertion A above of Blenheim WBW Representations. The most recent WODC Local Plan 2041 Consultation Summary Report is that of February 2024. In it the District Council at 3.108 recorded what it had said in the process of Consultation: “National policy and initial feedback on the local plan so far emphasise the need for the intrinsic character and beauty of the countryside to be recognised, protected and wherever possible enhanced. This is a particularly important issue for West Oxfordshire which has distinctive and varied countryside, contributing to the District’s character including the Cotswolds National Landscape.” The Report says at 3.114 “Comments expressed concerns regarding the (*sic*) development within designated landscapes such as the Cotswolds National Landscape, Green Belt and other protected areas. The consensus is that any development in these sensitive areas should be exceptional and meet specifically identified local needs.”

Planning Inspector Stephen Normington at paragraph 60 of his Appeal Decision in the Cala case took the view that “local housing need means need of a specific settlement.” That need, in the specific settlement of Stonesfield, as the Neighbourhood Plan Housing Needs Assessment established, will in the foreseeable future be “a very small shortfall of small affordable housing” which may be met by a small rural exception site comprising social/affordable homes for people with a local connection.

Therefore, any increase in housing provision by way of major development within West Oxfordshire District is overwhelmingly likely to be met in settlements outside the AONB and Stonesfield will not, as the Blenheim WBW Representations claim, “need to contribute to the delivery of the affordable and market housing required in West Oxfordshire.”

**Sustainable development of a limited number of affordable and market dwellings that can appropriately contribute to the settlement’s housing needs.”**

It follows from the above that, in the foreseeable future, except as may be provided by small rural exception site, there will be no need for contribution to the settlement’s housing needs by “a limited number of affordable and market dwellings.” There remains however the question of what constitutes

“sustainable development” in this context. There is no explanation in the Blenheim WBW Representations of what Blenheim means by “sustainable” in this context. Planning policy, e.g. the National Planning Policy Framework (the NPPF) and West Oxfordshire Local Plan (WOLP), require development where possible to be “sustainable” and indeed, *ceteris paribus*, includes a presumption in favour of sustainable development. The meaning of “sustainable” in a planning context has been a matter of considerable debate. It has achieved the status of motherhood and apple pie whilst rarely, if ever, being concisely defined. Central government’s Sustainable Development Management Plan 2020/25 (“the Management Plan”) produced by Public Health England in August 2020 explains its understanding of the priorities entailed by sustainability, including:

1. sustainable consumption and production;
2. climate change and energy;
3. natural resource protection and environmental enhancement;
4. sustainable communities.

The Management Plan acknowledges as one of the most used definitions of “sustainable development” that given at the Rio “Earth Summit” in 1992 by the Chairperson Gro Harlem Brundtland, i.e. “Development that meets the need of the present generation without compromising the needs of future generations to meet their own needs.” This objective is acknowledged in paragraph 7 of the NPPF. The NPPF, at paragraph 8, stipulates three overarching objectives for achieving sustainable development i.e. an economic objective, a social objective and an environmental objective. Any development proposals for the WBW Land would have to be judged against these considerations. The Cala planning inspector so assessed the Woodstock Road field and determined that the proposals then made were unacceptable. Taking into account the reasons he gave for his decision to reject the Cala Appeal, it is impossible to envisage a realistic proposal for major development on the WBW Land being in accordance with relevant planning policy.

Equally importantly Blenheim, in the WBW Representations, makes no attempt to explain how what it calls “the sustainable development of a limited number of affordable and market dwellings” would contribute to the four priorities of the central government Management Plan, slightly differently expressed as the three overarching objectives of the NPPF in relation to sustainability. Going back to sustainability basics, the Blenheim WBW Representations simply do not address the need to explain why such market development, in the context analysed by the Neighbourhood Plan Housing Needs Assessment, would be consistent with the Brundtland notion of sustainability expressed at the Rio “Earth Summit” in 1992 i.e. “Development that meets the need of the present generation without compromising the needs of future generations to meet their own needs.” The Housing Needs Assessment makes it clear that the housing needs of the present generation do not require more market housing in Stonesfield. The Landscape Assessment and the contents of the Cala planning appeal decision of Planning Inspector Stephen Normington make it clear that needs of future generations, including the right to enjoy “the special qualities of the Cotswolds Area of Outstanding Natural Beauty,” would be prejudiced by more such development and would be at odds with the requirement of paragraph 189 of the NPPF that “Great weight should be given to conserving and enhancing landscape and scenic beauty in National Landscapes”

## **Conclusion**

Taking all these matters into account and having considered the issue carefully, the Parish Council does not consider there are valid reasons for withdrawing its proposal within the draft Neighbourhood Plan for the designation of the land north of Woodstock Road as a Local Green Space.

[REDACTED]

Chair, Stonesfield Parish Council

By email to clerk@stonesfieldpc.uk

21 February 2025

Dear Chair,

Thank you for your letter of 12 February about the proposal that our field be designated a Local Green Space in the Neighbourhood Plan.

The field is owned jointly by the [REDACTED] (of which I am a trustee) and the [REDACTED]. I am not in a position to comment on behalf of all of us but I am copying this and your letter to the others in case they wish to comment as well.

The proposal is clearly intended to influence the WODC's response to the new housing targets being imposed by central government and, in particular, its consideration of our proposal to develop part of our field for affordable and other housing. Obviously therefore I oppose the suggestion that the whole field be designated a Local Green Space.

Paragraph 106 of the NPPF specifies that the designation of land as Local Green Space through local and neighbourhood plans "allows communities to identify and protect green areas of particular importance to them". However, there is no public access to this field. Moreover it is largely invisible to the community - from the Combe Road (except for the leafless winter months) behind a thick screen of bushes and trees and from the south behind the brow of the steep hill up from the line of the Oxfordshire Way. The arrows on the plan you enclosed are therefore misleading.

Paragraph 107 also says that a Local Green Space must be "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".

It is surely questionable that this field is "of particular importance" or "demonstrably special" to the community. I note incidentally that as of this evening there is no single picture of the field among all the favourite views of the village which members of the community have posted on your website.

The NPPF specifies that "designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services". We believe that the mix of housing types in our proposal will contribute to Stonesfield's healthy development and help meet real local, regional and national needs. That healthy development is what all of us want for a village which means a lot to our family: we have four generations buried in the churchyard, and my wife and I hope to be buried there in our turn.

We believe that the proposed development in our field can be one we will all be proud of. For that reason part of the field will remain undeveloped to preserve views south over the valley. In the spirit of compromise I suggest that the undeveloped part might then be considered for designation as a Local Green Space.

Yours sincerely,

[REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]

Chair, Stonesfield Parish Council  
By email to [clerk@stonesfieldpc.uk](mailto:clerk@stonesfieldpc.uk)

2<sup>nd</sup> May 2025

Dear Chair,

I am writing on behalf of the owners of the land described as '2. Paddock between Manor House and Combe Road' in Section 9 of the draft Stonesfield Neighbourhood Plan. The land is owned by the [REDACTED] and the [REDACTED]. I am writing to formally object to the designation of the land as Local Green Space (LGS).

The land does not meet the criteria in the National Planning Policy Framework which sets out at section 107:

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.

Section 107(b) is not met: there is no evidence that the land is demonstrably special to the local community *nor* that it holds particular local significance, although the regulations require both conditions to be met.

As you know, the land is privately owned with no lawful public access. The Site is defined by a strong tree-lined hedgerow to the north, west and east and mature hedgerow vegetation also runs along the south-eastern boundary, offering strong containment. Public visibility of the field is very limited from the village due to extensive hedgerows and vegetation along Combe Road, and any view on the approach to the village must be seen in the context of existing housing already lining the other side of Combe Road. The land is already protected by designation as falling within the Conservation Area and Area of Outstanding Natural Beauty.

The Parish Council purport to rely on factors said to be taken from the 'Parish Landscape Assessment' dated October 2024. As at today's date no particularised assessment of the proposed Local Green Spaces is available on the Parish website, which reads, "**Local Green Spaces – AWAITING UPDATE**".

In any event the factors identified do not provide sufficient evidence to overcome the criteria outlined above. They are generic and not specific to the field in question.

The Appendix also purports to lend support to the designation on the basis that:

- i) *It is also within the area which concerned Mr Normington in considering the*

*harmful effect of development upon the views from Akeman Street (paragraph 52 Appeal Decision dated 21 June 2019 APP/D 3125/W/18/3209551);*

That the field falls within an area referenced in an appeal in 2019 against a Planning Proposal for a different proposed development in a different location is clearly not evidence that our field holds particular significance to the local community. This is only evidence that **Mr Normington's proposal** would have had 'harmful effect upon views from Akeman Street'. We note that the 2023 Stonesfield Village individual survey conducted for the purposes of the Neighbourhood Plan suggests that only 7.04% of respondents use the Akeman Street path from the Stonesfield steps to the Combe dip more frequently than once a week, and 10.14% once a week. This is therefore not evidence that the field is demonstrably special to the local community *nor* that it holds particular local significance.

ii) *Is within the conservation area;*

This is not evidence that this field holds particular local significance, indeed this lends support to the contention that further protection is not warranted.

iii) *Was considered by the author of the Landscape Assessment who said of it "the enclosures immediately on the edge of the village - to the east and south-east of Stonesfield Manor/Church Street have retained much of the hedgerow vegetation and therefore their historic field patterns have been preserved. These much smaller fields have a more pastoral character that is distinctive and contrasts with the rest of the LLCA and they provide valued 'outward' public views from the settlement edge" (page 47, final paragraph and page 48, first paragraph, Landscape Assessment);*

As noted above, this report is not specific to the field in question. The location and possible impingement of the 'outward' public views in relation to our field have not been evidenced.

Photographs are included in the Appendix to the report, one of which has been taken from Manor Drive which is an access road which leads only to a small number of houses, and the other of views from Combe Road which are likely to be seen in passing by motorists (pedestrian views impinged by cars, road, signage etc). Neither provide evidence that the field is **demonstrably special** to a local community **and** holds a **particular local significance**. It is of note that neither view featured as a 'key view' in the 'Stonesfield Neighbourhood Plan: Character Assessment' Report.

We also note that the number of Respondents to the Stonesfield survey using footpaths from which the field *may* be visible on a more than weekly basis is low.

This therefore does not evidence that the field is **demonstrably special** to a local community **and** holds a **particular local significance**.

iv) *Is free from the mechanical intervention of arable farming and adjacent to 3 woodland copses and therefore richly fosters wildlife and a range of vegetation.*

There is no ecological evidence of the particular wildlife and vegetation said to be fostered within our field, let alone how it is said to be demonstrably special and to hold particular significance to the local community.

v) *Forms part of the "rural landscape setting" of the approach to Stonesfield and of this side of the village remarked upon in the Landscape Assessment .. which warns that this is "highly sensitive to development which would impact on its rural character; the village edge setting; open views across the landscape towards the settlement, or 'outward' views across the remaining pastoral fields south-east of Stonesfield Manor .. Development within the remaining smaller-scale pastoral fields to the south and south-east of the village will result in the loss of part of Stonesfield's historic landscape setting".*

Again, this is a generic descriptor and does is not evidence that this field is demonstrable special or holds particular local significance.

vi) *Falls within the statutorily designated Upper Thames Tributaries environmentally sensitive area ("the ESA" - see the Landscape Assessment).*

Once again, this is generic and is not evidence that this field is **demonstrably special** to a local community **and** holds a **particular local significance**.

vii) *Achieved 75.9% support for designation in the Village Survey.*

We note that in the 2023 Stonesfield Survey, the Parish Council proposed 15 sites for designation as Local Green Space. 578 people responded to Q28 regarding areas which should be afforded the designation. We note that in relation to **all** the proposed areas, a high proportion of the respondents advocated designation as Local Green Space, suggestive of blanket responding without proper application of the criteria. We do not accept that the response in relation to our field, when viewed in the context of the responses to the other proposed sites, is demonstrative of the field being of **particular** local significance to the local community. The sheer volume of sites which were proposed and which achieved high agreement levels amongst respondents, undermines the suggestion of particularity. Indeed, it is clear that when ranked against other proposed sites, the field achieved second **lowest** ranking of 'Strong agreement' of sites identified.

In any event, the survey does not provide evidence sufficient to overcome the criteria requirements as set out above. Respondents were not asked to confirm the basis for which they said the field held significance to them, and clearly, given the lack of public access to the field, it is difficult to perceive on what basis they could have said the criteria were met. The level of support for the designation is inconsistent with Respondents' reported frequency of use of local footpaths from which the site *may* be visible. We note that the extent of any visibility of the field in question from the footpaths is not set out in the report.

The Survey Responses therefore do not properly or sufficiently demonstrate that the field is special to the local community **and** holds a **particular** local significance.

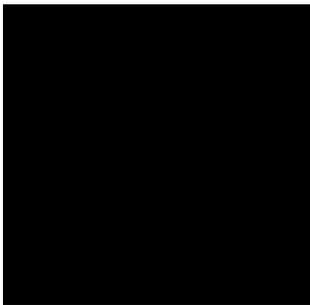
The Parish Council are therefore unable to properly **evidence** that the field is demonstrably special to the local community **and** holds a particular local significance. There is no evidence, for example, that **this field** holds particular beauty, historic significance, recreational value, tranquillity or richness of its wildlife.

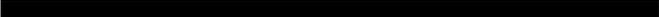
Designation of the field as a Local Green Space would therefore be **unreasonable** and **unjustified** as the requisite criteria are not met.

It moreover would run counter to the overarching objective of achieving sustainable development. We note in particular that, “designating any Local Green Space needs to be consistent with local planning for sustainable development in the area. In particular, plans must identify sufficient land in suitable locations to meet identified development needs and the Local Green Space designation should not be used in a way that undermines this aim of plan making”.

The attempt to designate the field as a Local Green Space in the absence of evidence risks undermining this overarching aim.

Yours faithfully,





Saturday 28<sup>th</sup> December 2024

Stonesfield Parish Council  
Stonesfield Village Hall  
Field Close  
Stonesfield  
OX29 8HA

**Stonesfield Neighbourhood Development Plan – Land at Brook Lane, Stonesfield**

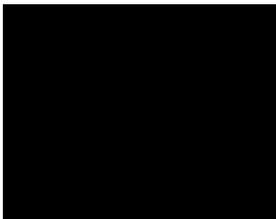
Dear Sir or Madam,

I am writing in response to your letter dated 6th December 2024, which I received via recorded post on 14th December 2024, regarding the proposed designation of my land at Brook Lane, Stonesfield.

I have briefly reviewed the contents of your letter. However, due to the particularly busy nature of this time of year, I have not yet been able to provide a full response. I will ensure that either I or my appointed agent responds within the specified timeframe.

To ensure that my communication is formally on record, I have emailed [clerk@stonesfieldpc.uk](mailto:clerk@stonesfieldpc.uk) a copy of this letter for documentation purposes.

Yours sincerely,



Stonesfield Parish Council  
Stonefield Village Hall  
Field Close  
Stonesfield  
OX29 8HA

30<sup>th</sup> January 2025

Dear Sir / Madam,

**STONESFIELD NEIGHBOURHOOD PLAN; POSSIBLE DESIGNATIONS AS LOCAL GREEN SPACE**

I am instructed by and write on behalf of [REDACTED] in formal objection to possible designation of their land at Brook Lane as Local Green Space (LGS) within the emerging Neighbourhood Plan.

In objection we note your letter to my client dated 6<sup>th</sup> December 2024. I understand my client has previously contacted you to confirm that we would be making formal representations.

Paragraphs 106 and 107 of the National Planning Policy Framework (December 2024) advises that “The designation of land as Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them. Designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or updated, and be capable of enduring beyond the end of the plan period.”

It also goes on to add that “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 proposed designation of land at Brook Lane does not meet these requirements. Designations of LGS must be considered holistically as part of a sustainable approach to planning for development and must be seen alongside and be consistent with and compliment other objectives for investments, provision of new homes, jobs and other essential services. To promote and consider such designations in isolation fundamentally misses the basic approach to sustainable local planning. We have seen nothing in the emerging Local Plan which seeks to address these wider issues in totality, in a complimentary or consistent way. Of particular note is the national housing crisis alongside national efforts through planning to stimulate economic growth. Villages like Stonesfield are not immune from the issues or should feel that they cannot play their role in addressing these national and local issues. The Neighbourhood Plan should not merely be a tool for protectionist designations such as LGS in attempt to layer up policy designations of constraint, but should be a plan to make positive contributions to local needs for growth consistent with national planning objectives. The starting point for your designation of LGS is therefore fundamentally wrong.

That said, the site itself does not align to paragraph 107 tests on the basis that;

- The extent to which it has been demonstrated to be “special” is tenuous to the extreme.
- It has no particular local significance in any difference to any other parcel of land around the village
- It is not in itself of any particular beauty, more is quite distinct in its character with more of a domesticated, plain appearance of heavily managed grassed areas, formally planted trees and urbanising features
- It has no historic significance whatsoever
- It has no recreational value whatsoever, being entirely private with no public access
- Its not a playing field
- There is no particular tranquillity associated with the site, more the family regularly use and maintain the site affecting its tranquillity
- There is no nature or wildlife value on the site itself with the only feature of any value being the boundary hedge to the Public Right of Way. This is quite distinct from wider areas outside of the site which are not so intensively managed and have specific and designated value for wildlife, yet have not been so designated with a suggested LGS.
- Its not typical of local character in terms of its appearance, but its character is different and reflective of its more intensive use by the Family – in fact its quite distinct in being different and not of local character of the typically farmland around the village which this is not.

Your letter of the 6<sup>th</sup> December provided some simple and basic assessment however the content and assessment of the site is also flawed and unsound on the basis that;

1. You failed to have contacted the owner in advance of the suggested designation so therefore couldn't record whether the owner supports the designation. The owner does NOT support the suggested LGS designation and will not be supporting any efforts for the site to align to any of the suggested (and wrong) contributions the site is perceived to provide.
2. The planning history of the recent planning application is noted. ItTo be correct and more balanced, that application was not universally objected to by the village, in our experience the level of objection was modest and from parties with more of an eye on the emerging Neighbourhood Plan, and an endeavour to resist development proposals in principle. There was in fact also support from respondents to the proposals. The vast majority of the village didn't even comment on the application. The planning history provides no endorsement whatsoever for its perceived local value, in fact suggests to the contrary.
3. The field is enclosed by boundary hedging but unlike other enclosures around the village the site is not typical in a similar character
4. There are fundamental barriers to the local community accessing the site. There are no public footpaths and the site is entirely private. The extent to which there is a very brief and narrow view into the site from the gated access from Brook Lane, fails to actually recognise that for almost all of its Brook Lane frontage the site cannot be seen at all by the community as it is behind a very high and dense hedgerow belt. The statement in your assessment is misleading at best but more factually is actually wrong.
5. The photograph taken is not representative of the view along Brook Lane but is taken from that very narrow snapshot – it cannot in fact be seen from the valley in the distance as that valley and the PROW is at a much lower level.
6. There is no evidence to show any contribution of this site to any view from Akeman Street

7. Views of the site from the wider area in the wider distance would only see the site in the context of the large residential bungalow immediately to the north
8. The site itself is not even discernible from North Leigh Roman Villa nevermind being “crucial” to the village setting from such as wrongly described.
9. The Upper Thames Tributaries Environmentally Sensitive Area is an extensive tract of land – there is nothing unique in this sites inclusion in that ESA that makes it in any way different to other areas and which would suggest any qualification for LGS designation – that statement is misleading by suggesting this has any relevance or justification to this site being LGS
10. It is not within the stated Conservation Target Area - that should be to its justification for NOT being LGS not a reason to include it – other areas of land near to the village are within that CTA.
11. The figure of 86.1% support is a misleading statistic. The question of LGS status was a closed question. How many other sites were included – were any not supported by respondents or rejected as LGS. A question that merely asks if you support protecting a site as LGS is not a fair or balanced question, nor does allow those voting to fully understand or make comparative choices. Regard has to be had to the number of respondents relative to the whole village. It doesn’t concur with the recent planning history which was more balanced with some in favour of some development on the site.
12. The text in the plan extract and the plan analysis is not correct. It doesn’t account for local topography or existing landscape features which screen views. It fails to highlight how the site is actually restricted in view from the PROW to the west due to boundary landscaping. The glimpse of the site through the gate is very limited and temporary and solely at the offer of the landowner. The view from the PROW to the south east are equally limited because of the local topography – it is not possible to see the site from almost all of this public footpath because of the levels – the PROW is sat down significantly lower – views more directly from the east have a mere glimpse of the site but are seen with the adjacent bungalow in the view.
13. The dashed line is not a PROW or even a permissive path
14. It is misleading and factually incorrect to state there is any discernible view of the site from North Leigh Roman Villa.

