

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

Our Ref: 448 0421 JF

By Email: [planning.policy@westoxon.gov.uk](mailto:planning.policy@westoxon.gov.uk)

12<sup>th</sup> May 2026

Dear Planning Policy Team,

**Stonesfield Neighbourhood Plan**  
**Stonesfield Neighbourhood Plan Basic Conditions Addendum document**  
**Representation made on behalf of Oxford Dioceses Board of Finance (ODBF)**

**Introduction**

- 1.1 Bluestone Planning welcomes the opportunity to comment on the compliance of the Stonesfield Neighbourhood Plan (SNP) with the revised Basic Conditions which are set out in the Basic Conditions Statement Addendum April 2026.
- 1.2 For the avoidance of doubt, the following comments should be read in conjunction with the representations we made during the Regulation 16 consultation period on 9<sup>th</sup> March 2026.
- 1.3 Following review of the addendum to the Basic Conditions document, we are concerned the proposed draft NP policy SEL4 – Protecting Stonesfield’s Local Green Spaces has failed to adequately consider the Local Nature Recovery Strategy (LNRS) of the area by proposing the allocation of **LGS 6 – Churchfields allotments** which would significantly and demonstrably conflict with the potential measures (PM) set out in the LNRS.
- 1.4 We consider that **LGS 6 – Churchfields allotments** should be deleted to ensure that this NP as a whole complies with the new legal requirement introduced by Section 98 (contents of a neighbourhood development plan) of the Levelling-up and Regeneration Act (LURA) 2023.

### **LGS 6 – Churchfields allotments**

2.1 We do not agree with the statement on page 10 of the Addendum to Basic Conditions Statement document which informs the reader that:

*“The Local Nature Recovery Strategy (LNRS) for the area that includes the area of the Stonesfield Neighbourhood Plan is the West Oxfordshire Nature Recovery Plan 2024-2030.”*

2.2 Whilst we do agree that the document produced by the District Council is helpful, the Stonesfield Neighbourhood Plan Steering Group (SNPSG) appears to have completely disregarded the actual Local Nature Recovery Strategy document which was finalised by Oxfordshire County Council (OCC) in November 2025. This document contains four key elements:

- Local Habitat Map
- Statement of Biodiversity Priorities
- Species Priorities List
- Description of the Strategy Area

2.3 The Local Habitat Map<sup>1</sup> sets out a main priority with more detailed PM that should be followed to ensure the improvement of the biodiversity of a relevant area. The wording used in the OCC document is identical to the wording introduced by Section 98 (part ii) and iii)) which demonstrates that this document should be considered when assessing compliance of a NP policy with the LNRS and not only the document produced by the District Council which explains how these measures could be achieved.

2.4 An extract from the interactive Local Habitat Map is shown below. The southern part of **LGS 6 – Churchfields allotments**, which also falls within the Northern Evenlode Conservation Target Area, is within a priority area with the following PM:

*“Create and/or enhance community and local growing spaces, community farms, and allotments to improve soil health and benefit biodiversity”*

---

<sup>1</sup> <https://experience.arcgis.com/experience/ea43e0bc07c044ef8ca4b16803c5e59c>



- 2.5 This PM highlights the significance of enabling development that enhances community growing spaces, such as the village allotments. We are concerned that the introduction of an additional layer of protection (Green Belt) will make it significantly more difficult to implement this PM in this location. It is considered to be common ground that the purpose of Green Belt is not to enhance biodiversity, and therefore this proposed designation would impose additional restrictive barriers which would conflict with the PM of the LNRS and CTA.
- 2.6 Whilst it is appreciated that the planning use of allotments is most of the time considered as agriculture and modest structures associated with this primary use would not be considered inappropriate in the Green Belt, this does not apply to all structures and mixed-uses. For instance, gates, fences and modest structures to be used for community and education purposes with the aim to improve biodiversity, soil health and overall promote the community spirit of the area.
- 2.7 A LGS designation would significantly restrict the allotments from being used for community and educational purposes as these uses would be considered inappropriate development in the Green Belt and a decision-maker would have to assess the impacts on the openness of the Green Belt as a result of a potential material change of use or erection of structure. It appears that this has not been carefully considered and the proposed LGS designation could potentially be fatal to the prospects of the proposed PM being ever achieved on this site either in the short or long term.
- 2.8 It is appreciated that only part of the allotments (falling within the CTA) falls within the LNRS, and therefore the examiner could suggest the de-designation of only part of this site. Nonetheless, this is likely to cause confusion to a decision-maker as the allotments is viewed as a single land parcel and there are no physical features which could differentiate the parts located within the CTA and LNRS from the areas located outside. Accordingly, a more

precautionary and appropriate approach is considered to be the de-designation of the whole allotments site to ensure that the PM described in the LNRS, and in simple words the enhancement of the allotments to enable the improvement of soil health and biodiversity, will not be prevented by designating the site as a LGS and introducing further planning constraints.

### **Conclusion**

- 3.1 The legal requirements introduced by Section 88 of the LURA 2023 have necessitated the need to consider the policies of this NP against the LNRS for the area, which is considered to primarily comprise the document published by OCC in November 2023.
- 3.2 The SNPSG suggests that the aim of the LGS is “*to protect green areas of importance to the village for sport, physical activity and amenity use for the health and wellbeing of the community*”. Therefore, it does not conflict with the priorities and PM of the LNRS.
- 3.3 It is considered in this instance that the SNPSG has failed to consider in detail the implications the designation of the village’s allotments as a LGS could have to the prospects of restricting or preventing the enhancement of the allotments, as set out in the LNRS.
- 3.4 The improvement of the allotments in line with the PM of the LNRS for the benefit of soil health and biodiversity would become much more difficult, if it is designated as a LGS because the local community will be restricted with the type of improvements they could implement (examples include community and education uses) to achieve this priority. This contradicts the objective of the SNPSG to designate this site for the wellbeing of the community.
- 3.5 Consequently, we wish to maintain our previous objection and urge the Examiner to consider recommending the minor modification of Policy **SEL4 – Protecting Stonesfield’s Local Green Spaces** and delete **LGS 6 – Churchfields allotments** to ensure that this NP meets the Basic Conditions and relevant legal requirements, and can therefore be recommended to proceed to referendum.

Yours faithfully,



**Panos Konidaris**

Principal Planner

[panos@bluestoneplanning.co.uk](mailto:panos@bluestoneplanning.co.uk)

01235 766825