



## Sutton Courtenay Parish Council

### Minutes for the Parish Council meeting held on Tuesday 28<sup>th</sup> June 2023 at the Village Hall Sutton Courtenay, commencing at 7.15pm.

Present: Councillors Rita Atkinson (chairman), Joanna O'Callaghan, Hugo Raworth and Jason Warwick.

In attendance: 0 members of the public.

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- 2023/111 Apologies for absence  
Apologies for absence were received from Councillors Robert Dalby, Teresa Field, Lyn Hodder, Father Morkos and Fiona Wolveridge.  
As previously agreed, the Clerk was not in attendance.
- 2023/112 Declarations of Interest  
No declarations of interest were received.
- 2023/113 Hobbyhorse Lane North Planning Appeal  
Site Address: Land north of Hobbyhorse Lane, Sutton Courtenay, OX14 4BB  
Description of development: Residential development up to 175 dwellings (Outline Planning Application with all matters reserved except means of access to the site from Frilsham Street) and associated works (as per amended plans and documents received in June 2022 and 25 August 2022).  
Application reference: P21/V2682/O  
Appellants name: Roebuck Land & Planning  
**RESOLVED** that the draft Appeal Statement would be submitted. (See following pages.)  
A vote of thanks would be recorded for the contribution of the Parish Council's Planning Working Party.
- 2023/114 HIF1  
(a) Commissioning a barrister  
**RESOLVED** that Jack Smyth of No5 Barristers Chambers would be commissioned to advise on the HIF1 application.  
(b) Preparations ahead of the County Council's meeting  
The County Council's Planning Committee meeting scheduled for 26<sup>th</sup> and 27<sup>th</sup> June had been postponed as Officers required more time to prepare their report.
- 2023/115 Rights of Way S106 Project (Recreational Amenities working party)  
**RESOLVED** that the matter would be deferred to the July meeting.

#### Close of meeting

It was noted that the next ordinary meeting of the Council would be held at 7.15pm, on Tuesday 4<sup>th</sup> July. There being no further business the Chairman declared the meeting closed at 7.45pm.

Signed.....

Dated.....

## APPEAL STATEMENT ON BEHALF OF SUTTON COURTENAY PARISH COUNCIL

PINS REF: APP/V3120/W/23/3322187

Residential development up to 175 dwellings (Outline Planning Application with all matters reserved except means of access to the site from Frilsham Street) and associated works (as per amended plans and documents received in June 2022 and 25 August 2022).

LPA REF P21/V2682/O – REFUSED 23 November 2022

PUBLIC INQUIRY COMMENCING 5<sup>TH</sup> SEPTEMBER 2023

### 1.00 INTRODUCTION

1.01 I am instructed by Sutton Courtenay Parish Council to make strong representations in support of the DISMISSAL of the above Planning Appeal. In addition to this written Statement, I intend to attend and make oral submissions at the Public Inquiry scheduled for September 2023, taking account of any new matters addressed in the Proofs of Evidence of the main parties and any relevant changes in circumstances.

1.02 Copies of representations made by the Parish Council during the application process have been supplied by the Planning Authority and remain relevant.

1.03 The current Appeal has been preceded by two previous Outline Applications for the same site, both unsuccessful.

- The first was submitted in 2015, was appealed on non-determination in 2017 and was scheduled to be the subject of a Joint Public Inquiry in January 2018 with another nearby site (APP/V3120/W/17/3181043 – DEVELOPMENT EAST OF HARWELL ROAD, SUTTON COURTENAY.) The Parish Council was a Rule 6 Party for both. The Harwell Road Appeal was withdrawn 5 days before the Inquiry was due to start.
- The Hobbyhorse Lane Appeal (continued but was then postponed on 1 July 2018 due to illness of the Appellant Counsel. Shortly before the Inquiry was due to resume, after the Parish Council had provided additional evidence in accordance with timescales set by PINS, that Appeal was also withdrawn after the Appellants advised they had been unable to complete work on the required drainage/flood risk mitigation strategy. Costs were awarded to the Parish Council for both Appeals.
- Subsequently, a duplicate Application Ref P17/V1963/O which had been made in July 2017 (a week before the above Appeal was made) was refused by the Planning Authority in August 2018. A copy of that decision is attached at APPENDIX 1.