The above should be fully taken into account. The site should not be included as Local Green Space. It is not characteristic of such and there is no evidence to suggest it is. Neither does not need to be designated as such.

We will be formally objecting to the Plan at any further point and be pursuing these objections with the fullest of rigour through all stages of the Neighbourhood Plan preparation and progress opportunities for legal challenge if the plan is pursued with such flawed evidence.

Yours faithfully



**Jason M Tait - MRTPI, Director**  
**For and on behalf of Planning Prospects Ltd**

The Diocesan Board of Finance has responded in one email from [REDACTED] of Bluestone Planning covering the four sites as follows:

I have managed to catch up with my client [REDACTED] at the Oxford Diocesan Board of Finance recently and I have conveyed the substance of our discussions on the 7<sup>th</sup> to him. Like me, he is concerned about the need to introduce a LGS designation to plots 5a, 5b and 7 to the south of the urban edge of the village (most of which is controlled by the Diocese and all of which forms a continuous single land parcel) and on the allotment site (6) too (which is linked to the others and is therefore also at risk of being seen as forming part of a continuous tract of land).

Adopting the measurements in your document the total area is approx. 2.96 hectares of land. I measure it to be slightly larger at approx. 3.1 hectares, but either way the total area of land is quite extensive and I am concerned that it could be deemed to be an extensive tract of land collectively (by stringing together a series of separate sites to create a larger whole).

I am especially mindful of the [Planning Practice Guidance on this matter](#), produced by the Government which states:

***“How big can a Local Green Space be? There are no hard and fast rules about how big a Local Green Space can be because places are different and a degree of judgment will inevitably be needed. However, paragraph 100 of the National Planning Policy Framework is clear that Local Green Space designation should only be used where the green area concerned is not an extensive tract of land. Consequently blanket designation of open countryside adjacent to settlements will not be appropriate. In particular, designation should not be proposed as a ‘back door’ way to try to achieve what would amount to a new area of Green Belt by another name.***

*Paragraph: 015 Reference ID: 37-015-20140306 Revision date: 06 03 2014”*

Taken together I do believe that the four parcels of land could be construed to be the blanket designation of open countryside adjacent to the settlement, and whilst I understand the reasons for wishing to place the LGS designation on the land I do think it may be already unnecessary and superfluous for the following reasons:

1. The allotments site 6 is already protected, as it is situated within the village Conservation Area and Cotswolds National Landscape, and the southern part is situated within the Northern Evenlode Conservation Target Area
2. Sites 5a, 5b and 7 (now sites 4, 6 and 7) are situated immediately adjacent to the Stonesfield Common, Bottoms & Banks SSSI, and within the nearest SSSI Impact Zone; they also contain Deciduous Woodland Priority Habitat and are also within the Cotswolds National Landscape, Upper Thames Tributaries ESA and the Northern Evenlode Conservation Target Area

In addition there are a number of rights of way crossing or passing through the land (especially sites 5a and 5b, now sites 4 and 5):



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In addition there are a number of rights of way crossing or passing through the land (especially sites 5a and 5b, now sites 4 and 5):

[REDACTED]

# Stonesfield Parish Council

Stonesfield Village Hall, Field Close, Stonesfield, OX29 8HA

Email: clerk@stonesfieldpc.uk



1 October 2025



**Stonesfield Neighbourhood Plan – possible designation as Local Green Space of land at Stonesfield: (1) the Glebe Land between Brook Lane and the Scout Hut (2) the Scout Hut land (3) Churchfields allotments (4) land to the right after the last house on the access lane to the Scout Hut.**

Thank you for your written representations in response to my letter of 6 December 2024. I am sorry for the delay in replying to those. That has been occasioned largely because of the very considerable work it has been necessary to do in giving careful consideration to the several representations made by owners of all the parcels of land proposed for designation, deciding what action should be taken in the light of those representations and drafting responses. That work is time-consuming and we are reliant upon the goodwill and unpaid work of volunteers to assist us in preparation for deliberations by parish councillors.

I attach/enclose a note of the Parish Council's consideration of your submissions, of its determinations and the reasons for that determination.

Yours sincerely,



*Chair of Stonesfield Parish Council.*

## Parish Council response

█ suggests that proposed LGSs 4, 5, 6 and 7 (formerly 5a, 5b, 6 and 7) are all one parcel of land and as such are an extensive parcel of land, although the NPPF doesn't define 'extensive'. This is not the case for Stonesfield residents i.e they undoubtedly view them as four distinct parcels of land, no one of which can be described as "extensive." As originally acknowledged in Appendix C to the draft Neighbourhood Plan, to a walker going from Brook Lane to the Scout hut proposed LGSs 4 & 5 (at the time of █ representations referred to as 5a and 5b) may well appear as one area of limestone grassland, scrub, and woodland above the remains of the slate industry's chipping bank. Proposed LGS 4 is however Diocesan glebe land, whereas proposed LGS 5 is now owned by Stonesfield Scouts who support the proposed LGS designation. Stonesfield residents refer to these two separate parcels of land as the Glebe Land and the Scout Hut land and consider them to have different uses and to be of significance to the community in different ways, albeit in each case of special significance.

Proposed LGS 6, the Churchfields allotments, has a very short physical connection with the Glebe Land of less than 20m which cannot be seen by a walker on either of the Glebe Land footpaths or by anyone passing along Churchfields. The well-used allotments have a completely distinct and different use and appearance and, though openly viewed and thus cherished by the community as well as their many users, can only be viewed from the road, Churchfields, and the adjoining houses. Stonesfield residents view the allotments as a distinct parcel of land which is demonstrably special and has a particular local significance as allotments. This special quality and this particular local significance are different in nature from the special quality and particular local significance of the Glebe Land and the special quality and particular significance of the Scout Hut land.

The paddocks to the right of Timber Yard Lane (perhaps more accurately to the right of the right of the Scout Hut access lane) are grazed by horses and occasionally sheep and will shortly include a community orchard. Stonesfield Parochial Church Council supports this proposed LGS designation.

█ addresses principally the "not extensive" condition for designation as LGS and not the other two conditions required to be fulfilled by para 107 of the NPPF (12 December 2024 edition as amended). The submissions relevant to the three conditions made in Appendix C will not be repeated here. His suggestion that designation "may be already unnecessary and superfluous" by virtue of other designations e.g. Conservation Area, Cotswold National Landscape, Conservation Target Area, SSSI is without foundation. There is nothing in the NPPF to suggest that where LGS designation is appropriate by virtue of fulfilment of the para 107 conditions it should not be proceeded with because the land is the subject of other designations. The purposes of the various designations are different.

## Conclusion

The Parish Council is of the considered view for the detailed reasons set out above and in Appendix C, that proposed LGSs 4, 5, 6 and 7, i.e. the Glebe Land between Brook Lane and the Scout Hut (proposed LGS 4), the Scout Hut land (proposed LGS 5), the Churchfields allotments (proposed LGS 6) and the paddocks at Stockey Bottom (proposed LGS 7) are distinctly different from each other in the perception by the local community of their demonstrably special qualities and of their particular local significance. The Council considers they are all worthy of separate designation as Local Green Spaces because they all, in different ways, fulfil the NPPF criteria, most pertinently each having its own particular local significance and demonstrably special quality to the local community.

From: [REDACTED]  
Date: Sun, 2 Mar 2025, 11:27  
Subject: Scouts, Glebe Land and LGS  
To: Clerk <[REDACTED]>

Dear SPC,

I have read through the letter you sent me and the detail in the slate and, in principle, I cannot think of a reason why the Scout Land should not be designated a LGS. It certainly meets the criteria I found below from the website

*(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.*

I will come and try and meet you in one of the meetings, and it would be good just to clarify that if this land became LGS it would not place any restrictions on the access or activities the Scouts can do down there. This includes camp fires, managing the land and trees, maintaining the property and providing suitable space for the Scouting activities to occur.

Yours

[REDACTED]

# Stonesfield Parish Council

Stonesfield Village Hall, Field Close, Stonesfield, OX29 8HA

Email: clerk@stonesfieldpc.uk



1 October 2025

Dear ,

**Stonesfield Neighbourhood Plan – possible designation of land owned by 1<sup>st</sup> Stonesfield Scouts as a Local Green Space: the Scout hut land.**

Thank you for your written representations of 2 March 2025 on behalf of the 1<sup>st</sup> Stonesfield Scouts in response to my letter of 12 February 2025. I am sorry for the delay in replying to those. That has been occasioned largely because of the very considerable work it has been necessary to do in giving careful consideration to the several representations made by owners of all the parcels of land proposed for designation, deciding what action should be taken in the light of those representations and drafting responses. That work is time-consuming and we are reliant upon the goodwill and unpaid work of volunteers to assist us in preparation for deliberations by parish councillors.

We are pleased that you support the designation of the Scout hut land. The Parish Council will include the Scout hut land in the draft Neighbourhood Plan.

Yours sincerely,



*Chair of Stonesfield Parish Council.*

The Diocesan Board of Finance has responded in one email from [REDACTED] of Bluestone Planning covering the four sites as follows:

I have managed to catch up with my client [REDACTED] at the Oxford Diocesan Board of Finance recently and I have conveyed the substance of our discussions on the 7<sup>th</sup> to him. Like me, he is concerned about the need to introduce a LGS designation to plots 5a, 5b and 7 to the south of the urban edge of the village (most of which is controlled by the Diocese and all of which forms a continuous single land parcel) and on the allotment site (6) too (which is linked to the others and is therefore also at risk of being seen as forming part of a continuous tract of land).

Adopting the measurements in your document the total area is approx. 2.96 hectares of land. I measure it to be slightly larger at approx. 3.1 hectares, but either way the total area of land is quite extensive and I am concerned that it could be deemed to be an extensive tract of land collectively (by stringing together a series of separate sites to create a larger whole).

I am especially mindful of the [Planning Practice Guidance on this matter](#), produced by the Government which states:

***“How big can a Local Green Space be? There are no hard and fast rules about how big a Local Green Space can be because places are different and a degree of judgment will inevitably be needed. However, paragraph 100 of the National Planning Policy Framework is clear that Local Green Space designation should only be used where the green area concerned is not an extensive tract of land. Consequently blanket designation of open countryside adjacent to settlements will not be appropriate. In particular, designation should not be proposed as a ‘back door’ way to try to achieve what would amount to a new area of Green Belt by another name.***

*Paragraph: 015 Reference ID: 37-015-20140306 Revision date: 06 03 2014”*

Taken together I do believe that the four parcels of land could be construed to be the blanket designation of open countryside adjacent to the settlement, and whilst I understand the reasons for wishing to place the LGS designation on the land I do think it may be already unnecessary and superfluous for the following reasons:

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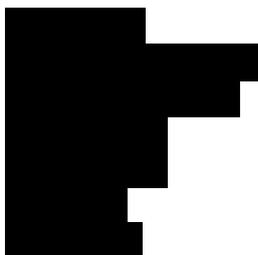
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[REDACTED]

# Stonesfield Parish Council

Stonesfield Village Hall, Field Close, Stonesfield, OX29 8HA

Email: clerk@stonesfieldpc.uk



1 October 2025

Dear ,

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Yours sincerely,



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## Parish Council response

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28th January 2025



Chair – Stonesfield Parish Council  
Stonesfield Village Hall  
Field Close  
Stonesfield  
OX29 8HA

**Stonesfield Neighbourhood Development Plan –  
possible designation of land as a Local Green Space**

Dear ,

Thank you for your letter of 6th December 2024 about the possible designation of land at Stockey Bottom, owned by the church, as a Local Green Space. In Section 7 of the Plan this area is called 'Paddocks to the right after the last house of Timber Yard Lane'.

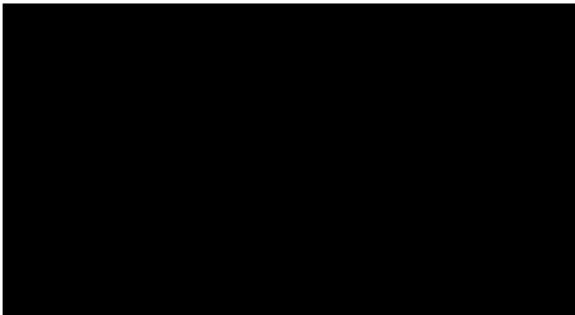
The Rector, Churchwarden and Parochial Church Council have considered this proposal carefully, and confirm their support for the proposal to designate the land, which is marked in green on the plan, as a Local Green Space. In our view it meets the NPPF criteria.

We are very supportive of any measure to protect this special and beautiful area of pasture from development.

Point to note:

**Public access:** It is important to emphasise that there are no public rights of way across the land, and so the benefits to the public are essentially the **views** across it as indicated by the arrows on the plan. It is good that this is recorded in Part 4 of Section 7, but there should not be confusion with the 'small network of public footpaths' mentioned in Part 5 of Section 7. If the designation is successful, it does not follow that there is public access.

Yours sincerely



The Diocesan Board of Finance has responded in one email from [REDACTED] of Bluestone Planning covering the four sites as follows:

I have managed to catch up with my client [REDACTED] at the Oxford Diocesan Board of Finance recently and I have conveyed the substance of our discussions on the 7<sup>th</sup> to him. Like me, he is concerned about the need to introduce a LGS designation to plots 5a, 5b and 7 to the south of the urban edge of the village (most of which is controlled by the Diocese and all of which forms a continuous single land parcel) and on the allotment site (6) too (which is linked to the others and is therefore also at risk of being seen as forming part of a continuous tract of land).

Adopting the measurements in your document the total area is approx. 2.96 hectares of land. I measure it to be slightly larger at approx. 3.1 hectares, but either way the total area of land is quite extensive and I am concerned that it could be deemed to be an extensive tract of land collectively (by stringing together a series of separate sites to create a larger whole).

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*Paragraph: 015 Reference ID: 37-015-20140306 Revision date: 06 03 2014”*

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In addition there are a number of rights of way crossing or passing through the land (especially sites 5a and 5b, now sites 4 and 5):

[REDACTED]

# Stonesfield Parish Council

Stonesfield Village Hall, Field Close, Stonesfield, OX29 8HA

Email: clerk@stonesfieldpc.uk

[REDACTED]

[REDACTED]

1 October 2025

Dear [REDACTED],

**Stonesfield Neighbourhood Plan – possible designation of land owned by Stonesfield Parochial Church Council as a Local Green Space: the at Stockey Bottom, Churchfields.**

Thank you for your written representations of 28 January 2025 on behalf of Stonesfield Parochial Church Council in response to my letter of 6 December 2024. I am sorry for the delay in replying to those. That has been occasioned largely because of the very considerable work it has been necessary to do in giving careful consideration to the several representations made by owners of all the parcels of land proposed for designation, deciding what action should be taken in the light of those representations and drafting responses. That work is time-consuming and we are reliant upon the goodwill and unpaid work of volunteers to assist us in preparation for deliberations by parish councillors.

We are pleased that you support the designation of the paddocks at Stockey Bottom, Churchfields. The Parish Council will include the paddocks in the draft Neighbourhood Plan.

Yours sincerely,

[REDACTED]

*Chair of Stonesfield Parish Council.*

# Stonesfield Parish Council

Stonesfield Village Hall, Field Close, Stonesfield, OX29 8HA

Email: clerk@stonesfieldpc.uk

[Redacted]

[Redacted]

1 October 2025

Dear [Redacted],

[Redacted]

Thank you for your written representations in response to my letter of 6 December 2024. I am sorry for the delay in replying to those. That has been occasioned largely because of the very considerable work it has been necessary to do in giving careful consideration to the several representations made by owners of all the parcels of land proposed for designation, deciding what action should be taken in the light of those representations and drafting responses. That work is time-consuming and we are reliant upon the goodwill and unpaid work of volunteers to assist us in preparation for deliberations by parish councillors.

I attach/enclose a note of the Parish Council's consideration of your submissions, of its determinations and the reasons for that determination.

Yours sincerely,

[Redacted]

*Chair of Stonesfield Parish Council.*

## Parish Council response

█ suggests that proposed LGSs 4, 5, 6 and 7 (formerly 5a, 5b, 6 and 7) are all one parcel of land and as such are an extensive parcel of land, although the NPPF doesn't define 'extensive'. This is not the case for Stonesfield residents i.e they undoubtedly view them as four distinct parcels of land, no one of which can be described as "extensive." As originally acknowledged in Appendix C to the draft Neighbourhood Plan, to a walker going from Brook Lane to the Scout hut proposed LGSs 4 & 5 (at the time of █ representations referred to as 5a and 5b) may well appear as one area of limestone grassland, scrub, and woodland above the remains of the slate industry's chipping bank. Proposed LGS 4 is however Diocesan glebe land, whereas proposed LGS 5 is now owned by Stonesfield Scouts who support the proposed LGS designation. Stonesfield residents refer to these two separate parcels of land as the Glebe Land and the Scout Hut land and consider them to have different uses and to be of significance to the community in different ways, albeit in each case of special significance.

Proposed LGS 6, the Churchfields allotments, has a very short physical connection with the Glebe Land of less than 20m which cannot be seen by a walker on either of the Glebe Land footpaths or by anyone passing along Churchfields. The well-used allotments have a completely distinct and different use and appearance and, though openly viewed and thus cherished by the community as well as their many users, can only be viewed from the road, Churchfields, and the adjoining houses. Stonesfield residents view the allotments as a distinct parcel of land which is demonstrably special and has a particular local significance as allotments. This special quality and this particular local significance are different in nature from the special quality and particular local significance of the Glebe Land and the special quality and particular significance of the Scout Hut land.

