

## OXFORDSHIRE COUNTY COUNCIL'S RESPONSE TO THE FOLLOWING CONSULTATION:

**District:** West Oxfordshire

**Consultation:** Stonesfield Neighbourhood Plan 2041 (Submission Document)

**Team:** OCC Property

**Officer's Name:** Samuel Pocock

**Officer's Title:** Senior Corporate Assets Officer

**Date:** 16 February 2026

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### Comments

Oxfordshire County Council (OCC) owns the land containing the Stonesfield Primary School buildings, its associated playing field to the rear and car parking and grassed area to the front of the school. OCC Property notes that Stonesfield Parish Council proposes a number of designations that will affect the OCC land. Accordingly, OCC Property wishes to make clear that they **strongly** object to these designations and are disappointed that the Parish Council has failed to not only publish our previous comments, but also to take them into account.

### Procedural Matters

Section 15 of the Neighbourhood Planning (General) Regulations 2012 (hereby referred to as the "Regulations") makes clear that a Neighbourhood Plan (NP) submission for examination should be accompanied by a Consultation Statement which:

- a) *contains details of the persons and bodies who were consulted about the proposed neighbourhood development plan;*
- b) *explains how they were consulted;*
- c) *summarises the main issues and concerns raised by the persons consulted;*  
*and*
- d) *describes how these issues and concerns have been considered and, where relevant, addressed in the proposed neighbourhood development plan*

OCC Property has reviewed the Consultation Statement that was submitted with this NP and considers that it does not meet criteria b), c) and d), as it does not contain the objection of the OCC Property to the designation of the school playing field as a Local Green Space (LGS). The Examiner will find attached with this representation email correspondence between our agents acting on our behalf and the Parish Council Clerk, including the Parish Council's response which demonstrates that OCC Property objected from the early stages of the NP to the proposed LGS designation. These can be seen at Appendix A, B and C.

It is also noted that the consultation period has been extended due to a failure from either the Parish Council or West Oxfordshire District Council to submit key documents showing the public comments received and responses to their feedback. Unfortunately, the discussions between OCC Property and the Parish Council were not published. This omission casts further significant doubt on whether the Parish Council has submitted an adequate Consultation Statement that meets the

requirements of Section 15 of the Regulations, as it is unclear as to what other type of information has been omitted from the Consultation Statement.

Consequently, it is respectfully requested that the Examiner does not proceed with the examination of this NP until the Consultation Statement has been updated to include all of the comments and feedback that was received during the publication of the NP and demonstrate each of these were considered to ensure that the NP meets Section 15(1)b of the Regulations.

### **Policy SEL2 – Protecting important views**

OCC Property supports the objective of this policy to control development proposals in order to ensure that the local character of the NP area is maintained and enhanced, when possible.

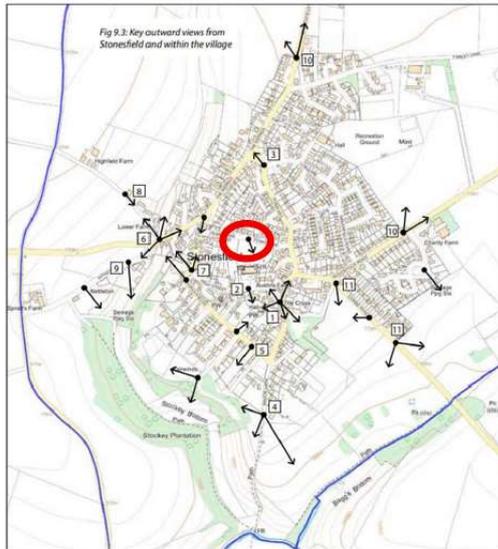
Nonetheless, in the second column of the policy text it is highlighted that: “*Key inward and outward views are shown in Figs 9.2 and 9.3.*” Figure 9.3 currently shows an arrow crossing over the OCC land in a south eastern direction without providing either a reference or an explanation as to the reasoning behind this proposed designation. The eleven points outlined in the supporting text on page 85 also do not cover this proposed important view. OCC Property considers that there is nothing special that could justify protecting this view, as it overlooks a school playing field with its play equipment together with school buildings. In addition, no robust assessment has been undertaken to justify this designation and demonstrate its significance to the local community.

Following a review of Appendix D Character Assessment, it appears that this particular view had previously been highlighted due to its location within the conservation area. Notwithstanding this, the Character Assessment makes clear on page 76 that the primary views that contribute positively to the setting of the conservation area comprise *views “over open rural, agricultural and valley areas.”* Neither of these are applicable to the OCC land, as it comprises a school building and its playing field in an urban setting within the heart of the settlement.