1.04 As described below, Sutton Courtenay Parish Council (SCPC) has consistently reviewed all evidence provided by site promoters and Applicants/Appellants since the site was first proposed for development during the Local Plan process of LPP1 in 2012. SCPC considers that the specific site circumstances render this site unsuitable for residential development in principle and in detail. The attempts made by the Appellant in this case and in previous cases have been unable to demonstrate that the site is genuinely suitable for the development proposed.

### 2.00 SCOPE OF OBJECTIONS TO THE APPEAL SCHEME

2.01 The VoWH has refused the Appeal application for the 6 reasons shown on the Decision Notice (DN) of November 2022 and SCPC supports that decision. This Statement focusses on those matters which are within the knowledge and expertise of SCPC, making reference to independent research and the opinions and experience of local residents.

2.02 In addition to a general understanding of the site and its environs, the Parish Council has particular familiarity with the site due to owning/managing the adjacent Village Hall and recreation ground. Access and parking issues along Frilsham Street and Hobbyhorse Lane, footway issues, complaints of odour impacts from the adjoining former tip site, frequent reports of surface water flooding and the village wide issues over chronic traffic congestion are all regular features of concern to residents and the Parish Council.

2.03 The Statement is structured under the following main headings:

A. The principle of development (3.00)

B. Matters which are known to be constraints to development:

- 1) Local Highway Network Capacity (4.00)
- 2) Unsuitability of access route (5.00)
- 3) Flood and drainage concerns (6.00)
- 4) Odour and living conditions (7.00)

## 5) Contamination risks (8.00)

## C. Other matters (9.00)

## D. Conclusions on The Planning Balance (10.00)

## 3.00 MATTER A: ALLOCATION OF SITE IN LPP1/PRINCIPLE OF DEVELOPMENT

3.01 In accordance with the overall Spa al Strategy directing new residential development to (inter alia) identified Larger Villages, Sutton Courtenay was recognised as in principle suitable for additional housing in the emerging Local Plan Part 1 (LPP1).

3.02 The Appeal site was included as the major part of SUTC07 in Appendix 22 of the 2014 SHLAA, as one of a list of 19 potential sites following an earlier Call for Sites and adoption of an assessment methodology. It is made clear that only high level assessment was undertaken at that time, but the methodology required assessment of factors which are still in dispute at the time of this Appeal (My underling below).

## Extract from 2014 SHLAA report

1.18. Our emerging Local Plan Part 1 sets out strategic priorities for the district to deliver sustainable development in light of a new housing target arising from the Oxfordshire Strategic Housing Market Assessment (SHMA). For the purposes of this assessment, we have assessed the suitability of sites at a high level. Site suitability has been considered in line with the draft guidance, which includes the following criteria:

- Physical limitations or problems such as access, infrastructure, ground conditions, flood risk, hazardous risks, pollution or contamination;
- Potential impacts including the effect upon landscape features, nature and heritage conservation;
- Appropriateness and likely market attractiveness for the type of development proposed;
- Contribution to regeneration priority areas;
- Environmental/amenity impacts experienced by would be occupiers and neighbours.

1.19. The draft guidance states that sites which have particular policy constraints should be included in the assessment for the sake of comprehensiveness but these constraints must be set out clearly, including where they severely restrict development<sup>6</sup>.

3.03 At APPENDIX 2 I attach a copy of APPENDIX 22 of the SHLAA. In my view it fails to identify correctly all the significant factors that constrain site development by stating under physical constraints- NONE (small power line through field) – ignoring many of the above relevant criteria. It does note that access is via a small lane and appropriate access will need to be identified. It fails to note the substantial problems of surface water flooding/high groundwater levels, unpleasant odour and contamination risks.