The paddocks to the right of Timber Yard Lane (perhaps more accurately to the right of the right of the Scout Hut access lane) are grazed by horses and occasionally sheep and will shortly include a community orchard. Stonesfield Parochial Church Council supports this proposed LGS designation.

█ addresses principally the "not extensive" condition for designation as LGS and not the other two conditions required to be fulfilled by para 107 of the NPPF (12 December 2024 edition as amended). The submissions relevant to the three conditions made in Appendix C will not be repeated here. His suggestion that designation "may be already unnecessary and superfluous" by virtue of other designations e.g. Conservation Area, Cotswold National Landscape, Conservation Target Area, SSSI is without foundation. There is nothing in the NPPF to suggest that where LGS designation is appropriate by virtue of fulfilment of the para 107 conditions it should not be proceeded with because the land is the subject of other designations. The purposes of the various designations are different.

## Conclusion

The Parish Council is of the considered view for the detailed reasons set out above and in Appendix C, that proposed LGSs 4, 5, 6 and 7, i.e. the Glebe Land between Brook Lane and the Scout Hut (proposed LGS 4), the Scout Hut land (proposed LGS 5), the Churchfields allotments (proposed LGS 6) and the paddocks at Stockey Bottom (proposed LGS 7) are distinctly different from each other in the perception by the local community of their demonstrably special qualities and of their particular local significance. The Council considers they are all worthy of separate designation as Local Green Spaces because they all, in different ways, fulfil the NPPF criteria, most pertinently each having its own particular local significance and demonstrably special quality to the local community.

2<sup>nd</sup> April 2025

[REDACTED]  
Stonesfield Parish Council

Stonesfield Village Hall

Field Close

Stonesfield

OX29 8HA

**Sent via E-mail & By hand**

Ref: Stonesfield Neighbourhood Development Plan

Dear [REDACTED]

Thank you for your letters dated Wednesday 26th March delivered we assume by hand and left in our post boxes, notifying ourselves of the Parish Council's intentions with regards to the proposed areas of Local Green Space in the Stonesfield Neighbourhood Plan.

[REDACTED] families for many generations have been owners and "guardians" of land within the village and its surroundings. We have always had the protection and long-term interests of the community and its natural assets as a priority.

However, we are some-what dismayed by the lack of consultation on the proposed Stonesfield Neighbourhood plan, considering land that we both own has been identified in the plan. (Specifically plots 8A and 8B)

Our experience has been poor and is detailed below:

[REDACTED] was only contacted on Sunday 23<sup>rd</sup> March at 6pm by an unexpected phone call from [REDACTED] asking about land ownership in which she was asked, did she own the paddocks on Witney Lane and also to confirm who owned the land further down Witney Lane identified on the plan as plot 8B. She was unsure why she was being contacted and only when asking why they needed to know, was then informed about the Plan.

[REDACTED] even worse, as he happened to be in the Stonesfield Sports and Social club where a conversation was overheard discussing who owned plot 8A, identified on the plan.

Up until these dates no contact had been made with either family to discuss the intentions of the plan.

①

Secondly, on the call to [REDACTED] on Sunday 23rd March at 6pm, [REDACTED] asked whether this could be challenged only to be told it was too late as the survey had already gone out and results were back.

Subsequently, we have reviewed the original proposed plan documentation and both pieces of land were wrongly identified as likely being owned by Vanborough Trust (Blenheim). Both families have long established rental agreements on land with the trust over many decades, both for grazing and as part of [REDACTED] farm and were surprised that the opposite side of Witney Lane locally known as the "triangle" and currently under a grazing contract between [REDACTED] and [REDACTED] had not been identified as a Local Green space if we are being consistent.

There are many other areas of the village which also seem to have not been considered or perhaps they were but not put in the plan after speaking with landowners. This is unclear to us. We would like to understand which areas were considered but did not make it into the final plan.

We are very aware of the emotion attached to development over the recent years concerning Blenheim, both within our Stonesfield community and beyond in the immediate surrounding areas, which can often influence people's opinion when potentially related to future development plans for housing.

What both families are keen to understand, is how land was identified in the first instance to be put into the survey for people to share their views. As previously mentioned as landowners, we were not even consulted about the prospect of this. We would request a response detailing exactly who was involved and how these pieces of land were identified and by what authority they could represent the village in doing so.

Secondly on the identification of land, what efforts had been made to contact both families to share that their land had been potentially identified?

As previously mentioned, the land owned by both [REDACTED] were wrongly identified as belonging to the Vanborough Trust. We are aware that a letter was sent to Blenheim concerning the plan sharing with them potential land identified on 6th December 2024 to which they responded on the 31st January. In this response, the Trust clearly stated they did not own the land which belongs to [REDACTED]

To this point, why was it not until 26th March that [REDACTED] were officially contacted?

In your letter dated 26th March, you kindly enclosed Appendix C of the now rightly identifying ownership of plots 8A and 8B. It appears that this is clearly an amendment and has bullet points highlighted as attached.

It should be noted that up until this letter, we were not aware of the potential designation and we had not been informed of the parish councils' desire to designate the field as an LGS. This should be included.

(2)

We do believe therefore that the survey sent out and subsequent survey feedback is now invalid as given:

1. That the land was wrongly identified as owned by [REDACTED]
2. [REDACTED] had not been made aware of their land's inclusion in the plan and potential designation of the land as Local Green Space is not valid as incorrect information has been provided to potential survey respondents.
3. Plot 8a is an arable field and is currently in a Mid-Tier Country Side Stewardship Scheme, and naming the field a "Paddock" gives the wrong impression for the survey.
4. As an extra point, [REDACTED] the field known as plot 1 on a long-term tenancy on the Neighbourhood Development Plan and this is also an arable field and currently in a Mid-Tier Country Side Stewardship Scheme. As he rents this, from Blenheim, if not already, they will be in touch concerning this.

The survey now should be re-issued with the correct information.

On broader concerns whilst we are always keen to limit encroachment into our green spaces and recognise the value of a neighbourhood plan but the overall plan also has to consider potential development areas, not simply areas to protect. The overall document does not consider the following:

Paragraph 106 of the NPPF requires

Local Green Space designations to be consistent with the local planning of sustainable development and complement the delivery of sufficient homes, jobs and other essential services. Whilst there is no requirement for neighbourhood plans to allocate land for development, it is a basic condition that neighbourhood plans must contribute to the achievement of sustainable development.

West Oxfordshire District Council is in the process of developing a new Local Plan. The Council does not have a 5 Year Housing Land Supply and further to changes in national policy regarding housing requirements, it must provide for significantly more housing land than previously anticipated. Settlements across the District, including those within the Cotswolds National Landscape, will need to contribute to the delivery of the affordable and market housing required in West Oxfordshire.

Various constraints to development mean that there are only limited opportunities to provide for sustainable growth in and around Stonesfield.

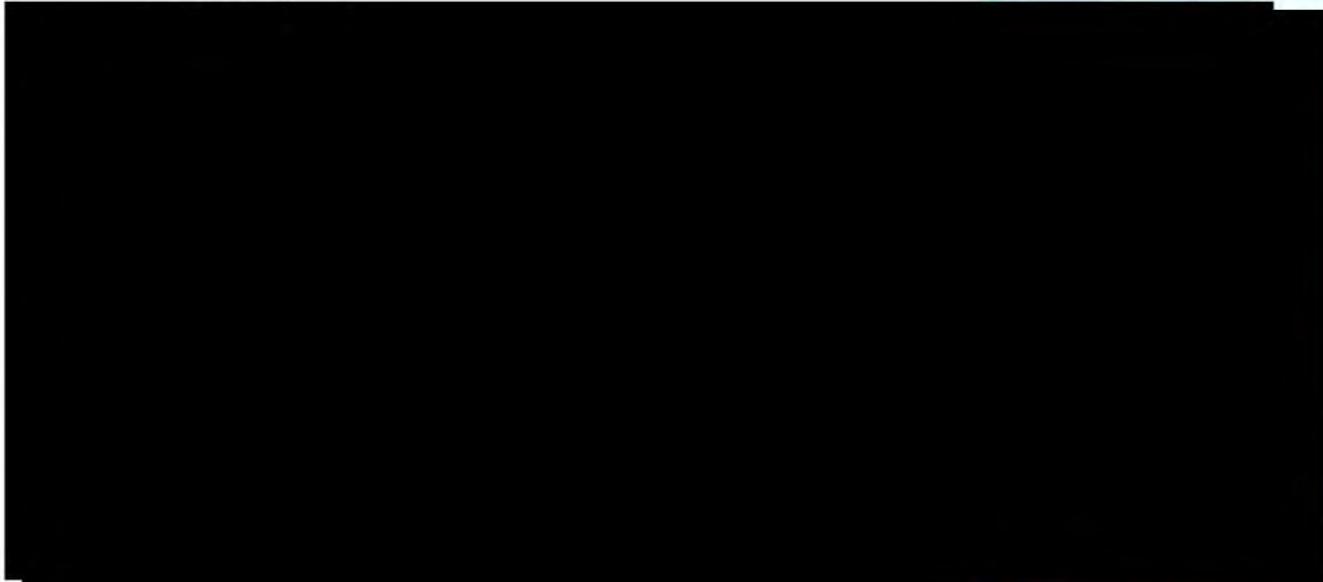
Whilst there is no current intention to develop the paddocks or the arable parcel along Witney Lane, this land and potentially the triangle could be seen as potential development opportunities to support this part of the broader neighbourhood plan.

On this point we want to make it clear that we are not seeking to develop on the identified land in the plan.

We are jointly writing and signing this response as after some discussion as we appear to have been through a similar experience and have agreed views on the process followed to date.

We are disappointed and feel we have been overlooked in this process especially as the families have been an active and supportive part of the community for many generations and are surely owed some common curtesy and engagement when plans like this are being developed.

Kind Regards



④

# Stonesfield Parish Council

Stonesfield Village Hall, Field Close, Stonesfield, OX29 8HA

Email: clerk@stonesfieldpc.uk



1 October 2025

Dear ,

**Stonesfield Neighbourhood Plan – possible designation of land owned by you as a Local Green Space.**

Thank you for your written representations in response to my letter of 26 March 2025. I am sorry for the delay in replying to those. That has been occasioned largely because of the very considerable work it has been necessary to do in giving careful consideration to the several representations made by owners of all the parcels of land proposed for designation, deciding what action should be taken in the light of those representations and drafting responses. That work is time-consuming and we are reliant upon the goodwill and unpaid work of volunteers to assist us in preparation for deliberations by parish councillors.

I attach/enclose a note of the Parish Council's consideration of your submissions, of its determination and the reasons for that determination.

Yours sincerely,

,

*Chair of Stonesfield Parish Council.*

## Parish Council response

Proposed Stonesfield Neighbourhood Plan.  
Proposed Local Green Spaces Designation.  
Land south-east of Witney Lane, Stonesfield.

Representations by letter to the Chair of Stonesfield Parish Council dated 2 April 2025 by [REDACTED]

The Stonesfield Parish Council (“SPC”) has carefully considered the [REDACTED] Representations and its consideration and conclusions are summarised as follows: –

### Identification of ownership.

[REDACTED] are understandably dissatisfied that the proposed designation of the land came to their attention late in the process. The Parish Council regrets this but hopes that [REDACTED] and [REDACTED] may understand that all efforts were made to ascertain the ownership of the land and to consult the “owners.” [REDACTED] say that “both pieces of land were wrongly identified as likely being owned by Vanbrugh Trust (Blenheim)” and “We are aware that a letter was sent to Blenheim concerning the plan sharing with them potential land identified on 6 December 2024 to which they responded on the 31<sup>st</sup> January. In this response the Trust clearly stated they did not own the land which belongs to [REDACTED]. To this point, why was it not until 26<sup>th</sup> of March that [REDACTED] officially contacted?”

1. The starting point for identifying ownership of land which is in question is HM Land Registry. A search of the area of land in question at the Registry, identified by its location on the relevant map, appeared to result in a statement of ownership as follows: “Land part of Blenheim Estate lying to the west of Stonesfield.” It was by this means that the Neighbourhood Plan Steering Group was given to understand that the owner of the land was Blenheim Estate. The Steering Group duly informed Blenheim Estate, as the landowner, of the proposed designation.
2. It was therefore surprising that Blenheim disavowed ownership. It should not be inferred from the statement by [REDACTED] in their Representations that “the Trust clearly stated” that the land “belongs to [REDACTED].” The letter from Blenheim to the Parish Council did not assert that the land belonged to [REDACTED], but simply (surprisingly in view of what follows) disavowed ownership by Blenheim.
3. It may be true that the land in question is in a sense “land which belongs to [REDACTED].” There is however a variety of forms of land ownership. Further search of HM Land Registry appears to include “Summary of freehold. Property description: land part of Blenheim estate lying to the west of Stonesfield.” If the information apparently provided by the Land Registry search is to be relied upon, it may not be correct for [REDACTED] to assert that ownership of the land was “wrongly identified.” The owner of the freehold is an owner of the superior interest in land and indeed, pace the Crown (“all land in England and Wales is owned by the Crown”), is seized of the ultimate ownership of the land.
4. [REDACTED] further assert in their Representations “Both families have long established rental agreements on land with the trust over many decades.” Such agreements may be e.g. by way of licence or by way of lease. Loosely speaking, a licensee or leaseholder may exercise a form of “ownership.” However, that is a vernacular use of “ownership,” the ultimate status of which resides at law in the freeholder.

5. [REDACTED] Representations assert that Blenheim responded to the Parish Council on 31 January and the authors ask “why was it not until 26<sup>th</sup> of March that [REDACTED] [REDACTED] were officially contacted?” The answer to this question is that enquiries were made but until shortly before 26 March 2025 there was no clear evidence of ownership and particularly no reason to believe that [REDACTED] were indeed the owners. To this day, notwithstanding any disavowal by Blenheim, the Land Registry appears to indicate that the freehold owner is Blenheim. The Parish Council had served notice upon Blenheim.

#### **Awareness of potential designation as Local Green Space**

[REDACTED] assert that until the letter of 26 March 2025 “we were not aware of the potential designation.” It is surprising if this is so because, notwithstanding no notice having specifically been served upon either of them until service of that letter, publicity before then indicating the potential designation, at least some of which they might have been expected to have been aware of, included: –

- i. the Village Survey in which the views of all residents of the parish on matters including potential LGS designation of the land were sought and largely obtained: –
  - a. the participation rate was high in comparison with the norms for such surveys – 62% of village households completed the Survey and about 45% of the eligible population, compared with a typical response rate in such surveys of about 20%;
  - b. the paper Survey document was delivered in February 2023 to all households, including those of [REDACTED];
  - c. the Survey was also made available online;
  - d. it was open between 1 March and 7 April 2023 and two sets of postcard reminders were delivered to all houses in the NP area, including those of [REDACTED]
- ii. thereafter monthly items were published in the Stonesfield Slate, which circulates throughout the parish, including the households of both [REDACTED], thoroughly and regularly updating residents upon preparation of the draft NP including references to the potential designation of the proposed Local Green Spaces;
- iii. monthly updates on the village website;
- iv. regular posts on the Stonesfield Facebook page which has 979 followers, which posts were then shared with other relevant Stonesfield Facebook groups;
- v. regular information posts on the NextDoor Stonesfield website (subscribed to by around 1000 “neighbours;”
- vi. a public meeting in June 2023, well-publicised in advance and well attended, at which residents were informed of the progress of NP preparation, including preliminary results of the Village Survey and at which those attending were able to ask questions and participate in discussions about all aspects of the proposed NP, including proposed designation of Local Green Spaces, so that the Steering Group was able to take views expressed into account;
- vii. publication of the Survey results, including references to proposed LGS designations, on the village website and making available a printed copy in the Village Library;
- viii. another well-publicised public meeting in the Village Hall in June 2024 to update residents, at which those attending were able to ask questions and participate in discussions, including with reference to proposed LGS designations, so that the steering group was able to take their further views expressed into account;
- ix. NP stands at two Community Cafés in the Village Hall at which preparatory steps were publicised, including reference to proposed LGS designations, and residents had the opportunity to ask questions of parish councillors and steering group members;

- x. a full day stand outside the village shop at which preparatory steps were publicised, including references to proposed LGS designations, and residents had the opportunity to ask questions of parish councillors and steering group members;
- xi. NP stands at two Village Fêtes at which preparatory steps, including references to proposed LGS designations, were publicised and residents had the opportunity to ask questions of parish councillors and steering group members.

**The merits of proposed designation as Local Green Space in accordance with the criteria and other guidance for designation within paragraphs 106 and 107 of the National Planning Policy Framework.**

These are clearly set out in Appendix C of the proposed Neighbourhood Plan and therefore will not be repeated in full here. However, the following is relevant to specific points made by [REDACTED] and [REDACTED]: –

1. Designation would have no consequence for the current uses of the land, e.g. “an arable field and..., currently in a Mid-Tier Country Side (*sic*) Stewardship Scheme.”
2. The identity of the owners of land proposed for designation is irrelevant to compliance with the criteria for designation in paragraph 107 of the NPPF.
3. [REDACTED] do not explain in what way they consider that the designation of the land as Local Green Space would not be consistent with the “local planning of sustainable development” as required by paragraph 106 of the NPPF. There is no suggestion within the West Oxfordshire District Plan or the NPPF that the land might be required for or would be suitable for development providing “homes, jobs and other essential services” in any way which would be frustrated by designation. Indeed, [REDACTED] in their representations specifically concede “we want to make it clear that we are not seeking to develop on the identified land in the plan.”
4. The land is clearly outside the built-up limits of the village and is within the AONB and therefore development of it would be likely to be contrary to relevant District Plan and NPPF policies, e.g. the requirement of paragraph 189 of the NPPF that “Great weight should be given to conserving and enhancing landscape and scenic beauty in..... National Landscapes, which have the highest status of protection in relation to these issues.”
5. Nowhere in the [REDACTED] is it explained why or even suggested that the criteria for designation of the land as a Local Green Space in paragraph 107 of the NPPF are not satisfied, i.e.
  - a. in reasonably close proximity to the community it serves;
  - b. demonstrably special to a local community and holds a particular local significance,
  - c. local in character and not an extensive tract of land.

**Conclusion**

Taking all these matters into account and having considered the issue carefully, the Parish Council does not consider there are valid reasons for withdrawing its proposal within the draft Neighbourhood Plan for the designation of the land south-east of Witney Lane, Stonesfield, as a Local Green Space.

2<sup>nd</sup> April 2025

[REDACTED]  
Stonesfield Parish Council  
Stonesfield Village Hall  
Field Close  
Stonesfield  
OX29 8HA

**Sent via E-mail & By hand**

Ref: Stonesfield Neighbourhood Development Plan

Dear [REDACTED]

Thank you for your letters dated Wednesday 26<sup>th</sup> March delivered we assume by hand and left in our post boxes, notifying ourselves of the Parish Council's intentions with regards to the proposed areas of Local Green Space in the Stonesfield Neighbourhood Plan.

[REDACTED] families for many generations have been owners and "guardians" of land within the village and its surroundings. We have always had the protection and long-term interests of the community and its natural assets as a priority.