Drawing from this, it is the understanding of OCC Property that the Parish Council agrees with this position and that is why it is not mentioned in the supporting text. It also appears that Figure 9.3 was never amended to reflect the current position and an earlier version was inserted in the NP document instead.

Accordingly, OCC Property recommends the following minor modification to ensure that the NP is in compliance with the Basic Conditions and particularly accords with national policy seeking to facilitate the expansion of education facilities and promotes sustainable development.

**Remove black arrow as shown on Figure 9.3, page 85 and circled in red below.**



### **Policy SEL4 – Protecting Stonesfield’s Local Green Spaces – 13. Primary School playing field**

OCC Property urges the Examiner to look at our previous comments that are attached to this representation. For the sake of avoiding unnecessary duplication, these will not be repeated. OCC Property has reviewed the Local Green Space Assessment (Appendix C) that was undertaken to support the designation of the OCC land and has concluded that it is flawed as it contains inaccurate and misleading statements.

The assessment of the OCC land can be found at Appendix C, page 26. The reasons given for the proposed designation are reiterated below in italics:

*“affords a tranquil resort to pass for the many villagers, especially the elderly unable to venture further afield, who take a short walk for exercise within the village including within their route Peaks Lane and High Street, which both pass alongside it;”*

First, the OCC land proposed for designation comprises a grassed area to the front of the school and its playing field to the rear. OCC Property would like to make clear that this is **private land** and not accessible by the public, as it could endanger the safety of the pupils attending the school. In addition, OCC Property questions how a school playing field could be described as a “tranquil resort” when there would be children playing and screaming most of the time during the day.

*“is central to the Conservation Area and is therefore subject to the restrictions applying to conservation areas (see 2b above);”*

OCC Property considers that this statement clearly demonstrates that the OCC land benefits from additional planning controls due to its location within the conservation area. Therefore, and as per paragraph 011 reference ID: 37-011-20140306, the land should only be designated if there would result in additional local benefits. No such case has been made in this NP and it is also significant to highlight, once again, that OCC is the owner of the land.

*“has for decades been the main facility for recreation for the pupils of the school;”*

This statement acknowledges that the land has no public recreational value, as it is only used by the pupils and staff of the school. It is significant to highlight that should the Examiner accept this designation; it will be much more difficult for OCC to discharge its educational duty and meet the expanding needs of the school. Therefore, the LGS designation poses a significant risk to the longevity of the school and its playing field which this NP has failed to take into consideration.

*“incorporates the Forest School, tree planting and nature-friendly garden areas and a playground as well as sports facilities;”*

OCC Property considers that none of the aforementioned features are demonstrably special that could justify the designation of the OCC land.

*“is regularly used for village-wide events, e.g. fetes;”*

OCC Property considers that the frequency the site is used for public events is not a material consideration when assessing the suitability of a site for LGS designation. Especially when these events could take place yearly.

*“has a recreational value, tranquillity when not in use by schoolchildren!) and wildlife value of undeniable local significance;”*

As highlighted earlier above, this is privately owned land solely for use by pupils and staff of the school. It therefore has no recreational value to the public. No evidence has also been submitted to prove that its wildlife value is demonstrably special to the local community.

*“achieved 91.4% support for designation in the Village Survey”*

OCC Property wishes to highlight that a LGS designation should be underpinned by a robust assessment and not be based on a popularity contest. OCC Property is concerned that the respondents of the Village Survey may have been misled, as they were never explained the implications of designating the school playing field as a LGS given that it clearly contradicts the aims and objectives of this draft policy and NP as a whole.

Drawing from the above, OCC Property considers that the land with reference “13. Primary School playing field” should not be designated as a LGS as it is not demonstrably special to the local community and does not hold a particular local significance in respect of its beauty, historic significance, recreational value, tranquillity or richness of its wildlife. In addition, it has been demonstrated that the land already benefits from different types of designations that protect it from development and is also owned by a public body, OCC.

Consequently, the following minor modification is recommended to ensure that the NP meets the Basic Conditions and specifically has regard to national policies, in particular paragraphs 106 to 108 of the NPPF, and advice contained in guidance

issued by the Secretary of State, such as paragraph 11 of the PPG, and contributes to the achievement of sustainable development by not restricting the school from expanding in the future to meet a certain identified need and OCC from carrying out its statutory duty.

**Delete “13. Primary School playing field” from policy text on page 87.  
Amend Figure 9.4 by removing LGS reference 13 on page 87.**