3.04 The Parish Council raised concerns about site suitability throughout the Local Plan process, working with members of Sutton Courtenay Action group (SCA). Representations were made at the subsequent EIP where the site was proposed for allocation for 220 dwellings on Site 5 – East of Sutton Courtenay. These concerns included the unsuitability of Hobbyhorse Lane/Frilsham Street to accommodate resultant traffic and the practical constraints to delivering off site highway mitigation measures in the immediate area, as well as on the local congested wider network. Concerns were also raised over the unproven ability to mitigate flood risk, to address landscape impacts, to control noxious odours and address contamination through gas migration (See APPENDIX 3 – Statement from Mr David Hignell who a ended the EIP as the SCPC representative). It is clear from his statement that deliverability was a matter of contention.

3.05 Mr Robin Draper, who appeared at the EIP for SCA, provides an independent Statement to this Appeal. He also explains that the objections at EIP caused concern to the Inspector, to probe witnesses on genuine deliverability. The Inspector was assured by other parties that other access options were available, including an access to the north linking to the B4016 Appleford Road. On other matters and overall, the site promoters confirmed in written submissions during the EIP that: ‘There are no known constraints to delivery of development on this site.’ (Bidwells for Redrow Homes p.1.17 Matter 9). I note also that in the site viability assessment of SHLAA sites no allowance was made for abnormal costs on this site.

3.06 In my professional opinion and in that of my client and local residents, experience subsequently has shown that their objections were sound. There are a range of significant practical issues which require solutions prior to establishing that the site is suitable for development in principle.

3.07 On access along Frilsham Street, the Inspector was sufficiently concerned to amend the reference to this within the site brief parameters via modification (MM42).

Extract from EIP Inspectors Report

131. Similarly, site 5 (around 220 dwellings east of Sutton Courtenay) is a suitable scale development for this settlement. Whilst MM42 and MM43 are necessary to provide more clarity in the site development template regarding access arrangements and sewer upgrades, I have seen no evidence to convincingly indicate that, in this regard or in terms of the nearby landfill site or water/waste water infrastructure, the site is either inappropriate for housing or not deliverable. Nonetheless, in the light of consultation comments, I have amended MM43 to delete reference to any specific access points.

3.08 A copy of the Track Changes version is attached at APPENDIX 4. The Inspector will see that there were several important issues that had not been resolved at the time of Allocation and adoption of LPP1.

3.09 The Adopted version of the Site Development Template in APPENDIX 5 in fact removes all reference to access via Frilsham Street and instead leaves the access undefined – recognising none has been identified as definitely appropriate. It is obvious that this was a problem that had not been satisfactorily investigated and resolved.

Access and highways:

- Investigate access arrangements. Contribution and/or onsite mitigation towards countryside access will be sought from the development.
- Contribute towards future strategic infrastructure improvements to Abingdon-on-Thames and any necessary mitigation measures identified through the site Transport Assessment.
- Relocate existing bus stops at High Street Garage closer to the junction of the High Street with Frilsham Street, along with improved infrastructure (e.g. shelters) and footways.
- Contribute towards the cost of an enhanced frequency of bus service (route 32) between Didcot and Abingdon-on-Thames via Sutton Courtenay.

3.10 While the Inspector concluded in 2016 that he had no convincing evidence at that time to establish that deliverability was unclear of the site inappropriate, the view of SCPC is that detailed assessment via the planning application process on three separate occasions has demonstrated that the site is inappropriate for development as proposed, and that adverse impacts cannot be adequately mitigated. In the Planning Balance, continuing concerns weigh heavily against an allocation made when evidence before the Inspector was very limited. SCPC consider that the site should not have been allocated. This is now a matter that will need to be revisited in the emerging new Joint Local Plan.