However, we are some-what dismayed by the lack of consultation on the proposed Stonesfield Neighbourhood plan, considering land that we both own has been identified in the plan. (Specifically plots 8A and 8B)

Our experience has been poor and is detailed below:

[REDACTED] was only contacted on Sunday 23<sup>rd</sup> March at 6pm by an unexpected phone call from [REDACTED] asking about land ownership in which she was asked, did she own the paddocks on Witney Lane and also to confirm who owned the land further down Witney Lane identified on the plan as plot 8B. She was unsure why she was being contacted and only when asking why they needed to know, was then informed about the Plan.

[REDACTED] even worse, as he happened to be in the Stonesfield Sports and Social club where a conversation was overheard discussing who owned plot 8A, identified on the plan.

Up until these dates no contact had been made with either family to discuss the intentions of the plan.

①

Secondly, on the call to [REDACTED] on Sunday 23rd March at 6pm, [REDACTED] asked whether this could be challenged only to be told it was too late as the survey had already gone out and results were back.

Subsequently, we have reviewed the original proposed plan documentation and both pieces of land were wrongly identified as likely being owned by Vanborough Trust (Blenheim). Both families have long established rental agreements on land with the trust over many decades, both for grazing and as part of [REDACTED] farm and were surprised that the opposite side of Witney Lane locally known as the "triangle" and currently under a grazing contract between [REDACTED] and [REDACTED] had not been identified as a Local Green space if we are being consistent.

There are many other areas of the village which also seem to have not been considered or perhaps they were but not put in the plan after speaking with landowners. This is unclear to us. We would like to understand which areas were considered but did not make it into the final plan.

We are very aware of the emotion attached to development over the recent years concerning Blenheim, both within our Stonesfield community and beyond in the immediate surrounding areas, which can often influence people's opinion when potentially related to future development plans for housing.

What both families are keen to understand, is how land was identified in the first instance to be put into the survey for people to share their views. As previously mentioned as landowners, we were not even consulted about the prospect of this. We would request a response detailing exactly who was involved and how these pieces of land were identified and by what authority they could represent the village in doing so.

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To this point, why was it not until 26th March that [REDACTED] were officially contacted?

In your letter dated 26th March, you kindly enclosed Appendix C of the now rightly identifying ownership of plots 8A and 8B. It appears that this is clearly an amendment and has bullet points highlighted as attached.

It should be noted that up until this letter, we were not aware of the potential designation and we had not been informed of the parish councils' desire to designate the field as an LGS. This should be included.

(2)

We do believe therefore that the survey sent out and subsequent survey feedback is now invalid as given:

1. That the land was wrongly identified as owned by [REDACTED]
2. [REDACTED] had not been made aware of their land's inclusion in the plan and potential designation of the land as Local Green Space is not valid as incorrect information has been provided to potential survey respondents.
3. Plot 8a is an arable field and is currently in a Mid-Tier Country Side Stewardship Scheme, and naming the field a "Paddock" gives the wrong impression for the survey.
4. As an extra point, [REDACTED] the field known as plot 1 on a long-term tenancy on the Neighbourhood Development Plan and this is also an arable field and currently in a Mid-Tier Country Side Stewardship Scheme. As he rents this, from Blenheim, if not already, they will be in touch concerning this.

The survey now should be re-issued with the correct information.

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Local Green Space designations to be consistent with the local planning of sustainable development and complement the delivery of sufficient homes, jobs and other essential services. Whilst there is no requirement for neighbourhood plans to allocate land for development, it is a basic condition that neighbourhood plans must contribute to the achievement of sustainable development.

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Various constraints to development mean that there are only limited opportunities to provide for sustainable growth in and around Stonesfield.

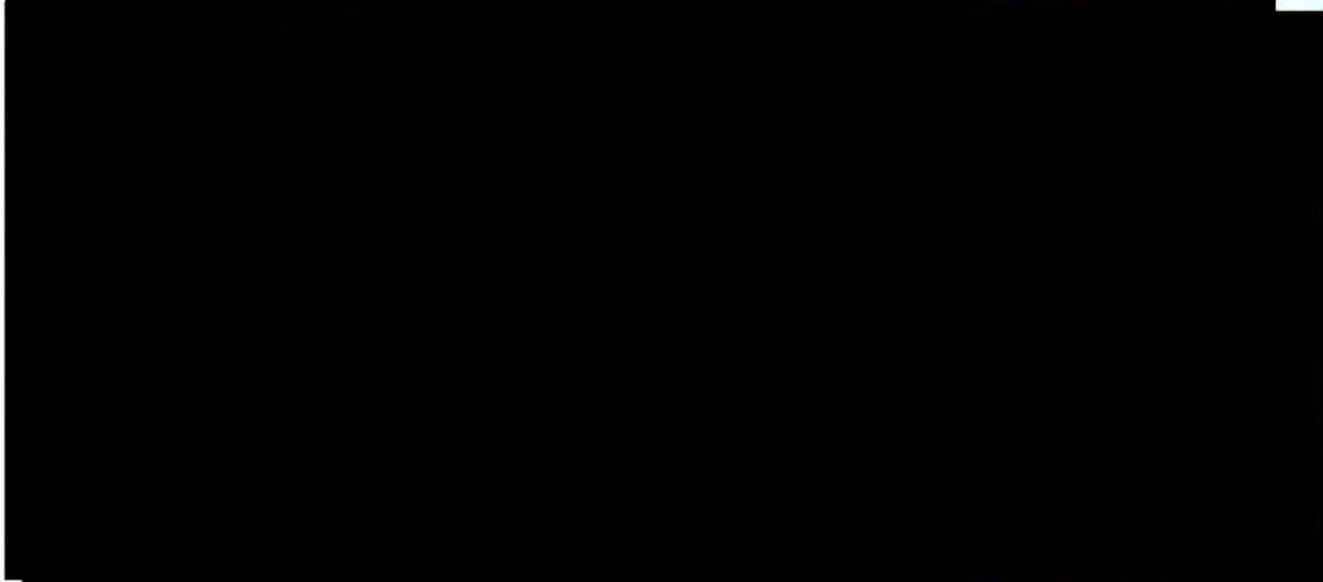
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We are disappointed and feel we have been overlooked in this process especially as the families have been an active and supportive part of the community for many generations and are surely owed some common curtesy and engagement when plans like this are being developed.

Kind Regards



④

# Stonesfield Parish Council

Stonesfield Village Hall, Field Close, Stonesfield, OX29 8HA

Email: clerk@stonesfieldpc.uk



1 October 2025



## **Stonesfield Neighbourhood Plan – possible designation of land owned by you as a Local Green Space.**

Thank you for your written representations in response to my letter of 26 March 2025. I am sorry for the delay in replying to those. That has been occasioned largely because of the very considerable work it has been necessary to do in giving careful consideration to the several representations made by owners of all the parcels of land proposed for designation, deciding what action should be taken in the light of those representations and drafting responses. That work is time-consuming and we are reliant upon the goodwill and unpaid work of volunteers to assist us in preparation for deliberations by parish councillors.

I attach the Parish Council's consideration of your submissions, of its determination and the reasons for that determination.

Yours sincerely,



*Chair of Stonesfield Parish Council.*

## Parish Council response

Proposed Stonesfield Neighbourhood Plan.  
Proposed Local Green Spaces Designation.  
Land south-east of Witney Lane, Stonesfield.

Representations by letter to the Chair of Stonesfield Parish Council dated 2 April 2025 by [REDACTED]  
[REDACTED]

The Stonesfield Parish Council ("SPC") has carefully considered the Laughton-Stobo Representations and its consideration and conclusions are summarised as follows: –

### **Identification of ownership.**

[REDACTED] are understandably dissatisfied that the proposed designation of the land came to their attention late in the process. The Parish Council regrets this but hopes that [REDACTED] and [REDACTED] may understand that all efforts were made to ascertain the ownership of the land and to consult the "owners." [REDACTED] say that "both pieces of land were wrongly identified as likely being owned by Vanbrugh Trust (Blenheim)" and "We are aware that a letter was sent to Blenheim concerning the plan sharing with them potential land identified on 6 December 2024 to which they responded on the 31<sup>st</sup> January. In this response the Trust clearly stated they did not own the land which belongs to [REDACTED]. To this point, why was it not until 26<sup>th</sup> of March that [REDACTED] were officially contacted?"

1. The starting point for identifying ownership of land which is in question is HM Land Registry. A search of the area of land in question at the Registry, identified by its location on the relevant map, appeared to result in a statement of ownership as follows: "Land part of Blenheim Estate lying to the west of Stonesfield." It was by this means that the Neighbourhood Plan Steering Group was given to understand that the owner of the land was Blenheim Estate. The Steering Group duly informed Blenheim Estate, as the landowner, of the proposed designation.
2. It was therefore surprising that Blenheim disavowed ownership. It should not be inferred from the statement by [REDACTED] in their Representations that "the Trust clearly stated" that the land "belongs to [REDACTED]." The letter from Blenheim to the Parish Council did not assert that the land belonged to [REDACTED], but simply (surprisingly in view of what follows) disavowed ownership by Blenheim.
3. It may be true that the land in question is in a sense "land which belongs to [REDACTED]." There is however a variety of forms of land ownership. Further search of HM Land Registry appears to include "Summary of freehold. Property description: land part of Blenheim estate lying to the west of Stonesfield." If the information apparently provided by the Land Registry search is to be relied upon, it may not be correct for [REDACTED] to assert that ownership of the land was "wrongly identified." The owner of the freehold is an owner of the superior interest in land and indeed, pace the Crown ("all land in England and Wales is owned by the Crown"), is seized of the ultimate ownership of the land.
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5. [REDACTED] Representations assert that Blenheim responded to the Parish Council on 31 January and the authors ask “why was it not until 26<sup>th</sup> of March that [REDACTED] [REDACTED] were officially contacted?” The answer to this question is that enquiries were made but until shortly before 26 March 2025 there was no clear evidence of ownership and particularly no reason to believe that [REDACTED] were indeed the owners. To this day, notwithstanding any disavowal by Blenheim, the Land Registry appears to indicate that the freehold owner is Blenheim. The Parish Council had served notice upon Blenheim.

#### **Awareness of potential designation as Local Green Space**

[REDACTED] assert that until the letter of 26 March 2025 “we were not aware of the potential designation.” It is surprising if this is so because, notwithstanding no notice having specifically been served upon either of them until service of that letter, publicity before then indicating the potential designation, at least some of which they might have been expected to have been aware of, included: –

- i. the Village Survey in which the views of all residents of the parish on matters including potential LGS designation of the land were sought and largely obtained: –
  - a. the participation rate was high in comparison with the norms for such surveys – 62% of village households completed the Survey and about 45% of the eligible population, compared with a typical response rate in such surveys of about 20%;
  - b. the paper Survey document was delivered in February 2023 to all households, including those of [REDACTED]
  - c. the Survey was also made available online;
  - d. it was open between 1 March and 7 April 2023 and two sets of postcard reminders were delivered to all houses in the NP area, including those of [REDACTED]
- ii. thereafter monthly items were published in the Stonesfield Slate, which circulates throughout the parish, including the households of both [REDACTED], thoroughly and regularly updating residents upon preparation of the draft NP including references to the potential designation of the proposed Local Green Spaces;
- iii. monthly updates on the village website;
- iv. regular posts on the Stonesfield Facebook page which has 979 followers, which posts were then shared with other relevant Stonesfield Facebook groups;
- v. regular information posts on the NextDoor Stonesfield website (subscribed to by around 1000 “neighbours;”
- vi. a public meeting in June 2023, well-publicised in advance and well attended, at which residents were informed of the progress of NP preparation, including preliminary results of the Village Survey and at which those attending were able to ask questions and participate in discussions about all aspects of the proposed NP, including proposed designation of Local Green Spaces, so that the Steering Group was able to take views expressed into account;
- vii. publication of the Survey results, including references to proposed LGS designations, on the village website and making available a printed copy in the Village Library;
- viii. another well-publicised public meeting in the Village Hall in June 2024 to update residents, at which those attending were able to ask questions and participate in discussions, including with reference to proposed LGS designations, so that the steering group was able to take their further views expressed into account;
- ix. NP stands at two Community Cafés in the Village Hall at which preparatory steps were publicised, including reference to proposed LGS designations, and residents had the opportunity to ask questions of parish councillors and steering group members;

- x. a full day stand outside the village shop at which preparatory steps were publicised, including references to proposed LGS designations, and residents had the opportunity to ask questions of parish councillors and steering group members;
- xi. NP stands at two Village Fêtes at which preparatory steps, including references to proposed LGS designations, were publicised and residents had the opportunity to ask questions of parish councillors and steering group members.

**The merits of proposed designation as Local Green Space in accordance with the criteria and other guidance for designation within paragraphs 106 and 107 of the National Planning Policy Framework.**

These are clearly set out in Appendix C of the proposed Neighbourhood Plan and therefore will not be repeated in full here. However, the following is relevant to specific points made by [REDACTED] and [REDACTED]

1. Designation would have no consequence for the current uses of the land, e.g. “an arable field and..., currently in a Mid-Tier Country Side (*sic*) Stewardship Scheme.”
2. The identity of the owners of land proposed for designation is irrelevant to compliance with the criteria for designation in paragraph 107 of the NPPF.
3. [REDACTED] do not explain in what way they consider that the designation of the land as Local Green Space would not be consistent with the “local planning of sustainable development” as required by paragraph 106 of the NPPF. There is no suggestion within the West Oxfordshire District Plan or the NPPF that the land might be required for or would be suitable for development providing “homes, jobs and other essential services” in any way which would be frustrated by designation. Indeed, [REDACTED] in their representations specifically concede “we want to make it clear that we are not seeking to develop on the identified land in the plan.”
4. The land is clearly outside the built-up limits of the village and is within the AONB and therefore development of it would be likely to be contrary to relevant District Plan and NPPF policies, e.g. the requirement of paragraph 189 of the NPPF that “Great weight should be given to conserving and enhancing landscape and scenic beauty in..... National Landscapes, which have the highest status of protection in relation to these issues.”
5. Nowhere in the [REDACTED] is it explained why or even suggested that the criteria for designation of the land as a Local Green Space in paragraph 107 of the NPPF are not satisfied, i.e.
  - a. in reasonably close proximity to the community it serves;
  - b. demonstrably special to a local community and holds a particular local significance,
  - c. local in character and not an extensive tract of land.

**Conclusion**

Taking all these matters into account and having considered the issue carefully, the Parish Council does not consider there are valid reasons for withdrawing its proposal within the draft Neighbourhood Plan for the designation of the land south-east of Witney Lane, Stonesfield, as a Local Green Space.

# Stonesfield Parish Council

Stonesfield Village Hall, Field Close, Stonesfield, OX29 8HA

Email: [clerk@stonesfieldpc.uk](mailto:clerk@stonesfieldpc.uk)

Mr Ashley Maltman, MRTPI,  
Head of Planning,  
Blenheim Estate,  
Woodstock,  
Oxfordshire OX28 1PP.

Email: [estate@blenheimpalace.com](mailto:estate@blenheimpalace.com)

1 October 2025

Dear Mr Maltman,

**Stonesfield Neighbourhood Plan – possible designation of land owned by Blenheim Estate as a Local Green Space: (1) Paddocks south of Witney Lane, (2) Land south-east of William Buckland Way (3) The Dene (4) Woodstock Road allotments.**

Thank you for your written representations of 31 January 2025 on behalf of the Blenheim Estate in response to my letter of 6 December 2024. I am sorry for the delay in replying to those. That has been occasioned largely because of the very considerable work it has been necessary to do in giving careful consideration to the several representations made by owners of all the parcels of land proposed for designation, deciding what action should be taken in the light of those representations and drafting responses. That work is time-consuming and we are reliant upon the goodwill and unpaid work of volunteers to assist us in preparation for deliberations by parish councillors.

We note your indication you are not the landowner of the fields south of Witney Lane. We have now communicated with those who have informed us they are the owners.

We are pleased that you support the designation of the The Dene and the Woodstock Road allotments. Thank you for your support.

I attach/enclose a note of the Parish Council's consideration of your submissions about the land south-east of William Buckland Way, of its determinations and the reasons for those determinations.

Yours sincerely,



*Chair of Stonesfield Parish Council.*

## Parish Council response

22 March 2025.

### **Consideration of representations resisting designations as Local Green Spaces.**

The field south-east of William Buckland Way (“the WBW Land”) – Representations dated 31 January 2025 by Blenheim Estate (“the Blenheim WBW Representations”).

The Stonesfield Parish Council (“SPC”) has carefully considered the Blenheim WBW Representations and its consideration and conclusions are summarised as follows.

The designation of this land and indeed other land by the draft Neighbourhood Plan as a Local Green Space is based on perceived satisfaction of the three conditions required by paragraph 107 of the National Planning Policy Framework (“NPPF”) to be fulfilled before land is designated, i.e. land designated must be: –

- a. in reasonably close proximity to the community it serves;
- b. demonstrably special to the local community and hold 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 not an extensive tract of land.

The Parish Council does not understand the Blenheim WBW Representations to bring into issue satisfaction of any of the three conditions, i.e. “close proximity to the community” and “local in character and ... not an extensive tract of land.” The Representations focus rather upon: –

- i. the potential contribution of development on the WBW Land to the 5 Year Housing Land Supply within West Oxfordshire and
- ii. “scope for the sustainable development of a limited number of affordable and market dwellings that can appropriately contribute to the settlement’s housing needs.”

Appendix C of the draft Neighbourhood Plan sets out in detail why SPC considers the three conditions required by paragraph 107 of the NPPF are fulfilled and therefore the justification will not be repeated here, except insofar as it relates to the Housing Land Supply and sustainable development contentions of the Blenheim WBW Representations.

### **Housing Land Supply.**

Blenheim asserts that

- A. West Oxfordshire District Council “does not have a 5 Year Housing Land Supply and further to changes in national policy regarding housing requirements, it must provide for significantly more housing land than previously anticipated;”
- B. “Settlements across the District, including those within the Cotswolds National Landscape, will need to contribute to the delivery of the affordable and market housing required in West Oxfordshire.”

Stonesfield is in what is, by statutory designation, the Cotswolds Area of Outstanding Natural Beauty (“AONB”). The Blenheim WBW Representations refer to this as the Cotswolds National Landscape. This response will use the statutory designation of AONB, as legal and policy requirements flow from

that. The AONB is adjacent to the World Heritage Site of Blenheim Palace and Park. The WBW land is alongside the highway approach to the village from the East, which is one of two entrances to the AONB from the direction of Blenheim (the other being the Woodstock Road). It is also adjacent to the Oxfordshire Way/Akeman Street much walked and cycled footpath/bridleway which runs through the AONB. The WBW Land is near to both the vehicular and footpath routes and is cherished by both residents of Stonesfield and the wider public for its beauty, historic significance, recreational value, tranquillity and richness of wildlife. The significance of this is recognised in both the Parish Council's Local Landscape Assessment and in the decision of Stephen Normington, the Planning Inspector in the planning appeal by Cala Homes in 2019 (Appeal Decision dated 21 June 2019 APAP/D 3125/W/18/3209551), relating to the nearby Woodstock Road land.

