

Stonesfield Neighbourhood Plan – Regulation 16

West Oxfordshire District Council (WODC) Planning Policy Review

Thank you for the opportunity to comment on the draft Stonesfield Neighbourhood Plan Regulation 16 consultation.

These comments reflect our previous Regulation 14 advice provided in May 2025 and take account of the amendments subsequently made to the draft Neighbourhood Plan in response to that advice.

As previously noted, the Plan is visually engaging and presents useful background information, including community feedback and the Plan’s development process.

As a general comment, it should be noted that the West Oxfordshire Local Plan will in due course be replaced by the West Oxfordshire Local Plan 2043. The emerging policy options and spatial strategy are already taking shape and have been subject to consultation. It would therefore be beneficial for the Plan to make reference to this where appropriate, although it is acknowledged that the emerging Local Plan is still in draft form and subject to change.

Turning to the main part of the report, as before, I have focused on the policies themselves, and the keys findings are provided below. Where no comments are provided in respect of a particular policy, this is because we have no specific feedback to offer.

Section 5: Housing

Policy SH1 – Meeting the Housing Need

In our Regulation 14 comments, we noted that this policy is more restrictive than the adopted West Oxfordshire Local Plan 2031, and this still appears to be the case.

Stonesfield is classified as a Village in the adopted Local Plan 2031, where new housing is permitted in the following circumstances:

- On sites that have been allocated;
- On previously developed land within or adjoining the built-up area (provided there is no conflict with other plan policies);
- On undeveloped land within the built-up area; and
- On undeveloped land adjoining the built-up area where convincing evidence is presented to demonstrate that it is necessary to meet identified housing needs (as identified in the West Oxfordshire Local Plan 2031).

While we welcome the reference to the West Oxfordshire Local Plan 2031, the policy remains more restrictive than the adopted Local Plan, particularly in requiring proposals to meet the Housing Needs Assessment prepared to support the neighbourhood plan which identifies no additional need for open-market housing, contrary to the West Oxfordshire Local Plan. As such, it is likely to be challenged by the Inspector.

We previously noted that the policy does not appear to address undeveloped land within the built-up area, and this remains the case.

The final paragraph also goes beyond the requirements of the Local Plan by referring to the “exceptional circumstances” test, which applies to major development only.

Policy SH2 – Size and Type of Homes

We previously advised that the proposed mix of homes should be evidence-based and I note that further information has been provided in this regard. The data appears to show a 13-year trend that 39% of the houses developed are 4+beds and there is merit in trying to address this. I would suggest that the wording of the 10% 4 beds could include scope for a smaller element of 5 beds.

Policies SH3 & SH4 – Affordable Housing Mix

As part of our Regulation 14 response, we suggested consolidating these into one overarching affordable housing policy and this recommendation remains relevant.

Policy SH5 – Needs of Older People and Disabled Residents

Duplication with Policy SH3 was noted in our Regulation 14 comments and this is still relevant.

We welcome the addition of a clause ensuring that proposals comply with other plan policies.

Policy SH8 (SH6 in Regulation 14 version) – Infill Development

The following recommendations were made as a part of our Regulation 14 comments. We note that these suggestions have not been included and so our comments remain applicable:

- Recommend repositioning this within the Plan for logical flow as dealing with locational policies first. Other locational policies should follow.
- Section f) make mention to garden development. Reword to make reference to harms resulting in the loss of private amenity space instead. There is a potential overlap with Section i)
- Section g) provides for at least one small home with two or fewer bedrooms for every proposed new large dwelling with four or more bedrooms. This is considered to be too prescriptive. Policy should be more flexible in approach but state that as per housing mix policy, smaller houses will be preferred.
- Section k). Change wording to refer to the need for safe and convenient access. Rear access may not always be the most appropriate in all cases. This Section may not be necessary as it duplicates Section j) to some degree.

We note that the other suggestions made regarding this policy have now been incorporated which is welcomed. Section j) is considered to be a bit lengthy and could be made clearer and more concise.

Policy SH9 (previously SH7) – Sub-division

We welcome the additions to this policy, however it could be further strengthened by including reference to internal space standards and the provision of external garden space.

Policy SH10 (previously Policy SH8) – Residential Gardens

We note, as suggested in our Regulation 14 comments, that reference to biodiversity net gain (BNG) has been included, which is welcomed. This could be strengthened by making reference to the statutory minimum of 10% BNG.

Policy SH11 (previously SH9) – Residential Parking

A previous suggestion to move this policy to the Transport section and merge it with Policy ST4 has not been incorporated, and this recommendation still stands.