3.11 I turn now to the scale of new development in and around Sutton Courtenay. The Inspector is asked to refer to the plan included at the end of APPENDIX 22 to the 2014 SHLAA (APPENDIX 2). This shows the geographic extent of the settlement and commitments for growth at that time. This baseline situation is important when considering the Inspectors view that Sutton Courtenay could accommodate an extra 220 new houses.

3.12 Existing permissions on large sites were limited to two sites north of Milton Road, with an approved shared capacity of 70 units. Subsequent permissions over three sites have delivered 127 north of Milton Road (an additional 57).

3.13 The development of the former Amey brownfield site south of Appleford Road, outside the village was not identified in the SHLAA. This largely developed site now has permission for 212 additional units. Ignoring any smaller schemes, cumulatively 281 new homes have been approved and will be delivered since the SHLAA was relied on as the baseline for LPP1.

3.14 Sutton Courtenay has grown in house numbers and population more than was anticipated when the appeal site was allocated in the Local Plan Part 1 (LPP1), without commensurate improvements in local facilities. The village has no doctor, dentist, bank, supermarket, employment centre, post office, library, dispensing pharmacy, nursery/playgroup for pre-school children under 3 or secondary education.

3.15 While the addition of 220 homes was considered a ‘suitable scale development’ in 2016, that scale has already been exceeded on other approved and largely implemented large sites (212 +57 = 287). SCPC considers that the addition of a further 175 homes, which together with these unanticipated approvals would result in growth of 462 new homes since adoption of LPP1 delivering

a 42% growth in village homes within the Plan period (based on published 2015 estimates), would be hugely disproportionate and detrimental to village identity and character.

- 3.16 With few facilities within the village, leisure, employment, secondary education and shopping trips are likely to increase significantly throughout the week and at weekends. Existing facilities are scattered throughout the village rather than in a village centre, giving little opportunity for developing cohesiveness and assimilation of the expanded population. The Parish Council is genuinely concerned that with excessive growth on a few large estates the village will lose its distinctiveness and become a dormitory to other larger settlements. This is not the intention of the Local Plan, which aims to scatter growth around villages in the area, enabling them to preserve their individual village identity in a sustainable manner.
- 3.17 Finally, I have considered whether there is such an urgent need strategically for delivery of this site that problems of significance should be set aside. The most up to date HLS position is that there has been no under delivery in the past 3 years and that the LPA can demonstrate a supply of at least 6.8 years. In the published report (APPENDIX 6 November 2022 HLS Report) the Appeal site is classified as a Category B site in accordance with NPPF advice. “where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.”
- 3.18 As is evident from the schedules within the report, the Appeal site is not included within the supply relied on to be delivered within the 5 year period and does not form part of the 6.8 years supply.
- 3.19 There is therefore no urgent strategic need for an approval to be granted to support the delivery of this site at this time.
- 3.20 A Draft (Reg 16) Neighbourhood Plan for Sutton Courtenay (NP) has very recently concluded its public consultation stage, and an Examiner will be appointed over the summer. The Draft Plan acknowledges, as it has to, that the Appeal site has been allocated in the districts Local Plan LLP1. This does not indicate NP support for the development.
- 3.21 Bearing in mind the significant growth that has already occurred, no additional housing allocations are proposed in the NP, but emerging policies support sensitive infill and small scale redevelopment to deliver housing to meet local needs and reflect village character. Additionally, the Plan seeks to ensure that the design and location of new development is resilient to the effects of climate change and flooding – a matter of particular importance in an area where flood risk from both river and groundwater is significant. The Neighbourhood Plan carries limited weight in decision making at this stage but does indicate the direction of travel for local planning policy.