The author of the Landscape Assessment, having noted the "strong rural character" of the landscape on this side of Stonesfield, i.e. "the Stonesfield Inner Fields," points out at page 49 para 6 that it "forms part of the rural landscape setting when approaching Stonesfield from two of the four roads that converge in the village," one of which is the Combe Road which borders the WBW Land. At page 48 para 3 of the Landscape Assessment the author, referring to what is now known as the William Buckland Way development, said the "Recent housing development at Charity Farm has created a hard edge to the village in these views, and additional development will further threaten the integrity of its valued rural character." The views with which the author was concerned were those of the village from the Oxfordshire Way/Akeman Street, which passes the village in the dip slope valley adjacent to this side of Stonesfield. The Landscape Assessment recognises that this is part of the "rural landscape setting for the settlement" which "contributes to the special qualities of the Cotswolds Area of Outstanding Natural Beauty" and is one of the "Remaining pockets of pastoral land on the southern edge of the village" which "add to the settlement's sense of time depth and survive as remnants of historic field enclosures." (Page 50 Landscape Assessment).

Stephen Normington, the Planning Inspector in the Cala Planning Appeal Decision relating to the nearby Woodstock Road land, expressed similar serious concern about the harmful effect of development in these fields upon the AONB setting of the village. Agreeing with the Landscape Assessment, he said at paragraph 52 of the Appeal Decision that from the Akeman Street footpath "current views looking towards the village on this approach are dominated by the incongruity of the Charity Farm development, which, owing to its urban form and materials, appears as a disjointed protrusion into the rural landscape and displays little integration with the rest of the village." He was concerned that to users of Akeman Street, in views looking north-west from the Oxfordshire Way, should the Cala proposal have been accepted, "The cumulative visual impact of the existing and proposed development when viewed from Oxfordshire Way would fundamentally and unacceptably change the characteristic open character of the dip slope lowland" and the village would appear as more of a modern 'suburbanisation' of a rural settlement within the AONB." All this would apply a fortiori to development of the WBW Land, which is closer and more visible than the Woodstock Road land, to users of the Oxfordshire Way and to those approaching Stonesfield along the Combe Road.

Paragraph 187 of the NPPF requires planning policies and decisions to contribute to and enhance the natural and local environment, inter alia, by protecting and enhancing valued landscapes, and paragraph 189 stipulates that "Great weight should be given to conserving and enhancing landscape and scenic beauty in National Landscapes" i.e. Areas of Outstanding Natural Beauty. Paragraph 190 of the NPPF requires the refusal, in the AONB, of planning permission for major development (defined in the NPPF glossary as "For housing, development where 10 or more homes will be provided, or the site has an area of 0.5 ha or more"), other than in exceptional circumstances and where it can be demonstrated that the development is in the public interest. Any development of the WBW Land, 2.6 ha in extent, likely to be proposed would be a "major development." Indeed, for development of the WBW Land to make a significant contribution to the West Oxfordshire District Council 5 Year Housing

Land Supply it would require to be a “major development.” To be acceptable in the AONB therefore it would need to satisfy both the “exceptional circumstances” and “public interest” tests. After a public inquiry of five days, including voluminous oral and written witness evidence and submissions by Queen’s Counsel, Mr Normington determined that a proposal to which applied very similar considerations to those which would apply to any major development on the WBW Land did not satisfy the two tests. A major development on the WBW Land would not satisfy them either.

Any suggestion that “unmet housing need” would constitute either exceptional circumstances or a public interest justifying major development, which Planning Inspector Normington rejected in the Cala appeal, is also shown to be ill-founded by the very thorough Housing Needs Assessment carried out during preparation of the draft Stonesfield Neighbourhood Plan. This Assessment concluded at pages 36 and 37 that the housing market in the existing built housing stock of the village would satisfy any relevant need for market housing: –

1. It is projected that the housing market will satisfy local need for anyone in the settlement seeking to move in the next five years, with significant excess capacity to cater for anyone who might wish to move but didn’t identify as knowing their future intentions at the date of the survey. There is no requirement for additional market housing and no requirement for a major development.
2. There may be a very small shortfall of social/affordable housing in the next five years.
3. There may be a case to deliver more social/affordable homes for people with a local (Stonesfield) connection which could be met via a small rural exception site.

There is no evidence base to support assertion A above of Blenheim WBW Representations. The most recent WODC Local Plan 2041 Consultation Summary Report is that of February 2024. In it the District Council at 3.108 recorded what it had said in the process of Consultation: “National policy and initial feedback on the local plan so far emphasise the need for the intrinsic character and beauty of the countryside to be recognised, protected and wherever possible enhanced. This is a particularly important issue for West Oxfordshire which has distinctive and varied countryside, contributing to the District’s character including the Cotswolds National Landscape.” The Report says at 3.114 “Comments expressed concerns regarding the (*sic*) development within designated landscapes such as the Cotswolds National Landscape, Green Belt and other protected areas. The consensus is that any development in these sensitive areas should be exceptional and meet specifically identified local needs.”

Planning Inspector Stephen Normington at paragraph 60 of his Appeal Decision in the Cala case took the view that “local housing need means need of a specific settlement.” That need, in the specific settlement of Stonesfield, as the Neighbourhood Plan Housing Needs Assessment established, will in the foreseeable future be “a very small shortfall of small affordable housing” which may be met by a small rural exception site comprising social/affordable homes for people with a local connection.

Therefore, any increase in housing provision by way of major development within West Oxfordshire District is overwhelmingly likely to be met in settlements outside the AONB and Stonesfield will not, as the Blenheim WBW Representations claim, “need to contribute to the delivery of the affordable and market housing required in West Oxfordshire.”

**Sustainable development of a limited number of affordable and market dwellings that can appropriately contribute to the settlement’s housing needs.”**

It follows from the above that, in the foreseeable future, except as may be provided by small rural exception site, there will be no need for contribution to the settlement’s housing needs by “a limited number of affordable and market dwellings.” There remains however the question of what constitutes

“sustainable development” in this context. There is no explanation in the Blenheim WBW Representations of what Blenheim means by “sustainable” in this context. Planning policy, e.g. the National Planning Policy Framework (the NPPF) and West Oxfordshire Local Plan (WOLP), require development where possible to be “sustainable” and indeed, *ceteris paribus*, includes a presumption in favour of sustainable development. The meaning of “sustainable” in a planning context has been a matter of considerable debate. It has achieved the status of motherhood and apple pie whilst rarely, if ever, being concisely defined. Central government’s Sustainable Development Management Plan 2020/25 (“the Management Plan”) produced by Public Health England in August 2020 explains its understanding of the priorities entailed by sustainability, including:

1. sustainable consumption and production;
2. climate change and energy;
3. natural resource protection and environmental enhancement;
4. sustainable communities.

The Management Plan acknowledges as one of the most used definitions of “sustainable development” that given at the Rio “Earth Summit” in 1992 by the Chairperson Gro Harlem Brundtland, i.e. “Development that meets the need of the present generation without compromising the needs of future generations to meet their own needs.” This objective is acknowledged in paragraph 7 of the NPPF. The NPPF, at paragraph 8, stipulates three overarching objectives for achieving sustainable development i.e. an economic objective, a social objective and an environmental objective. Any development proposals for the WBW Land would have to be judged against these considerations. The Cala planning inspector so assessed the Woodstock Road field and determined that the proposals then made were unacceptable. Taking into account the reasons he gave for his decision to reject the Cala Appeal, it is impossible to envisage a realistic proposal for major development on the WBW Land being in accordance with relevant planning policy.

Equally importantly Blenheim, in the WBW Representations, makes no attempt to explain how what it calls “the sustainable development of a limited number of affordable and market dwellings” would contribute to the four priorities of the central government Management Plan, slightly differently expressed as the three overarching objectives of the NPPF in relation to sustainability. Going back to sustainability basics, the Blenheim WBW Representations simply do not address the need to explain why such market development, in the context analysed by the Neighbourhood Plan Housing Needs Assessment, would be consistent with the Brundtland notion of sustainability expressed at the Rio “Earth Summit” in 1992 i.e. “Development that meets the need of the present generation without compromising the needs of future generations to meet their own needs.” The Housing Needs Assessment makes it clear that the housing needs of the present generation do not require more market housing in Stonesfield. The Landscape Assessment and the contents of the Cala planning appeal decision of Planning Inspector Stephen Normington make it clear that needs of future generations, including the right to enjoy “the special qualities of the Cotswolds Area of Outstanding Natural Beauty,” would be prejudiced by more such development and would be at odds with the requirement of paragraph 189 of the NPPF that “Great weight should be given to conserving and enhancing landscape and scenic beauty in National Landscapes”

## **Conclusion**

Taking all these matters into account and having considered the issue carefully, the Parish Council does not consider there are valid reasons for withdrawing its proposal within the draft Neighbourhood Plan for the designation of the land north of Woodstock Road as a Local Green Space.

On 23 September 2025 [REDACTED] replied as follows: –

Dear [REDACTED]

Following up on our call earlier with [REDACTED], we're writing to confirm that our main concern was to gain clarity on what defines a Local Green Space (LGS), and to seek reassurance that we can continue using the land for agricultural purposes, as it has historically been used, during the Garage's ownership and previously under [REDACTED]

[REDACTED] would probably have preferred that the land not be included in the Plan as it is unsuitable anyway for development, being on a hill and access via the garage, and he is concerned that there might be potential for future interpretation of the LGS designation, and the possibility that the field may be viewed more as a visual or environmental amenity than an agricultural site. However, we understand the concern to protect local green spaces and reassured by your guidance that the agricultural purpose of the land remains unchanged.

[REDACTED] have already planted wildflower mixtures in the field, and [REDACTED] is keen to plant some trees in the autumn. Thank you for passing on [REDACTED] name and we may well reach out to him for advice or support with this.

Thanks again for your time.

Kind regards

[REDACTED]

**Cheryl Miller**

Property Coordinator

**Carter Jonas**

[REDACTED]

[REDACTED]

1 October 2025

Dear [REDACTED],

**Stonesfield Neighbourhood Plan – possible designation of land behind Stonesfield Garage as a Local Green Space.**

Thank you for your recent discussions and email communication with the Chair of our Neighbourhood Plan Steering Group. I attach a formal note of the Parish Council's decision to propose designation of land behind Stonesfield Garage as a Local Green Space.

Yours sincerely,

[REDACTED]

*Chair of Stonesfield Parish Council.*

**Parish Council response to [REDACTED].**

25 September 2025.

Consideration of representations expressing no objection to designation as Local Green Space.

Land to the rear of Stonesfield Garage.

Notice of the proposal to designate as a Local Green Space land to the rear of Stonesfield Garage was served on 6 December 2024 upon [REDACTED] by way of recorded delivery letter. No reply was received.

The absence of any reply was drawn to the attention of [REDACTED] and he was provided with a further copy of the letter of 6 December 2024. This was confirmed by email on 21 September 2025 as follows: –

Dear [REDACTED],

This is to confirm the gist of our conversation in the street on Friday just gone. I preface what follows with the stricture that nothing in this email should be taken as legal advice to you or anyone else who may read it. If you want legal advice, you should seek it from a suitably qualified lawyer of your choice.

1. I understand the PC served on you by registered post the letter a copy of which I have now provided you with through your brother and business partner, [REDACTED]
2. You told me you do not recall receiving the letter when it was sent in December 2024.
3. I said the proposal to designate in the proposed Neighbourhood Plan for Stonesfield the land behind the garage as a “Local Green Space,” if approved, could render getting certain planning permissions for development on the land more difficult if not impossible.
4. You might want to take advice, eg from a planning consultant or lawyer.
5. Decisions in this matter are not for me to make. I am merely a member of the PCs Neighbourhood Plan Steering Group. I am that simply by virtue of being a volunteer and being appointed to the Steering Group as such by the PC.
6. Strictly you are “out of time” to make representations at this stage of the process on the issue, eg to argue why the land should not be designated. However if you were to make representations and ask the PC to consider them out of time I think it would be open to the PC to do so or to decide not to do so. If they did agree to consider them out of time, they could either decide to accept your representations were well made and decide no longer to propose the land as Local Green Space or they could decide, notwithstanding your representations, to proceed with the proposed designation.
7. You may want to let me know whether or not you intend to make representations and indicate when they will be with the PC so the Steering Group could warn the PC something will be coming.
8. The proposed plan has already been approved for submission to the District Council who eventually have to approve, amend or reject it in due course, so there is little if any time to spare if representations to the PC are to be considered before submission of the proposal to the DC. It had been hoped the proposal would be submitted within the next few weeks if not days. The PC might in any event decide not to wait and to submit the plan proposal without first considering any representations you might want to make. All I can say is that you may want to ask them to consider representations even at this late stage.
9. I should therefore be grateful if you would let me know within 48 hours what you intend to do.
10. This has all arisen now because I noticed, when doing some admin work for the Steering Group on the LGS proposals, that you were one of a very small number of landowners who had

not replied either with representations or an indication of agreement for the land to be designated and support for it.

I look forward to hearing from you within the next couple of days.

I am copying this to [REDACTED] because he is [REDACTED]

Best wishes,

[REDACTED]

On 23 September 2025 [REDACTED] replied as follows: –

Dear [REDACTED]

Following up on our call earlier with [REDACTED], we're writing to confirm that our main concern was to gain clarity on what defines a Local Green Space (LGS), and to seek reassurance that we can continue using the land for agricultural purposes, as it has historically been used, during the Garage's ownership and previously under [REDACTED].

[REDACTED] would probably have preferred that the land not be included in the Plan as it is unsuitable anyway for development, being on a hill and access via the garage, and he is concerned that there might be potential for future interpretation of the LGS designation, and the possibility that the field may be viewed more as a visual or environmental amenity than an agricultural site. However, we understand the concern to protect local green spaces and reassured by your guidance that the agricultural purpose of the land remains unchanged.

[REDACTED] have already planted wildflower mixtures in the field, and [REDACTED] is keen to plant some trees in the autumn. Thank you for passing on [REDACTED] name and we may well reach out to him for advice or support with this.

Thanks again for your time.

[REDACTED]

**Cheryl Miller**

Property Coordinator

## Carter Jonas

This reply was acknowledged as follows on 23 September 2025: –

Dear [REDACTED],

Thanks for your recent prompt consideration of this following our recent reminder. It will help us avoid delay in the submission of the proposed Neighbourhood Plan to the District Council.

Thank you also for taking such a constructive view of the matter. We shall take it, unless you indicate to the contrary, that you have no further representations to make and that the matter rests with your submission as below.

Best wishes,

[REDACTED]

### **Conclusion**

Taking all relevant matters into account, particularly the absence of any objection by the Millers, and having considered the issue carefully, the Parish Council decided to proceed with the proposal for designation of the land behind Stonesfield Garage as a Local Green Space. In the light of later communication by the [REDACTED] indicating no objection, it has not been considered necessary for the Parish Council to reconsider its decision.

# Stonesfield Parish Council

Stonesfield Village Hall, Field Close, Stonesfield, OX29 8HA

Email: clerk@stonesfieldpc.uk

Friday 6 December 2024

Cottsway Housing Association Limited,  
Cottsway House,  
Heynes Place, Avenue Two,  
Witney, Oxfordshire  
OX28 4YG

Dear Sir or Madam

## **Stonesfield Neighbourhood Development Plan – possible designation of land owned by you as a Local Green Space.**

I am writing to you as I believe you are the owner / occupier of the land at: land at the corner of Pond Hill and Longore which has been identified as a likely site for designation as a Local Green Space in the draft Stonesfield Neighbourhood Development Plan (“the Neighbourhood Plan”).

### **The relevance of the proposed Stonesfield Neighbourhood Plan**

If the Neighbourhood Plan (“the NP”) is adopted it will be a significant consideration in the determination of any application for planning permission within the parish of Stonesfield

### **The process of preparing the draft Neighbourhood Plan**

Stonesfield Parish Council (“SPC”) is the qualifying body for preparing the Neighbourhood Plan for Stonesfield Parish. For further information, you can find details about Neighbourhood Plans at [www.gov.uk/guidance/neighbourhood-planning--2](http://www.gov.uk/guidance/neighbourhood-planning--2) and more specifically the Stonesfield Neighbourhood Plan at <https://stonesfield.online/neighbourhood-plan/> which has information about the Steering Group (SG) set up to develop the Plan under the auspices of the Parish Council. The SG undertook a detailed Village Survey and the answers to the survey form part of the evidence upon which the NP will be based. This included establishing residents’ views on Green Spaces.

### **Further information about Local Green Spaces**

Information can be found within the National Planning Policy Framework (NPPF), paragraphs 102-107, which can be found on the Government website and also online at: [Open space, sports and recreation facilities, public rights of way and local green space - GOV.UK](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/426122/Open_space_sports_and_recreation_facilities_public_rights_of_way_and_local_green_space_-_GOV.UK.pdf). Important to note, the NPPF provides protection from development through designation as a Local Green Space and is characterised as being “consistent with that in respect of Green Belt.”

### **Your land**

The draft NP includes a number of proposed Local Green Spaces (“LGS”). Your land is one of these. The proposed LGS within the draft NP have been proposed on the basis of

evidence which includes the contents of an independent Local Landscape Assessment and the results of the Village Survey, referred to above, supporting the proposed designations. We believe the proposals are also consistent with the criteria in the NPPF.

It is not a prerequisite that the landowner should consent to designation. Where landowners do not agree to designation however, their views will of course be taken into account in the final assessment of suitability for designation by the SG and SPC prior to submission for assessment by West Oxfordshire District Council and an independent planning inspector, with whom the final decision rests.

**How to respond**

Please email or write to Stonesfield Parish Council at the above address with your views on the possible designation of the land shown on the attached plan as a LSG, and, in particular, whether you consider it meets the NPPF criteria and, if you do not, your reasons for thinking it does not. Please include any other relevant representations.

If you are neither the owner nor the occupier of the land, please let me know at the above address.

As nearly all the sites are either in the public domain or visible from it, I do not suggest the arrangement of a formal site visit but shall do so if requested.

Please ensure your written representations are submitted by 31 January 2025.

Yours sincerely,



*Chair of Stonesfield Parish Council*

From: [REDACTED]  
Sent: Wednesday, June 11, 2025 10:51 AM  
To: Stonesfield Clerk <[clerk@stonesfieldpc.uk](mailto:clerk@stonesfieldpc.uk)>  
Subject: Stonesfield Primary School Playing Field

FAO [REDACTED]

[REDACTED], I have been passed the attached letter by my client Oxfordshire County Council (OCC) Property. OCC owns the proposed LGS school site. I believe we have contacted the Parish recently about other proposed LGS sites too.

My client is a local authority and is charged with managing the land that they own in the public interest – in this case it is held for primary school purposes. They have certain duties in respect of that land, including using it for school purposes. Local Green Space designations can lead to unintended consequences meaning that it then becomes very difficult or impossible to carry out any development that may be required in the future (eg temporary or permanent classrooms; sports / play facilities etc) because the LGS designation gives the land the same status as Green Belt, where the planning policy constraints are very tight with a presumption of harm arising from all development (other than in very limited circumstances).