We welcome the additions made in response to earlier comments, including clarification on whether the policy relates to residential or public parking.

The second paragraph should make clear that it only applies where a reduction in parking spaces would result in parking provision falling below the relevant parking standards.

The final section of the policy does not relate to residential parking and should be removed from this policy to avoid confusion.

Policy SH6 (previously Policy SH10) – Lower-cost Homes

As suggested in our regulation 14 comments, this policy is likely to overlap with Policy SH4 and we recommend consolidation of the two.

Policy SH7 (previously Policy SH11) – Location of Affordable Homes (RES)

I have concerns regarding reference to the Housing Needs Assessment prepared to support the Plan. This should instead refer to the Council's identified needs and I note that reservations are raised from the Strategic Housing Officer (see Page 9 of this report).

We previously recommended merging into a single affordable housing policy and this advice remains applicable.

Section 6: Economy and Amenities

Policy SEA1 – Retail, Employment and Services

We welcome that the majority of the previous comments have been incorporated. That said, parts of the policy could be made more concise and less ambiguous to improve clarity.

Policy SEA2 Protecting community facilities

The second part of this policy which refers to unviable facilities could be strengthened to make reference to the need for a robust marketing assessment to demonstrate that they are unviable, unable to be made viable or adapted to provide a viable service.

Section 7: Transport, road use and footpaths

Policy ST1 – Sustainable Transport

We support the general intention of this policy; however, we question the value of including requirements relating to EV charging and cycle storage, as these are already addressed through separate policies and regulations.

It may be helpful to clarify that the pavement improvements referenced in the policy may not be applicable within the 'narrow streets zone'.

Policy ST2 – Road Safety and Access

This policy could benefit from a map indicating the 'narrow street' zone included within the supporting text. Separate advice from the Highways Authority at the County Council is recommended.

Policy ST3 – Walking and Cycling

As part of our Regulation 14 comments, we suggested incorporating Policy SEL7 – Protecting Footpaths into this policy, and we continue to recommend this approach.

It also remains unclear whether the Highway Authority at the County Council has been consulted regarding the construction of cycling routes and pedestrian connections. We would strongly recommend liaising with them on this policy to help identify where key routes and connections would be most beneficial.

Policy ST4 – Parking

I would suggest that the first paragraph should be reworded, as it currently suggests that proposals which alter the demand or use of non-residential premises will be supported where sufficient parking is provided, when such proposals may not be acceptable for other policy reasons.

In terms of the parking standards included, these appear to exceed standards set out by the County Council which is a concern.

The final part of the first paragraph should clarify that there should be no net reduction in parking provision where this would result in an *insufficient* number of spaces.

The final section of the policy could also be clarified to make explicit that it relates to limiting *additional* parking provision, if that is the intended approach.

Section 8: Community Health and Education

We previously noted the absence of policies to support this section and we welcome the addition of policies as suggested. Our comments regarding these policies are provided below:

Policy SHW1 – Working towards better health and well-being

This policy refers to the Oxfordshire Health and Wellbeing Strategy 2024–2030; however, it is not clear whether it goes beyond the ambitions set out in that Strategy. Consideration could be given to tailoring the policy so that it relates more directly to local initiatives that could help deliver tangible improvements to health and wellbeing.

For example, this could include reference to local services and community activation, such as community activities hosted within the library or other local facilities.

Policy SHW2 – Protecting and enhancing local sports facilities

Some amendments are required to ensure this policy is compatible with the Local Plan, including Policy EH5 of the WOLP 2031. I also note that the policy extends beyond local sports facilities to include uses such as pubs, which would be better addressed outside this policy.

Where the policy refers to the need for equivalent replacement provision, this should be framed as an alternative (i.e. “or”) rather than an additional requirement alongside the other criteria. It may also be helpful to strengthen this element by requiring replacement provision to be of at least equivalent suitability or accessibility.

The policy could also be strengthened by referring to improved access by cycle, including the provision of appropriate cycle parking at sports venues.

Section 9: Countryside and Natural Environment

Policy SEL1 – Protecting the Cotswold AONB

As previously advised, the affordable housing need identified in the NP needs to comply with the District approach and therefore reference to the ‘village need’ as identified in the NP needs to be removed.

Policy SEL2 – Protecting Important Views

We note that, following our Regulation 14 comments, parts of the policy have been reworded to adopt a more positive approach, which is welcomed.

In our Regulation 14 response, we noted that *“no views are identified in this policy, rather character areas which surround the entire village. Strong justification will be needed to support this approach. Policies should not be used as a tool to prevent future growth, but rather to ensure that development respects the character of the village and surrounding countryside.”* We also queried whether *“identifying all land surrounding the village risks diluting the importance of particularly sensitive views or areas.”*

We note that the proposed views continue to be defined as character areas and still extend around the entire village which doesn’t comply with the approach taken in national and local policy. It may therefore be more appropriate to identify a smaller number of key views that warrant particular protection, rather than seeking to protect views surrounding the entirety of the village.

Finally, the policy remains relatively wordy, which makes it difficult to follow in parts. We recommend condensing and simplifying the wording to make it clearer and more concise. Some of the LLCA description could also be moved to the supporting text to improve the overall clarity of the policy.

Policy SEL3 – Protecting the Evenlode Valley

Firstly, we welcome the re-wording of the first bullet point to state that the development respects and where possible, enhances the landscape.

As noted in our Regulation 14 comments, we sought clarification on the identified building line and how this is defined. We recommended that this approach should be avoided as it’s open to misinterpretation and challenge.

As also noted in our comments, *‘the second bullet is reasonable for major development as the site falls within the Cotswold NL but not for minor’*. There is still no distinction between major and minor development and so this comment still stands.

Finally, we also advised that *‘the third bullet is highly unlikely to be supported by an Inspector as it appears to require a sequential approach whereby other sites need to be considered first and these are not limited to the neighbourhood plan area.’* This has not been amended and so our concerns still stand.

Policy SEL4 – Local Green Spaces

Strong concerns about this policy were raised at the Regulation 14 stage. At that time, we advised that the inclusion of large agricultural areas subject to rigid restrictions should be reconsidered, with the focus instead placed on the designation of smaller spaces that demonstrably hold community value.

Although some amendments have been made to the Local Green Space proposals, our previous comments remain applicable to this policy.

Policy SEL5 – Blue/Green Corridors

Please see notes from Ecology Officer regarding Biodiversity Net Gain on Page 9.

In our Regulation 14 comments, we advised that:

- *The policy is too stringent in not allowing any development in this area but should require any development to take every opportunity to enhance the environment and in particular the CTA.*
- *The requirement for development adjacent to a CTA to demonstrate an exceptional need does not comply with the Local Plan 2031 and is unlikely to be supported.*

We note that changes have not been made to this section and so our Regulation 14 comments still stand. In addition, there remains some overlap with Policy SEL3 remains.

Policy SEL6 – Biodiversity and Trees

Please see notes from Ecology Officer on Page 9.

Policy SEL7 – Protecting footpaths

We previously suggested in our Regulation 14 comments that this policy would be better placed in the Transport Section and the footpath diversions should be allowed where quality/convenience maintained.

Changes to this policy have not been made and so our original comments still apply.

Policy SEL8 – Water, SUDs and Flood Risk

We welcome the additions and amendments to this policy.

As previously advised, SuDS will not necessarily be required for all forms of development, particularly where proposals are very minor in scale.

It may also be beneficial for the policy to reference opportunities to secure biodiversity enhancements alongside flood mitigation measures, where appropriate.

Policy SEL9 – Tranquillity and Dark Skies

Please see notes from Ecology Officer on Page 9.

We welcome the addition of the fourth paragraph: *‘Artificial lighting should be avoided where possible and should not be excessive nor detrimental to the wider countryside’.*

Section 10: Historic Environment

Policy SHE1 Heritage and archaeology

Please refer to separate detailed comments from the Senior Conservation Officer on Page 11 of this report.

Section 11: Design Guidelines

Policy SBD1 – Locally Appropriate Design

Our Regulation 14 comments advised for the removal of non-design matters (biodiversity, flood risk, etc.) We note that these are still a part of the policy and so our suggestion still stands. This creates repetition with other policies including Policy SBD3

I also suggest the following:

- The policy should reference the West Oxfordshire Design Guide 2016.
- The second paragraph should remove reference to views.
- The NP states that development which threatens access to the countryside or wildlife-rich sites will not be permitted. Suggest amending to something along the lines that development which threatens access to the countryside will be resisted. Is access to wildlife-rich sites desirable as this could threaten them?
- The last paragraph of this policy states that development in the open countryside, beyond the current settlement area, should only be permitted in exceptional circumstances, which doesn't comply with the approach included in Policy OS2 of the Local Plan 2031.

Policy SBD2 - Locally Appropriate Design – Listed buildings, non- designated heritage assets and existing buildings

Please refer to separate detailed comments from the Senior Conservation Officer on Page 11 of this report.

Policy SBD3 – Locally Appropriate Design: Natural Environment

Please refer to our comments on Policy SBD1 regarding references to views, access to the countryside and wildlife sites, and development in the countryside.