In addition I would direct you to the Government's planning practice guidance which clearly states the following:

***“What if land is already protected by designations such as National Park, Area of Outstanding Natural Beauty, Site of Special Scientific Interest, Scheduled Monument or conservation area?”***

*Different types of designations are intended to achieve different purposes. If land is already protected by designation, then consideration should be given to whether any additional local benefit would be gained by designation as Local Green Space.*

*Paragraph: 011 Reference ID: 37-011-20140306 Revision date: 06 03 2014”*

In this instance as can be seen from the attached maps, the site lies within both the Conservation Area, the Cotswold National Landscape, and it is within the setting of Austin's Farmhouse (Grade II listed). There is therefore no additional benefit in designating this site as a LGS as the land is already heavily constrained in planning terms. There are also other concerns with the degree to which this site would comply with the designation requirements.

If it would assist, I can refer you to other situations locally where we have worked with Neighbourhood Plan groups (eg Charlbury / Milton under Wychwood etc) to ensure that County Council-owned land is not designated as Local Green Space so as to avoid the situation described above from occurring. To that end I would be pleased to meet with your NP representatives on Teams to seek a way forward. Perhaps you could indicate if they would be willing to meet in the first instance?

In the meantime if you have any questions please do not hesitate to contact me.

Best regards,

[REDACTED]

[REDACTED]

[REDACTED]



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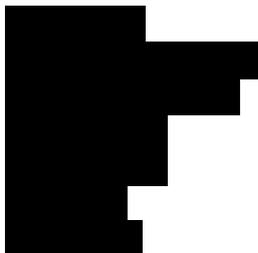
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# Stonesfield Parish Council

Stonesfield Village Hall, Field Close, Stonesfield, OX29 8HA

Email: clerk@stonesfieldpc.uk



1 October 2025

Dear Mr Flawn,

**Stonesfield Neighbourhood Plan – possible designation of land owned by Oxfordshire County Council as a Local Green Space: Stonesfield Primary School Playing Field.**

Thank you for your written representations on behalf of the Oxfordshire County Council in response to my letter of 6 December 2024. I am sorry for the delay in replying to those. That has been occasioned largely because of the very considerable work it has been necessary to do in giving careful consideration to the several representations made by owners of all the parcels of land proposed for designation, deciding what action should be taken in the light of those representations and drafting responses. That work is time-consuming and we are reliant upon the goodwill and unpaid work of volunteers to assist us in preparation for deliberations by parish councillors.

I attach/enclose a note of the Parish Council's consideration of your submissions, of its determinations and the reasons for those determinations.

Yours sincerely,



*Chair of Stonesfield Parish Council.*

## **Parish Council response**

4 September 2025

### **Consideration of representations resisting designations as Local Green Spaces.**

The School Playing Field representations dated 21 January by the Advisor to Oxfordshire County Council

The Stonesfield Parish Council (“SPC”) has carefully considered the Representations on behalf of Oxfordshire County Council and its consideration and conclusions are summarised as follows.

It is accepted that Playing Fields already have a degree of protection under the NPPF

#### NPPF.

*104. Existing open space, sports and recreational buildings and land, including playing fields and formal play spaces, should not be built on unless:*

*(a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or*

*(b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or*

*(c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.*

Therefore, the playing field is covered by the terms of NPPF paragraph 104 (b) and (c).

It is noted that there may be unintended consequences should the school wish to extend with additional buildings on the site. The merits of this argument were debated at the meeting of Stonesfield Parish Council on 3 September 2025, and it was noted that where such development was in the public interest it would likely gain permission, albeit a risk to the County Council. However, it was agreed that this risk needed to be balanced against the high level of public support for designation, which is clear from the Village Survey. The Playing Field ranked second highest of all sites proposed with over 90% support for it to become a LGS.

Given the major significance of the high level of public support for designation, whilst the proposal to meet the Parish Council's “NP representatives on Teams to seek a way forward” is gratefully noted, it is not felt that any such meeting would contribute usefully to the decision-making process.

## **Conclusion**

Taking all these matters into account and having considered the issue carefully, the Parish Council does not consider there are valid reasons for withdrawing its proposal within the draft Neighbourhood Plan for the designation of the Playing Field as a Local Green Space.

## Neighbourhood Development Plan

From: [REDACTED]

Sent: Tue, 21 Jan, 2025 at 18:27

To: Parish Clerk

---

Dear [REDACTED]

I'm responding for the trustees of Stonesfield Playing Field Association regarding the proposal to designate the playing field as a Local Green Space ([REDACTED] letter of 6th December).

Having discussed the proposal the trustees would not support it.

We are a registered charity and should there be any prospect of the land being disposed of by the charity in the future it could only be in the context of using the proceeds to immediately acquire a comparable or better facility in the immediate area to be consistent with, and continue to meet, our charitable objectives.

The land is also located within the Cotswolds AONB which puts further restrictions on future development.

It feels to us therefore that designation as a Local Green Space gives little additional protection for the site but potentially adds a further unnecessary burden of legislative compliance for the charity.

Regards

[REDACTED]

# Stonesfield Parish Council

Stonesfield Village Hall, Field Close, Stonesfield, OX29 8HA

Email: clerk@stonesfieldpc.uk



1 October 2025

Dear 

**Stonesfield Neighbourhood Plan – possible designation of land owned by Stonesfield Playing Field Association CIO as a Local Green Space: Stonesfield Village Playing Field.**

Thank you for the written representations of  on behalf of the Playing Field Association, received on 21 January 2025, in response to my letter of 6 December 2024. I am sorry for the delay in replying to those. That has been occasioned largely because of the very considerable work it has been necessary to do in giving careful consideration to the several representations made by owners of all the parcels of land proposed for designation, deciding what action should be taken in the light of those representations and drafting responses. That work is time-consuming and we are reliant upon the goodwill and unpaid work of volunteers to assist us in preparation for deliberations by parish councillors.

I attach/enclose a note of the Parish Council's consideration of your submissions, of its determinations and the reasons for those determinations.

Yours sincerely,



*Chair of Stonesfield Parish Council.*

## Parish Council response

4 September 2025

### Consideration of representations resisting designations as Local Green Spaces (LGS).

The Village Playing Field representations dated 21 January by the Trustees of Stonesfield Playing Fields Association.

The Stonesfield Parish Council ("SPC") has carefully considered the Trustees' Representations and its consideration and conclusions are summarised as follows.

It is accepted that Playing Fields already have a degree of protection under the NPPF

#### NPPF.

*104. Existing open space, sports and recreational buildings and land, including playing fields and formal play spaces, should not be built on unless:*

*(a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or*

*(b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or*

*(c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.*

Therefore, the playing field is covered by the terms of NPPF paragraph 104 (b) and (c).

It is noted that (1) the only circumstance the Trustees would consider disposal of the land is in the event of provision of a comparable or better facility in the immediate area (2) some restriction upon development already applies by virtue of the land's situation in the Cotswolds AONB. The merits of these arguments were debated at the meeting of Stonesfield Parish Council on 3 September 2025. However, it was agreed that this needed to be balanced against the high level of public support for designation, which is clear from the Village Survey. The Playing Field ranked highest of all sites proposed with over 90% support for it to be a LGS.

## Conclusion

Taking all these matters into account and having considered the issue carefully, the Parish Council does not consider there are valid reasons for withdrawing its proposal within the draft Neighbourhood Plan for the designation of the Playing Field as a Local Green Space.

██████████  
Chair, Stonesfield Parish Council  
Village Hall  
Field Close  
Stonesfield  
OX29 8HA

DD: 07761 666182  
E: atwamley@arc-planning.co.uk  
Date: 30<sup>th</sup> January 2025

Dear ██████████

**STONESFIELD NEIGHBOURHOOD DEVELOPMENT PLAN - POSSIBLE DESIGNATION OF LAND TO THE NORTH OF WOODSTOCK ROAD, STONESFIELD FOR A LOCAL GREEN SPACE**

Arc Planning Associates ('Arc') write on behalf of Rectory Homes and ██████████ to **OBJECT** to Stonesfield Parish Council's ('SPC') proposal to allocate the above site for a Local Green Space ('LGS') as part of the Stonesfield Neighbourhood Plan ('SNP'). This proposal is set out in your letter dated 6<sup>th</sup> December 2024.

We note this is one of several LGS's that are being considered by SPC following the preparation of an independent Local Landscape Assessment ('LLA').

**About Rectory Homes**

As a privately owned and managed niche developer, Rectory excels at creating high quality developments in desirable locations. It is committed to providing development that brings about positive environmental, social and economic benefits to local communities. Rectory has a proven track record of working with communities, partners, and people, all in the pursuit of delivering positive change and sustainable value. Further details can be found at <https://www.rectory.co.uk/>

## **Background**

Rectory Homes has a development option over [REDACTED] land and therefore has a vested interest in any future allocation. Working alongside the landowner and key stakeholders, Rectory Homes is seeking to secure the site's allocation for housing within the emerging Local Plan 2041, as well as within the emerging SNP.

Owing to the five-year housing land supply ('5YHLS') shortfall in West Oxfordshire District Council's ('WODC') area, which at the time of writing stands at 4.3 years (see appeal decision at Hailey Road, Witney; appeal reference: APP/D3125/W/23/3328652) Rectory Homes is also considering an early planning application.

Rectory consider the site offers a sustainable location for new development which can help meet the housing needs of the village and the district taken as a whole. The provision of affordable housing will also address the issue of affordability within the village, as well as the need to provide starter homes and homes for the elderly.

Besides the proposed houses and highways access, the development could provide a pre-school, junior and senior football pitch, parking, public open space, and play areas. We also consider the site offers space to significantly improve the sites and wider area's biodiversity.

These community benefits are based on the findings of a residents' questionnaire which was commissioned by SPC to inform the emerging neighbourhood plan.

We consider this proposal would also meet the key aims of the National Planning Policy Framework ('NPPF') which was updated in December 2024, as well as the Government's broader aims to boost housing delivery within this current parliament.

In parallel to the revised NPPF, the Government has also published a revised housing methodology for calculating housing need which is now based on affordability as opposed to population projections. As a consequence, WODC are now required to provide 13% more housing than the current Local Plan 2031 requirement, an overall increase from 798 to 905 dwellings per annum.

## **Stonesfield Neighbourhood Plan ('SNP')**

Preparation of the SNP follows formal designation of the neighbour plan area on 17<sup>th</sup> November 2021, and we note various workstreams have been undertaken including the aforementioned LLA, a Housing Needs Assessment and a Residents' Survey.

## **The Site**

The site extends to approximately 6.2 ha and lies to the eastern boundary of the village between the recreational sports pitches to the north and Woodstock Road to the south.

It is used for agricultural purposes and has a related access in its southern corner. It gently slopes down from the north towards the south and its boundaries consist of native hedges and trees.

Other than being located within the Cotswolds National Landscape there are very few planning constraints. It is noted in the south-eastern corner there is a risk of surface water flooding. The conservation area and various listed buildings are located some distance from the site.

## **Planning Context**

We are of course aware of the significant planning history, and the Cala Homes refusal on appeal in 2019. However, it should be emphasised that the site was assessed positively in WODC's 2016 Strategic Housing Land Availability Assessment ('SHELAA') which acknowledged its potential for around 50 dwellings with provision of significant open space. It was also considered suitable for small-scale employment use potentially as part of a mixed-use development.

The site was also put forward briefly by WODC as a potential housing allocation to the second and third sittings of the Local Plan 2031 Examination in Public (although this was later discounted because – at that time – it was not required to meet an identified housing need).

The Cala Homes appeal decision (ref: APP/D3125/W/18/320955) related to 68 dwellings on a much smaller site - 3.40 ha as opposed to 6.2 ha today. There were two reasons for refusal originally, focused on:

- the impact on the local landscape, density and inadequate provision for landscaping and planting, and;
- the lack of a legal agreement to mitigate (amongst other things) the impact on community infrastructure and the need to provide affordable housing.

In his decision letter, the appeal Inspector concluded that the proposals would cause significant harm to the character and appearance of the AONB (now National Landscape) and would be contrary to the NPPF, as well as the West Oxfordshire Local Plan ('WOLP'). The Inspector stated the appellants did not provide convincing evidence of a specific local housing need specific to the settlement, so consequently did not consider that the exceptional circumstances test had been met. Additionally, the Inspector afforded moderate to significant weight to the additional benefits provided by the scheme

In finding harm to the character and appearance of the AONB (National Landscape), and the in absence

of any convincing exceptional circumstances case being made, the Inspector considered these did not outweigh the highest level of protection that the NPPF provides to conserving the landscape of the AONB (National Landscape). Consequently, it was concluded the location of the proposed development would be contrary to the provisions of the development plan; and moreover, the public interest test as identified in NPPF was also not met.

In light of the site's planning history, Rectory is committed to a working dialogue with SNP, over a sustained period, to agree how these issues may now be overcome. We are 100% committed to deliver a benchmark scheme that is both sustainable and offers high quality development, minimises impact to the National Landscape, and delivers development that the community would be proud of.

Given WODC's 5YHLS shortfall, and the Government's commitment to boost housing land supply, we consider there is some inevitability that the site will now come forward for development. Rectory therefore want to engage with SPC and local stakeholders as early and collaboratively as possible to share their ideas for the site.

#### **Local Green Space ('LGS') – Our Objection**

The concept of Local Green Space ('LGS') is discussed at NPPF paragraphs 106-108 (this is summarised below). A definition of LGS can however be found within the Planning Practice Guidance ('PPG') under the heading 'Open Space, Sports and Recreation Facilities, Public Rights of Way and Local Green Space'.

In respect to the LGS definition the PPG states:

*"Local Green Space designation is a way to provide special protection against development for green areas of particular importance to local communities."*<sup>1</sup>

NPPF paragraph 106 states:

*"The designation of land as Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them. Designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or updated and be capable of enduring beyond the end of the plan period."*

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<sup>1</sup> [Open space, sports and recreation facilities, public rights of way and local green space - GOV.UK](https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space)

NPPF paragraph 107 states:

*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.*

NPPF Paragraph 108 states:

*Policies and decisions for managing development within a Local Green Space should be consistent with national policy for Green Belts set out in chapter 13 of this Framework.*

Whilst we support neighbourhood planning, as well as the SPC's proposals for the SNP Rectory wish to **object** to the site's allocation, in its entirety, for Local Green Space ('LGS'). To designate the whole site as LGS would effectively sterilise the site for development and will only serve to put pressure on other sites within village to provide new housing.

If several LGSs are introduced in the village, they would serve to limit its long-term vitality and viability, including the ability to address housing affordability (particularly for young families, the lifeblood of any small community) as well as providing suitable accommodation for the elderly wishing to downsize but remain within the village. Effectively therefore, a LGS designation here or elsewhere could have a potentially a very significant negative impact on the village.

Furthermore, we believe the National Landscape designation should not be used as barrier to sustainable development; development that is landscape led can be successfully introduced into sensitive surroundings if it is carefully planned. Part of the site could be delivered as LGS, but only as part of a comprehensive development.

Rectory intend that their development proposal comes forward as an allocation within the emerging Local Plan 2041 and the SNP. However, where there is an immediate need to provide housing they may wish to bring forward an early planning application.

Given your letter is dated 6<sup>th</sup> December 2024 and covered the Christmas holidays we would also request further time to fully review your evidence base to justify the LGS allocation; this includes the appointment of a suitably qualified landscape consultant that can verify the findings of the LLA on Rectory's behalf and then discuss the findings with you and your consultant.

We note appendix C of your letter sets out the evidence for designating the LGS on site and this is summarised as follows:

In respect to 'local in character' (item 3) your letter states the following:

*[The site] forms part of the landscape setting on the most heavily trafficked approach to the village i.e. the Woodstock Road, described by the Landscape Assessment (page 18 final para) as “fundamental” i.e. “the landscape setting is fundamental in inward views of the village, and this gives Stonesfield its rural settlement character”.*

In respect to ‘reasonably close proximity to the community it serves’ (item 4) your letter states :

- *The site is contiguous with the built environment*
- *There are no public rights of way over the site, however there are views over the site from the directly adjacent Woodstock Road towards the playing field, and from the playing field over open landscape*

In respect to ‘demonstrably special to the local community’ (item 5) your letter states:

- *Immediately adjoins the village playing fields and by being preserved as open space enhances the beauty, tranquillity and recreational value of the playing field;*
- *Contributes substantially to the “lack of visible development” which the Landscape Assessment says “reinforces rural character on approaching the village from the north-east and adds to the significance of this LLCA as per of a rural ‘buffer’ between Stonefield and World Heritage Site at Blenheim Place” (page 54, para 6);*
- *Contributes substantially to what the Landscape Assessment (page 54, final para) observes to be, for those using the “important recreation route” which is the footpath using the line of the former Roman Road, Akeman Street, “clear views towards Stonesfield across the open farmland” putting the Stonesfield Inner Fields firmly in the settlement’s rural landscape setting;*
- *Is within and is essential to the openness of that setting, which the Landscape Assessment (page 54 final para, page 55 first para) judges to be at risk because “Recent housing development at Charity Farm (William Buckland Way) has created a hard edge to the village in these views, and additional development will further threaten the integrity of its valued rural character”;*
- *Encompasses the site, development of which was rejected so robustly in his Cala Homes planning appeal decision by the planning inspector Stephen Normington, in June 2019 (paragraph 52 Appeal Decision dated 21 June 2019 APP/D3125/W/18/3209551) when he agreed with the current Landscape Assessment stating:-*
  - *From the Akeman Street footpath “current views looking towards the village on this approach are dominated but the incongruity of the Charity Farm development which owing*

*to its urban form and materials, appears as a disjointed protrusion into the rural landscape and displays little integration with the rest of the village” and*

- *“The proposed development would add to this incongruity. The cumulative visual impact of the existing and proposed development when viewed from Oxfordshire Way would fundamentally and unacceptably change the characteristic open character of the dip slope lowland. This change would be visible and perceptibly experienced at close quarters by users of the public right of way on the approach to the village such that in views looking north-west the village would appear as more or a modern ‘suburbanisation’ of a rural settlement within the AONB. This change would adversely affect the enjoyment of the users of the path” and speaking of the Woodstock Road approach to the village, “The appearance and rural character of this part of the AONB would be unacceptably changed and a more suburban character would prevail. This would unacceptably harm the rural setting of Stonesfield within the context of the settled landscape articulated in the various character assessments.”*
  
- *Achieved 78.2% support for designation in the Village Survey*

At this stage, we neither support nor object to the above statements but Rectory request further time to consider their response, in conjunction with their appointed landscape consultant.

Our interim position however is that we consider part of the site could be delivered as LGS but only if it is delivered as part of a comprehensive development scheme.

### **Our Development Strategy**

We recognise national and local policies seek to protect designated areas such as the National Landscape and there is a presumption against approval of major developments in the National Landscape unless there are exceptional circumstances and where the development is in the public interest. We note these points have been reinforced in both the planning decision and the dismissed appeal, so it is vital we consider the issues raised in respect of previous proposals at an early stage and incorporate the landscape led design approach from the outset.

Whilst the development of the site may represent ‘major development’ within the National Landscape, we do consider the proposals would address unmet housing need. In addition, the potential delivery of community benefits at the site (e.g. a pre-school, junior and senior football pitch, parking, public open space, and play areas) would be very much in the public interest.

As stated, our development proposals will be landscape led and will be drawn up in full consultation with the Cotswolds National Landscape Board (referencing their Management Plan and guidance notes) as well as WODC and SPC.