Policy SBD4 (previously SBD2) – Environmental Design Standards

Our Regulation 14 comments recommended relocating reference to dry stone walling to Policy SBD1. We also suggested revising the wording to state that loss should be avoided but, where this is not possible, it should be made good, with improvements to existing dry stone walls or the construction of new walling in appropriate locations strongly encouraged. Our comments on this section therefore remain unchanged.

We also note that there is some repetition in the policy wording, with the phrase *“or that result in the permanent loss of dry-stone walls in the conservation area”* appearing twice which should be removed.

Finally, mandatory standards such as those relating to water efficiency are already addressed through other legislation and therefore may not add value in this policy. It is also unclear whether these requirements relate directly to design standards.

Policy SBD5 - Environmental Design Standards – Listed buildings, non-designated heritage assets and existing buildings

Please refer to separate detailed comments from the Senior Conservation Officer on Page 11 of this report.

Conclusion

The draft Stonesfield Neighbourhood Plan presents a strong community focus supported by a well-documented evidence base. However, a number of key revisions are required, as outlined in this report, to ensure the Plan is acceptable and fully compliant with both Local and National planning policy.

Please find below the full comments provided by WODC consultees.

Appendices – Comments received from internal departments at WODC

Affordable Housing:

It is positive that the draft acknowledges households having to leave Stonesfield due to limited housing options (5.3.3) but I think a stronger link to the policies (eg. SH1, SH3, SH4, SH6) could be beneficial in the same way that links to concerns over ageing population are specifically addressed.

The supporting text suggests (eg.5.3.4) that affordable housing need could be addressed with a small exception site. I've commented previously on the methodology for this and it seems at odds with other information, such as that relating to people leaving the village, that indicates greater demand.

Ecology:

With regard to policy SEL5 blue-green corridors, I welcome the protection of the natural environment and the requirement to achieve an overall net gain in biodiversity. Although this accords with the local plan 2032 (policy EH3), it has now been superseded somewhat by statutory BNG requirement for minimum of 10% net gain for all developments (except where exempt or out of scope). The neighbourhood plan goes against statutory BNG as it requires 10% net gain for all development without mention of the exemptions. This would therefore not be acceptable as it is not in accordance with the legislation. It could result in issues with planning decisions in the area in future. Ideally, the plan would focus more on the quality of BNG to be provided for developments that occur in the area, rather than the quantitative aspect alone. I would therefore encourage an amendment to look at how BNG should be delivered in the area, focussing on what habitats should be created/enhanced to reflect local landscape and biodiversity needs. A data search from the Thames Valley Environmental Records Centre (TVERC) would be a useful way forward, as they can provide Oxfordshire Local Nature Recovery Strategy (LNRS) details and help with identifying habitat and species priorities with the area that would aid nature recovery. BNG should be linked with the opportunities identified in the LNRS for habitat creation and enhancement – the Oxfordshire LNRS was published in November 2025 and is available to view here, including the local habitat map: <https://www.oxfordshire.gov.uk/residents/environment-and-planning/local-nature-recovery-strategy-lnrs>

Here is a screenshot of the local habitat map around Stonesfield – each different coloured polygon is essentially a different opportunity for habitat creation, restoration or enhancement in the area. If further advice is needed about this, we would be happy to discuss with the steering group or the local environment group. It is very interesting to see how the blue-green corridors in the neighbourhood plan tie in with the nature recovery network shown in the image below.

from the ground. Ideally, installation would be carried out in accordance with Swift Conservation advice <https://www.swift-conservation.org/Nestboxes&Attraction.htm>

Swift bricks can actually be suitable for house sparrows and starlings and are considered to be almost a universal bird box option, as they can cater for additional species in comparison to house sparrow boxes/terraces which would only be used by house sparrows and starlings, and not swifts. They are therefore helping two priority species for conservation as well as swifts (which rely solely on buildings for nesting, hence the prominent focus on swift bricks).

If by “bat-friendly”, they mean the installation of features for bats as an enhancement, then this should be stipulated. Bat friendly to me means using appropriate breathable membranes that have passed the anti-snagging test in conversions or re-roofing projects to retain potential for roosting bats to use roof spaces and the gaps between tiles/slates and the roofing felt, and ensuring that roosting opportunities are maintained or provided as enhancements. See more details here <https://www.bats.org.uk/advice/im-working-on-a-building-with-bats/things-to-consider-when-planning-works/roofing-membranes> Just as integrated swift bricks can be installed within the fabric of buildings, so too can bat boxes, e.g. bat tubes, bricks or access panels. You can also use ridge-tiles with gaps in for bats, modified roofing tiles, slates and vents. Integrated boxes within buildings provide a permanent, robust and maintenance-free option as compared to externally mounted boxes that may fall off and need replacing.