We will also ensure the appointed architect and landscape consultant work collaboratively in order to provide a high quality and comprehensive development scheme. A Landscape Visual Impact Assessment ('LVIA') would also be prepared.

To build an exemplar scheme we also consider it important to incorporate the following additional benefits, including:

- Enhanced standards in respect terms of building fabric / sustainable construction;
- Provide a voluntary minimum biodiversity net gain materially exceeding 10%;
- Explore the provision of accommodation for elderly people, including bungalows; and
- Ensure there is sufficient capacity within the local sewer network to minimise pollution within the district's rivers, streams and watercourses,

In our experience, we do not consider it appropriate to overprovide affordable housing because of local concern that it could upset the balance within rural communities. According to the adopted Local Plan, Stonesfield is located within a high value zone where 50% affordable housing is therefore required.

We will endeavour to undertake public consultation in advance of submission of any planning application and to work with all key stakeholders. Given the site's planning history, we are fully aware SPC and residents will be wary of another scheme and are likely to be hostile to development of this site.

### **Conclusions & Next Steps**

Rectory homes and [REDACTED] objects to the allocation of the site, in its entirety, for LGS. We consider part of the site could be delivered as LGS but only if it is delivered as part of a comprehensive development scheme which is landscape design led and has been fully discussed with all key stakeholders and residents, including SPC and WODC.

In summary, we genuinely want to work with SPC on a collaborative basis, ensuring the site can be developed to the best it can be within this National Landscape setting, and that we can deliver something the community can be proud of.

We would welcome a meeting with you at the earliest opportunity to discuss our ideas for the site and our response to the work of the independent LLA.

If you have any further questions in the meantime though, please do not hesitate to get in contact.

Yours sincerely,

ATWAMLEY

**Arron Twamley MRTPI**  
**Director**  
**Arc Planning Associates**

Cc Edd Vickers, Rectory Homes  
Mr Michael Charles Robinson

# **Stonesfield Parish Council**

Stonesfield Village Hall, Field Close, Stonesfield, OX29 8HA

Email: [clerk@stonesfieldpc.uk](mailto:clerk@stonesfieldpc.uk)

Mr Arron Twamley MRTPI,  
Arc Planning Associates Ltd.,  
Sandford Gate,  
Oxford, OX4 6LB

Email: [atwamley@arc-planning.co.uk](mailto:atwamley@arc-planning.co.uk)

1 October 2025

Dear Mr Twamley,

## **Stonesfield Neighbourhood Plan – possible designation of land north of Woodstock Road, Stonesfield as a Local Green Space.**

Thank you for your written representations of 30 January 2025 on behalf of Rectory Homes and [REDACTED] in response to my letter of 6 December 2024. I am sorry for the delay in replying to those. That has been occasioned largely because of the very considerable work it has been necessary to do in giving careful consideration to the several representations made by owners of all the parcels of land proposed for designation, deciding what action should be taken in the light of those representations and drafting responses. That work is time-consuming and we are reliant upon the goodwill and unpaid work of volunteers to assist us in preparation for deliberations by parish councillors.

I attach/enclose a note of the Parish Council's consideration of your submissions, of its determination and the reasons for that determination.

Yours sincerely,

[REDACTED],  
*Chair of Stonesfield Parish Council.*

## Parish Council response

22 March 2025.

### **Consideration of representations resisting designations as Local Green Spaces.**

Land north of Woodstock Road, Stonesfield ("the Woodstock Road land") – Representations dated 30 January 2025 by Arc Planning Associates on Behalf of Rectory Homes and [REDACTED] [REDACTED] ("the Arc Representations").

The Stonesfield Parish Council ("SPC") has carefully considered the Arc Representations and its consideration and conclusions are summarised as follows.

The designation of this land and indeed other land by the draft Neighbourhood Plan as a Local Green Space is based on perceived satisfaction of the three conditions required by paragraph 107 of the National Planning Policy Framework ("NPPF") to be fulfilled before land is designated. The Parish Council does not understand the Arc Representations to bring into issue satisfaction of two of the conditions i.e. "close proximity to the community" and "local in character and ... not an extensive tract of land." The Representations do bring into issue the third and arguably the most significant of the three conditions i.e. "demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value..., tranquillity or richness of its wildlife."

Appendix C of the draft Neighbourhood Plan sets out in detail why SPC considers this condition to be fulfilled. This explanation refers, inter alia, to: –

1. enhancement of the beauty, tranquillity and recreational value of the adjacent playing field;
2. reinforcement of the rural character on approaching the village;
3. a substantial contribution by the land to what the Neighbourhood Plan Local Landscape Assessment observes to be, for those using the important nearby Akeman Street footpath, "clear views towards Stonesfield across the open farmland;
4. the need, as expressed in the 2019 Cala Homes planning appeal decision relating to a major development proposal for this land (APP/D3125/W/18/3209551 – "the Cala Appeal"), to avoid adding to "the incongruity of the recent Charity Farm development which, owing to its urban form and materials, appears as a disjointed protrusion into the rural landscape and displays little integration with the rest of the village;"
5. the view of the planning inspector in the Cala Appeal that the development then proposed for part of this land would "fundamentally and unacceptably change the characteristic open character of the dip slope lowland" and would appear to users of the public right of way (the Akeman Street footpath) on approach to the village "such that in views looking north-west the village would appear as more of a modern "suburbanisation" of a rural settlement within the AONB;"
6. the unacceptable, in the opinion of the Cala planning inspector, change in the appearance and rural character of this part of the AONB which development of the site alongside the Woodstock Road approach to the village would cause, with the effect that "a more suburban character would prevail" which "would unacceptably harm the rural setting of Stonesfield;"
7. last, but not least, 78.2% support for the designation in the Neighbourhood Plan Village Survey.

These are largely objective considerations which relate clearly and unequivocally to the consequences development of the site would have upon the needs of the present generation of inhabitants of Stonesfield and of those who frequent the Area of Outstanding Natural Beauty in which Stonesfield is

situated and upon the needs of future generations of inhabitants of Stonesfield and visitors to the AONB.

The Arc Representations have no basis in the needs of the present generation or future generations of inhabitants and visitors to the AONB. The author of the representations deserves credit for unashamedly acknowledging that Rectory Homes is “a privately owned and managed niche developer” which “has a development option over [REDACTED] land and therefore has a vested interest in any future allocation.” Rectory Homes also admits it is “seeking to secure the allocation of the land for housing within the emerging Local Plan 2041 as well as within the emerging SNP.” The principal motivation of Rectory, however it may be greenwashed, is, legitimately as it is in business to make money, profit maximisation rather than meeting the needs of present and future generations of Stonesfield residents and visitors to the AONB. The Representations have to be considered against an acknowledgement of this. Indeed, the motivation of Rectory Homes is implicit within the use of language in the Representations. The land is referred to as “the site,” i.e. it is given little or no significance outside its potential to be a development site.

The Representations claim that “the site offers space to significantly improve the sites (*sic*) and wider area’s biodiversity.” Such assurances are familiar to SPC and the residents of Stonesfield, who so resolutely opposed the 2017 proposal for development made by Cala Homes. One of the purported justifications for the Cala proposal, so roundly rejected by the planning inspector, was a “Green Infrastructure Strategy” including “a Gateway Green” vaunted as a “significant area of green space... at the entrance to the settlement” which would “create an attractive arrival point with feature trees and shrub planting which would be indigenous” and a “substantial swathe of landscape... located on the eastern side of the proposed neighbourhood... the Eastern Parkland... strongly defined by parkland trees set within a grassland area including meadows.” Cala claimed “the green infrastructure landscape design will result in a net beneficial effect in terms of the local landscape character when compared to what currently exists.” The Inspector gave this short shrift. Cala, having considered SPC’s response to its “Statement of Facts and Grounds” in the High Court proceedings by way of statutory review which followed, withdrew its Application.

The Arc Representations state “Rectory consider the site offers a sustainable location for new development.” There is no explanation of what Rectory means by “sustainable” in this context. Planning policy, e.g. the National Planning Policy Framework (the NPPF) and West Oxfordshire Local Plan (WOLP), requires development where possible to be “sustainable” and indeed, *ceteris paribus*, includes a presumption in favour of sustainable development. It is arguably an abuse of language to speak of a “sustainable location.” The meaning of “sustainable” in a planning context has been a matter of considerable debate. It has achieved the status of motherhood and apple pie whilst rarely if ever being concisely defined. Central government’s Sustainable Development Management Plan 2020/25 produced by Public Health England in August 2020 explains its understanding of the priorities entailed by sustainability, including:

1. sustainable consumption and production;
2. climate change and energy;
3. natural resource protection and environmental enhancement;
4. sustainable communities.

The Management Plan acknowledges as one of the most used definitions of “sustainable development” that given at the Rio “Earth Summit” in 1992 by the Chairperson Gro Harlem Brundtland, i.e. “Development that meets the need of the present generation without compromising the needs of future generations to meet their own needs.” This objective is acknowledged in paragraph 7 of the NPPF. The NPPF, at paragraph 8, stipulates three overarching objectives for

achieving sustainable development i.e. an economic objective, a social objective and an environmental objective. Any development proposals for the Woodstock Road field would have to be judged against these considerations. The Cala planning inspector so assessed the Woodstock Road field and determined that the proposals then made were unacceptable. Taking into account the reasons he gave for his decision to reject the Cala Appeal, it is impossible to envisage a realistic proposal for major development on the land being in accordance with relevant planning policy.

Stonesfield is in the Cotswolds Area of Outstanding Natural Beauty. It is adjacent to the World Heritage Site of Blenheim Palace and Park. It is the gateway to the AONB on the approach from Blenheim. The Woodstock Road land is alongside the main highway approach to the village. The significance of this is recognised in both the Parish Council's Local Landscape Assessment and in the Cala planning inspector's decision. Paragraph 187 of the NPPF requires planning policies and decisions to contribute to and enhance the natural and local environment, inter alia, by protecting and enhancing valued landscapes, and paragraph 189 stipulates that "Great weight should be given to conserving and enhancing landscape and scenic beauty in National Landscapes" i.e. Areas of Outstanding Natural Beauty. Paragraph 190 of the NPPF requires the refusal, in the AONB, of planning permission for major development (defined in the NPPF glossary as "For housing, development where 10 or more homes will be provided, or the site has an area of 0.5 ha or more"), other than in exceptional circumstances and where it can be demonstrated that the development is in the public interest. Any development of the Woodstock Road land, 6.2 ha in extent, likely to be proposed would be a "major development." Indeed the Arc Representations seem to accept this, referring to the "presumption against approval of major developments ... unless there are exceptional circumstances and where the development is in the public interest" and asserting "the proposals would address unmet housing need" and "the potential delivery of community benefits of the site (e.g. a pre-school, junior and senior football pitch, parking, public open space and play areas) would be very much in the public interest"

It is, however, difficult, if not impossible, to envisage proposals which might constitute the required "exceptional circumstances" and "public interest" which would make major development of the land acceptable. Any suggestion that "unmet housing need" would constitute either exceptional circumstances or a public interest justifying major development is ill-founded. The very thorough Housing Needs Assessment carried out in the course of preparation of the draft Stonesfield Neighbourhood Plan concluded at pages 36 and 37: –

1. It is projected that the housing market will satisfy local need for anyone in the settlement seeking to move in the next five years, with significant excess capacity to cater for anyone who might wish to move but didn't identify as knowing their future intentions at the date of the survey. There is no requirement for additional market housing and no requirement for a major development.
2. There may be a very small shortfall of social/affordable housing in the next five years.
3. There may be a case to deliver more social/affordable homes for people with a local (Stonesfield) connection which could be met via a small rural exception site.

The Arc Representations refer to the Government's publication of "a revised housing methodology for calculating housing need" and assert that "WODC are now required to provide 13% more housing than the current Local Plan 2031 requirement." It is most unlikely that any increase in provision for housing required of WODC will affect this conclusion of the Neighbourhood Plan Housing Assessment. The most recent WODC Local Plan 2041 Consultation Summary Report, i.e. that of February 2024, says at 3.114 "Comments expressed concerns regarding the (*sic*) development within designated landscapes such as the Cotswolds National Landscape, Green Belt and other protected areas. The consensus is that any development in these sensitive areas should be exceptional and meet specifically identified local needs." The Council itself had said in the process of Consultation (recorded at 3.108): "National policy and initial feedback on the local plan so far emphasise the need for the intrinsic character and

beauty of the countryside to be recognised, protected and wherever possible enhanced. This is a particularly important issue for West Oxfordshire which has distinctive and varied countryside, contributing to the District's character including the Cotswolds National Landscape." Therefore, any increase in housing provision by way of major development within West Oxfordshire District is likely to be met in settlements outside the AONB. Need for housing in Stonesfield is likely to continue to be construed as a specifically identified local need. Planning Inspector Stephen Normington at paragraph 60 of his Cala Appeal Decision took the view that "local housing need means need of a specific settlement."

Equally ill-founded is any suggestion that "potential delivery of community benefits" might constitute a "public interest" justifying a major development. Stonesfield is already provided with a pre-school on the site of and adjoining the primary school, i.e. in the best place to facilitate transition from pre-school to primary school, and there is no evidence or indeed anxiety that capacity is inadequate. Football and cricket pitches are already generously provided at the existing village playing field, which also accommodates a first-rate set of tennis courts and where there are also already parking spaces and a well patronised play area.

## **Conclusion**

Taking all these matters into account and having considered the issue carefully, the Parish Council does not consider there are valid reasons for withdrawing its proposal within the draft Neighbourhood Plan for the designation of the land north of Woodstock Road as a Local Green Space.



## BLenheim ESTATE

31<sup>st</sup> January 2025

[REDACTED]  
Stonesfield Parish Council  
Stonesfield Village Hall  
Field Close  
Stonesfield  
OX29 8HA

**Sent via E-mail only**

Dear [REDACTED]

### **Stonesfield Neighbourhood Development Plan - Local Green Space**

Thank you for your letters dated 6<sup>th</sup> December notifying the Blenheim Estate of the Parish Council's intentions with regards four proposed areas of Local Green Space in the Stonesfield Neighbourhood Plan. The areas include The Paddocks, Land south of William Buckland Way, The Dene at Laughton Hill and the Allotments. Please note that the land at the Paddocks is not owned by the Blenheim Estate.

We are supportive of neighbourhood planning and we are keen to see the making of a successful Stonesfield Neighbourhood Plan. We would like to take this opportunity to express our support for the proposed designation of the allotments and land at Laughton Hill as appropriate areas of Local Green Space that meet the relevant national policy tests.

In this regard and as you are no doubt aware, Paragraph 106 of the NPPF requires Local Green Space designations to be consistent with the local planning of sustainable development and complement the delivery of sufficient homes, jobs and other essential services. Whilst there is no requirement for neighbourhood plans to allocate land for development, it is a basic condition that neighbourhood plans must contribute to the achievement of sustainable development.

West Oxfordshire District Council is in the process of developing a new Local Plan. The Council does not have a 5 Year Housing Land Supply and further to changes in national policy regarding housing requirements, it must provide for significantly more housing land than previously anticipated. Settlements across the District, including those within the Cotswolds National Landscape, will need to contribute to the delivery of the affordable and market housing required in West Oxfordshire.

Various constraints to development mean that there are only limited opportunities to provide for sustainable growth in and around Stonesfield. One such opportunity potentially exists on land to the south of William Buckland Way, where there is clearly



## BLenheim ESTATE

scope for the sustainable development of a limited number of affordable and market dwellings that can appropriately contribute to the settlement's housing needs.

Given this, the proposed designation of a Local Green Space at [REDACTED] [REDACTED] proposed, does not appear to be consistent with the local planning of sustainable development. Further, it appears to seek to prevent, rather than to complement investment in sufficient homes.

Concerningly, as there is no suggestion that the Neighbourhood Plan will be seeking to allocate land and thus identify alternative locations for the delivery of much-needed affordable and market housing, the proposed designation of Local Green Space at William Buckland Way appears to run the significant risk of preventing the neighbourhood plan from contributing to the achievement of sustainable development.

As an order to be made (or adopted), neighbourhood plans must meet all of the basic conditions. In the interest of its successful progress, we would therefore recommend that the Parish Council re-thinks its approach in respect of seeking to designate land to the south of William Buckland Way as Local Green Space.

In this regard, as well as focusing Local Green Space designations on sites that pass the national policy tests, there is also the opportunity for the Neighbourhood Plan to consider the inclusion of policies that seek to control the type of sustainable development that the settlement requires. The Neighbourhood Plan need not include development land allocations to achieve this but could introduce policies covering a wide range of matters, including design, infrastructure, local amenities and so on. In this way, the Neighbourhood Plan can look to plan for and control sustainable development over the plan period.

I hope the above is helpful, and we look forward to engaging with the Stonesfield Parish Council.

Yours sincerely

**Ashley Maltman MRTPI**  
**Head of Planning**

# Stonesfield Parish Council

Stonesfield Village Hall, Field Close, Stonesfield, OX29 8HA

Email: [clerk@stonesfieldpc.uk](mailto:clerk@stonesfieldpc.uk)

Mr Ashley Maltman, MRTPI,  
Head of Planning,  
Blenheim Estate,  
Woodstock,  
Oxfordshire OX28 1PP.

Email: [estate@blenheimpalace.com](mailto:estate@blenheimpalace.com)

1 October 2025

Dear Mr Maltman,

**Stonesfield Neighbourhood Plan – possible designation of land owned by Blenheim Estate as a Local Green Space: (1) Paddocks south of Witney Lane, (2) Land south-east of William Buckland Way (3) The Dene (4) Woodstock Road allotments.**

Thank you for your written representations of 31 January 2025 on behalf of the Blenheim Estate in response to my letter of 6 December 2024. I am sorry for the delay in replying to those. That has been occasioned largely because of the very considerable work it has been necessary to do in giving careful consideration to the several representations made by owners of all the parcels of land proposed for designation, deciding what action should be taken in the light of those representations and drafting responses. That work is time-consuming and we are reliant upon the goodwill and unpaid work of volunteers to assist us in preparation for deliberations by parish councillors.

We note your indication you are not the landowner of the fields south of Witney Lane. We have now communicated with those who have informed us they are the owners.

We are pleased that you support the designation of the The Dene and the Woodstock Road allotments. Thank you for your support.

I attach/enclose a note of the Parish Council's consideration of your submissions about the land south-east of William Buckland Way, of its determinations and the reasons for those determinations.

Yours sincerely,



*Chair of Stonesfield Parish Council.*

## Parish Council response

22 March 2025.

### **Consideration of representations resisting designations as Local Green Spaces.**

The field south-east of William Buckland Way (“the WBW Land”) – Representations dated 31 January 2025 by Blenheim Estate (“the Blenheim WBW Representations”).

The Stonesfield Parish Council (“SPC”) has carefully considered the Blenheim WBW Representations and its consideration and conclusions are summarised as follows.

The designation of this land and indeed other land by the draft Neighbourhood Plan as a Local Green Space is based on perceived satisfaction of the three conditions required by paragraph 107 of the National Planning Policy Framework (“NPPF”) to be fulfilled before land is designated, i.e. land designated must be: –

- a. in reasonably close proximity to the community it serves;
- b. demonstrably special to the local community and hold 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 not an extensive tract of land.