Section 11.7.4 refers to garden hedges and Wild privet should be added to the species list. As a species that retains its leaves during the winter, it can be an attractive part of a hedgerow, especially for screening as well as wildlife habitat. I would also recommend adding Field maple (and potentially, Blackthorn).

In Section 11.7.5 it refers to hedgehog gaps in fences, but my understanding from Hedgehog Street guidance is that these should be a minimum of 150mm or 15cm, and the text refers to 10cm. This should be updated.

Conservation:

General:

There is a lot of reference in the text to our current policies – almost written verbatim. I wonder if this could be condensed. There is no need to repeat policies – perhaps a couple of concise paragraphs that capture the essence of the Local Plan policies. Especially in light of the upcoming LP review.

In para 10.1.4 its refer to: However the source of this specific type of limestone was limited, and mining drew to a close in the early years of the 20th century.

A fact check:...is it because the limestone was limited or did mining draw to a close because of new incoming materials such as Welsh slate / bricks etc.? This can be answered by knowing whether there are still extant stone seams in the area that could still be worked.

The Policy SHE1 Heritage and Archaeology:

Para 1 refers to non-designated assets – but there is also a separate policy (SHE2) for NDHAs. Perhaps this term should be removed from here.

To make Paragraph 1 and 2 more concise they could combine para 1 with para 2: For example: ...designated and non-designated assets, and potential archaeological remains, including their setting...

In para 2 & 3: it would be better to mention significance instead of values. This is to keep it consistent with the NPPF e.g. para 3 could read...its surroundings and preserve or enhance heritage values significance of assets that may be affected.

There is a repeat of the requirement for assessments (and proportionate assessment) – which is okay, but all of the types of assessments mentioned (e.g. HIA, HS, desk-based assessments and field evaluations) could be made more concise with one paragraph stating the types of assessment required for heritage assets.

For consistency under Aims of this policy use non-designated instead of undesignated. Likewise there is reference to listed and non-designated historic assets in para 11.4.1 - there needs to be consistency - so the sentence should read: Groups of listed designated and non-designated heritage historic assets.

Section 11: Building and Environmental design guidelines

Para 11.2.3 - 11.2.5 are beneath the section on 'Settlement Type'. The paragraphs at this location is a little odd, they refer to vernacular character of cottages, buildings, and then to sustainability and climate change - they may need to move to buildings / architecture?. This para should focus on what they wish to achieve in terms of future development following the settlement pattern / historic landscape character or similar.

Policy SBD2: Locally appropriate design:

Not all development to a LB is supportable. So I would like to see a caveat with regard to LBs: something like... 'where development is supported by the LPA (aligned with legislation, guidance and policy)' alterations and extensions to designated heritage assets...etc...

The first para is a little mixed up - it refers to LBs / NDHAs then it refers to the overall character of the village (character and appearance), views and takes focus away from the assets - it should be more specific towards preserving and / or enhancing the heritage assets where appropriate.

It refers to application requirements for Heritage assessments again...repeating the SHE policies. This could be more concise.

The text following the policies: There is a lot of text repeating LP policies, HEs Conservation Principles - this could be more concise.

Policy SBD5: Environmental Design Standards

I would like to see a caveat here that refers to seeking advice from the LPA for any alterations to energy efficiency measures to LBs.

Leisure:

Re Pg 26/27 noted that headings relate to 'Recreation' and 'Young People' but that content has no reference to sport. Wording notes 'Consider a skate park next to the tennis court to encourage outdoor fun and exercise, or other leisure space' - are they able to add in include 'sport' as in 'or other sport/leisure space'.

Re Pg 66 (Sct 6.4) Sports, recreation and community facilities. Noted that no reference is made to WODCs Playing Pitch Strategy. You could add in wording such as 'The Neighbourhood Plan draws upon the district's 2022 Playing Pitch Strategy (refreshed 2024) as part of the evidence base to assess current and future needs for outdoor sports provision and in particular refers to football, cricket and tennis provision at Stonefield Playing Fields and the need to maintain pitches and improve ancillary facilities. The Local Football Facilities Plan 2025 also highlights refurbishing the changing pavilion as a Priority Project. The PPS provides useful analysis of pitch supply, demand, and quality, and its recommendations have been considered in shaping local policies for the protection and improvement of sports pitches and facilities.'