The Parish Council does not understand the Blenheim WBW Representations to bring into issue satisfaction of any of the three conditions, i.e. “close proximity to the community” and “local in character and ... not an extensive tract of land.” The Representations focus rather upon: –

- i. the potential contribution of development on the WBW Land to the 5 Year Housing Land Supply within West Oxfordshire and
- ii. “scope for the sustainable development of a limited number of affordable and market dwellings that can appropriately contribute to the settlement’s housing needs.”

Appendix C of the draft Neighbourhood Plan sets out in detail why SPC considers the three conditions required by paragraph 107 of the NPPF are fulfilled and therefore the justification will not be repeated here, except insofar as it relates to the Housing Land Supply and sustainable development contentions of the Blenheim WBW Representations.

### **Housing Land Supply.**

Blenheim asserts that

- A. West Oxfordshire District Council “does not have a 5 Year Housing Land Supply and further to changes in national policy regarding housing requirements, it must provide for significantly more housing land than previously anticipated;”
- B. “Settlements across the District, including those within the Cotswolds National Landscape, will need to contribute to the delivery of the affordable and market housing required in West Oxfordshire.”

Stonesfield is in what is, by statutory designation, the Cotswolds Area of Outstanding Natural Beauty (“AONB”). The Blenheim WBW Representations refer to this as the Cotswolds National Landscape. This response will use the statutory designation of AONB, as legal and policy requirements flow from

that. The AONB is adjacent to the World Heritage Site of Blenheim Palace and Park. The WBW land is alongside the highway approach to the village from the East, which is one of two entrances to the AONB from the direction of Blenheim (the other being the Woodstock Road). It is also adjacent to the Oxfordshire Way/Akeman Street much walked and cycled footpath/bridleway which runs through the AONB. The WBW Land is near to both the vehicular and footpath routes and is cherished by both residents of Stonesfield and the wider public for its beauty, historic significance, recreational value, tranquillity and richness of wildlife. The significance of this is recognised in both the Parish Council's Local Landscape Assessment and in the decision of Stephen Normington, the Planning Inspector in the planning appeal by Cala Homes in 2019 (Appeal Decision dated 21 June 2019 APAP/D 3125/W/18/3209551), relating to the nearby Woodstock Road land.

The author of the Landscape Assessment, having noted the "strong rural character" of the landscape on this side of Stonesfield, i.e. "the Stonesfield Inner Fields," points out at page 49 para 6 that it "forms part of the rural landscape setting when approaching Stonesfield from two of the four roads that converge in the village," one of which is the Combe Road which borders the WBW Land. At page 48 para 3 of the Landscape Assessment the author, referring to what is now known as the William Buckland Way development, said the "Recent housing development at Charity Farm has created a hard edge to the village in these views, and additional development will further threaten the integrity of its valued rural character." The views with which the author was concerned were those of the village from the Oxfordshire Way/Akeman Street, which passes the village in the dip slope valley adjacent to this side of Stonesfield. The Landscape Assessment recognises that this is part of the "rural landscape setting for the settlement" which "contributes to the special qualities of the Cotswolds Area of Outstanding Natural Beauty" and is one of the "Remaining pockets of pastoral land on the southern edge of the village" which "add to the settlement's sense of time depth and survive as remnants of historic field enclosures." (Page 50 Landscape Assessment).

Stephen Normington, the Planning Inspector in the Cala Planning Appeal Decision relating to the nearby Woodstock Road land, expressed similar serious concern about the harmful effect of development in these fields upon the AONB setting of the village. Agreeing with the Landscape Assessment, he said at paragraph 52 of the Appeal Decision that from the Akeman Street footpath "current views looking towards the village on this approach are dominated by the incongruity of the Charity Farm development, which, owing to its urban form and materials, appears as a disjointed protrusion into the rural landscape and displays little integration with the rest of the village." He was concerned that to users of Akeman Street, in views looking north-west from the Oxfordshire Way, should the Cala proposal have been accepted, "The cumulative visual impact of the existing and proposed development when viewed from Oxfordshire Way would fundamentally and unacceptably change the characteristic open character of the dip slope lowland" and the village would appear as more of a modern 'suburbanisation' of a rural settlement within the AONB." All this would apply a fortiori to development of the WBW Land, which is closer and more visible than the Woodstock Road land, to users of the Oxfordshire Way and to those approaching Stonesfield along the Combe Road.

Paragraph 187 of the NPPF requires planning policies and decisions to contribute to and enhance the natural and local environment, inter alia, by protecting and enhancing valued landscapes, and paragraph 189 stipulates that "Great weight should be given to conserving and enhancing landscape and scenic beauty in National Landscapes" i.e. Areas of Outstanding Natural Beauty. Paragraph 190 of the NPPF requires the refusal, in the AONB, of planning permission for major development (defined in the NPPF glossary as "For housing, development where 10 or more homes will be provided, or the site has an area of 0.5 ha or more"), other than in exceptional circumstances and where it can be demonstrated that the development is in the public interest. Any development of the WBW Land, 2.6 ha in extent, likely to be proposed would be a "major development." Indeed, for development of the WBW Land to make a significant contribution to the West Oxfordshire District Council 5 Year Housing

Land Supply it would require to be a “major development.” To be acceptable in the AONB therefore it would need to satisfy both the “exceptional circumstances” and “public interest” tests. After a public inquiry of five days, including voluminous oral and written witness evidence and submissions by Queen’s Counsel, Mr Normington determined that a proposal to which applied very similar considerations to those which would apply to any major development on the WBW Land did not satisfy the two tests. A major development on the WBW Land would not satisfy them either.

Any suggestion that “unmet housing need” would constitute either exceptional circumstances or a public interest justifying major development, which Planning Inspector Normington rejected in the Cala appeal, is also shown to be ill-founded by the very thorough Housing Needs Assessment carried out during preparation of the draft Stonesfield Neighbourhood Plan. This Assessment concluded at pages 36 and 37 that the housing market in the existing built housing stock of the village would satisfy any relevant need for market housing: –

1. It is projected that the housing market will satisfy local need for anyone in the settlement seeking to move in the next five years, with significant excess capacity to cater for anyone who might wish to move but didn’t identify as knowing their future intentions at the date of the survey. There is no requirement for additional market housing and no requirement for a major development.
2. There may be a very small shortfall of social/affordable housing in the next five years.
3. There may be a case to deliver more social/affordable homes for people with a local (Stonesfield) connection which could be met via a small rural exception site.

There is no evidence base to support assertion A above of Blenheim WBW Representations. The most recent WODC Local Plan 2041 Consultation Summary Report is that of February 2024. In it the District Council at 3.108 recorded what it had said in the process of Consultation: “National policy and initial feedback on the local plan so far emphasise the need for the intrinsic character and beauty of the countryside to be recognised, protected and wherever possible enhanced. This is a particularly important issue for West Oxfordshire which has distinctive and varied countryside, contributing to the District’s character including the Cotswolds National Landscape.” The Report says at 3.114 “Comments expressed concerns regarding the (*sic*) development within designated landscapes such as the Cotswolds National Landscape, Green Belt and other protected areas. The consensus is that any development in these sensitive areas should be exceptional and meet specifically identified local needs.”

Planning Inspector Stephen Normington at paragraph 60 of his Appeal Decision in the Cala case took the view that “local housing need means need of a specific settlement.” That need, in the specific settlement of Stonesfield, as the Neighbourhood Plan Housing Needs Assessment established, will in the foreseeable future be “a very small shortfall of small affordable housing” which may be met by a small rural exception site comprising social/affordable homes for people with a local connection.

Therefore, any increase in housing provision by way of major development within West Oxfordshire District is overwhelmingly likely to be met in settlements outside the AONB and Stonesfield will not, as the Blenheim WBW Representations claim, “need to contribute to the delivery of the affordable and market housing required in West Oxfordshire.”

**Sustainable development of a limited number of affordable and market dwellings that can appropriately contribute to the settlement’s housing needs.”**

It follows from the above that, in the foreseeable future, except as may be provided by small rural exception site, there will be no need for contribution to the settlement’s housing needs by “a limited number of affordable and market dwellings.” There remains however the question of what constitutes

“sustainable development” in this context. There is no explanation in the Blenheim WBW Representations of what Blenheim means by “sustainable” in this context. Planning policy, e.g. the National Planning Policy Framework (the NPPF) and West Oxfordshire Local Plan (WOLP), require development where possible to be “sustainable” and indeed, *ceteris paribus*, includes a presumption in favour of sustainable development. The meaning of “sustainable” in a planning context has been a matter of considerable debate. It has achieved the status of motherhood and apple pie whilst rarely, if ever, being concisely defined. Central government’s Sustainable Development Management Plan 2020/25 (“the Management Plan”) produced by Public Health England in August 2020 explains its understanding of the priorities entailed by sustainability, including:

1. sustainable consumption and production;
2. climate change and energy;
3. natural resource protection and environmental enhancement;
4. sustainable communities.

The Management Plan acknowledges as one of the most used definitions of “sustainable development” that given at the Rio “Earth Summit” in 1992 by the Chairperson Gro Harlem Brundtland, i.e. “Development that meets the need of the present generation without compromising the needs of future generations to meet their own needs.” This objective is acknowledged in paragraph 7 of the NPPF. The NPPF, at paragraph 8, stipulates three overarching objectives for achieving sustainable development i.e. an economic objective, a social objective and an environmental objective. Any development proposals for the WBW Land would have to be judged against these considerations. The Cala planning inspector so assessed the Woodstock Road field and determined that the proposals then made were unacceptable. Taking into account the reasons he gave for his decision to reject the Cala Appeal, it is impossible to envisage a realistic proposal for major development on the WBW Land being in accordance with relevant planning policy.

Equally importantly Blenheim, in the WBW Representations, makes no attempt to explain how what it calls “the sustainable development of a limited number of affordable and market dwellings” would contribute to the four priorities of the central government Management Plan, slightly differently expressed as the three overarching objectives of the NPPF in relation to sustainability. Going back to sustainability basics, the Blenheim WBW Representations simply do not address the need to explain why such market development, in the context analysed by the Neighbourhood Plan Housing Needs Assessment, would be consistent with the Brundtland notion of sustainability expressed at the Rio “Earth Summit” in 1992 i.e. “Development that meets the need of the present generation without compromising the needs of future generations to meet their own needs.” The Housing Needs Assessment makes it clear that the housing needs of the present generation do not require more market housing in Stonesfield. The Landscape Assessment and the contents of the Cala planning appeal decision of Planning Inspector Stephen Normington make it clear that needs of future generations, including the right to enjoy “the special qualities of the Cotswolds Area of Outstanding Natural Beauty,” would be prejudiced by more such development and would be at odds with the requirement of paragraph 189 of the NPPF that “Great weight should be given to conserving and enhancing landscape and scenic beauty in National Landscapes”

## **Conclusion**

Taking all these matters into account and having considered the issue carefully, the Parish Council does not consider there are valid reasons for withdrawing its proposal within the draft Neighbourhood Plan for the designation of the land north of Woodstock Road as a Local Green Space.

[REDACTED]  
Stonesfield Parish Council  
Stonesfield Village Hall  
Field Close  
Stonesfield  
OX29 8HA  
[clerk@stonesfieldpc.uk](mailto:clerk@stonesfieldpc.uk)

28.01.2025

Dear [REDACTED]

Many thanks for your letter dated 6 December 2024 outlining the proposals of the Stonesfield Neighbourhood Development Plan.

The land highlighted in the letter is owned by me, I purchased it and have preserved it as a natural site in keeping with the village landscape. I have lived at [REDACTED] for 20 years or more.

I object to the proposals to make my private land a Local Green Space.

In regard to paragraphs 102 - 107 of the NPPF, it does not meet the criteria for the following reasons:

1. The land is not accessible to the public and therefore does not hold particular local significance
2. The land is not a recreational space
3. The land does not have historic significance

I do not agree that because my land may be visible from The Oxfordshire Way that this makes it 'demonstratively special to a local community'.

I first bought the land to keep a horse, as my house is situated on a bridleway and I was a keen rider. I later used it to run a smallholding, rearing attractive rare-breed Jacob sheep for many years. My sheep also grazed and maintained many of the fields around the village. The field shelters were erected so that they could lamb safely. I no longer have sheep, but still enjoy keeping hens, so that I can supply eggs to the local community. There is a chicken house and fenced enclosure.

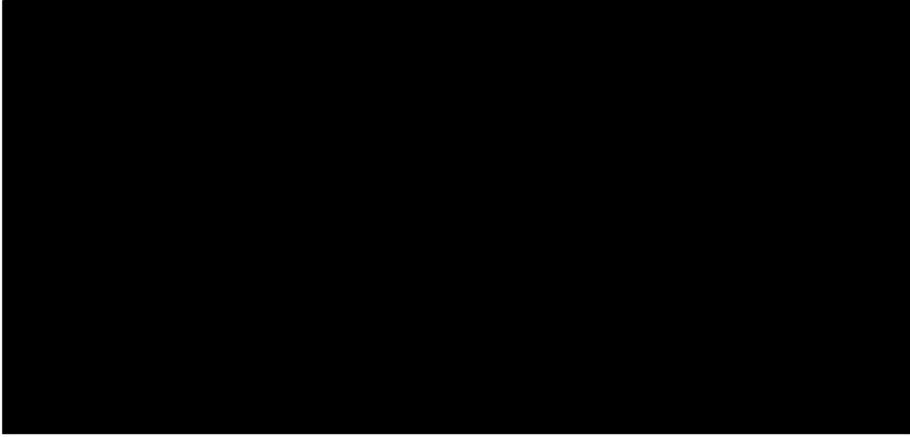
Within the fields I have cultivated an extensive orchard, as well investing my time and money into planting many trees by hand, which need continued care and attention.

As an experienced and considerate land owner, who has developed a site which brings me much pleasure, I don't see any need for the Parish Council to go forward with this proposal.

Furthermore, I have had to put up with years of extensive building work being carried out by my neighbour at [REDACTED] with no regard for my opinion on how this alters my experience of living in the village. This has caused me a great amount of distress and upset. I have no intention to inflict this on anyone else.

Please respect my right to responsible land ownership by withdrawing your proposal.

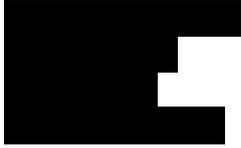
Yours sincerely,



# Stonesfield Parish Council

Stonesfield Village Hall, Field Close, Stonesfield, OX29 8HA

Email: clerk@stonesfieldpc.uk



1 October 2025

Dear ,

## **Stonesfield Neighbourhood Plan – possible designation of land owned by you as a Local Green Space.**

Thank you for your written representations in response to my letter of 6 December 2024. I am sorry for the delay in replying to those. That has been occasioned largely because of the very considerable work it has been necessary to do in giving careful consideration to the several representations made by owners of all the parcels of land proposed for designation, deciding what action should be taken in the light of those representations and drafting responses. That work is time-consuming and we are reliant upon the goodwill and unpaid work of volunteers to assist us in preparation for deliberations by parish councillors.

I attach/enclose a note of the Parish Council's consideration of your submissions, of its determination and the reasons for that determination.

Yours sincerely,



*Chair of Stonesfield Parish Council.*

### **Parish Council response**

This land achieved 80.5% support in the Village Survey for designation as an LGS; however, the landowner has objected to its designation. The land has no public access and cannot be viewed from any public right of way, either Brook Lane or the Oxfordshire Way. It therefore doesn't meet the requirements of the NPPF.

### **Conclusion**

Taking into account the landowner's representations it is recommended on balance that this parcel of land is not designated as an LGS

Dear Stonesfield Parish Council,

Thankyou for your letter regarding the proposed allocation of our land (10b) as designated Local Green Space. We object to this proposed designation and do not believe that the land is “demonstrably special to the local community” or holds any “particular local significance” for the following reasons:

- 1) The Landscape Assessment (and Appendix C Section 10 attached to the letter) refer to the views from the Oxfordshire Way as “attractive” and “significant”, while the view from Bridleway 208/3/10 is only described as “clear”. The land (10b) is not visible from the Oxfordshire Way.
- 2) Views from Bridleway 208/3/10 to 10b are very limited due to the valley topography, the tree/hedge coverage and 500m distance from the Bridleway. It is noted that high zoom has been used in the picture in Appendix C compared to the picture used on page 19 of the Landscape Assessment which shows a more realistic and distant view.
- 3) The Blenheim Land to the north of 10b along the Ridings, has greater visibility from Bridleway 208/3/10 and from The Ridings but has not been included in the Neighbourhood Plan proposed Local Green Spaces.
- 4) Site 10b is not ‘local’ in character – it is a domesticated field and is not a “continuation beyond the Dene” as stated in Appendix C.
- 5) There are no public rights of way across the land.
- 6) The Village Survey was not clear that you were referring to our land (10b) – it stated “fields behind the Garage and the White Horse”. Land 10b is neither.
- 7) Statistically, the Survey results are the definition of NIMBYism as >56% of respondents STRONGLY AGREED that every parcel of land around the village was “demonstrably special” or “significant” to the local community and that they should all be designated Green Space. In fact, our land had the lowest percentage of STRONGLY AGREED out of all of the identified areas – and therefore is the least demonstrably special or significant parcel of land in Stonesfield.

Based on the above reasons, Land 10b should be removed from the Local Green Spaces proposal.

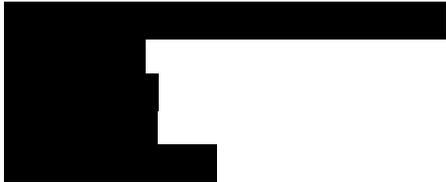
Kind Regards,



# Stonesfield Parish Council

Stonesfield Village Hall, Field Close, Stonesfield, OX29 8HA

Email: clerk@stonesfieldpc.uk



1 October 2025

Dear 

**Stonesfield Neighbourhood Plan – possible designation of land owned by you as a Local Green Space.**

Thank you for your written representations in response to my letter of 6 December 2024. I am sorry for the delay in replying to those. That has been occasioned largely because of the very considerable work it has been necessary to do in giving careful consideration to the several representations made by owners of all the parcels of land proposed for designation, deciding what action should be taken in the light of those representations and drafting responses. That work is time-consuming and we are reliant upon the goodwill and unpaid work of volunteers to assist us in preparation for deliberations by parish councillors.

I attach/enclose a note of the Parish Council's consideration of your submissions, of its determination and the reasons for that determination.

Yours sincerely,



*Chair of Stonesfield Parish Council.*

### **Parish Council response**

It is accepted that this piece of land is not readily visible from the Oxfordshire Way, although it is an important part of the landscape when viewed from the Bridleway 208/3/10. Whilst the land behind the Garage is an extension of the important Blue-Green corridor (The Dene) and should continue to be designated a Local Green Space, it does not extend to this field. The land behind the garage is clearly visible from the Oxfordshire Way, whereas this field has a limited view towards it. The argument to reject the designation on the grounds on 'NIMBYism' is not accepted, although it is accepted that the land was not clearly delineated when consulted on in the Village Survey, which said 'fields behind the Garage and the White Horse'.

Taking into account the landowner's representations it is recommended on balance that this parcel of land is not designated as an LGS

### **Conclusion**

Recommended to remove this site from the proposed designation.