#### SUMMARY OF FINDINGS IN RELATION TO THE PRINCIPLE OF DEVELOPMENT

- 3.22 Drawing conclusion from the above review in Section 3.00:
- 1) The site was allocated in LLP1 in the absence of clear evidence of deliverability;
  - 2) Significant growth of a greater scale than was considered appropriate for the village has subsequently taken place;
  - 3) The addition of the proposed 175 new homes would have a detrimental impact on the identity and scale of the village, which has limited facilities to support sustainable growth;
  - 4) There is no urgent strategic need for permission to be granted for the development of the site.
- 3.22 The remainder of this statement identifies specific issues which demonstrate that to depart from the LLP1 Allocation Policy and to refuse permission for development of this site is supported by sound evidence.

#### 4.00 MATTERS WHICH ARE KNOWN TO BE CONSTRAINTS TO DEVELOPMENT: LOCAL HIGHWAY NETWORK CAPACITY

4.01 There is no dispute between the parties that the local highway network is operating in excess of capacity and suffers from severe congestion – to such a degree that in recent years applications and appeals for single dwellings and even a householder extension in Sutton Courtenay have been refused. The main blockage point is at the Sutton/Culham Bridges, just north of the village, which provides an important Thames crossing. Schemes have been identified for minor flow improvements via signalling adjustments, but these would do little to ease congestion overall and simply redistribute the queuing time.

4.02 The congestion also has major impacts on movement in and around the village, due to queues daily extending across the northern junction of High Street and Drayton Road. Gridlock is the most appropriate term. The Police response to consultation succinctly describes the current situation as ‘highly fraught’. Drivers become impatient and attempt to push in. Tempers escalate. Cyclists are particularly vulnerable. The Police response continues:

‘I do not believe that the route through the village is currently suitable for the volume of traffic that this development would create, creating a potential risk of highway safety issues and associated community tension. This will create additional demand on local policing.’

4.03 Oxfordshire County Council relies on improvements being delivered by the HIF1 scheme to construct a new road northwards from Didcot, creating an alternative new river crossing and links to the strategic road network. In summer 2021, new traffic generating development was refused planning permission pending delivery of HIF1. While the timetable for delivery of that scheme has now in 2023 been acknowledged to be delayed, the Highway Authority in 2021 adopted a ‘Releasing development Strategy’ to allow modest amounts of development to progress in anticipation of early delivery, subject to the following criteria:

- Development site housing build programmes/trajectories/occupations being aligned with (or a result of) the delivery of HIF 1 which will require occupation thresholds/controls on development sites.
- Development sites to provide agreed sustainable/active travel infrastructure at the beginning (early occupations) of development sites to reduce traffic impact on the highway network prior to HIF1 delivery.
- New services or enhancements to existing bus service arrangements being implemented at the beginning (early occupations) of development sites.
- Local off-site and on-site highway works to be delivered at the early stages of development to lessen the direct impact of a development site on the highway network.
- Travel Plans prepared and approved by the council’s Travel Plan team with deliverable and monitored targets.
- Strategic transport/highway contributions will be sought in accordance with Regulation 122 and the three Section 106 tests.

In respect of the Appeal site, the strategy states that:

- Development sites of 10+ houses that will generate new vehicular movements in the morning and evening commuter peak periods are no longer to be objected to by TDC officers on traffic impact (HIF1) grounds. This is on the basis HIF1 funding has been secured and OCC is confident in delivering HIF1. (my emphasis)

4.04 The provisional agreement reached between the Appellant and the HA at the time of the refusal was that a small proportion of the 175 houses could be built and occupied in advance of HIF1 delivery, subject to a suite of earlier works and secured financial contributions. While the advance delivery number was originally 43 (by reference to an agreement reached during the Dismissed Appleford Road Appeal), this now needs to be reviewed as the delivery date for HIF1 used in modelling forecasts and anticipated when the ‘Releasing development Strategy’ was adopted has now been postponed from 2024 to 2026. At the time of writing SCPC has no clarity on how many (if any) early delivery units could be permitted in the opinion of the Highway Authority.

4.05 The Appellants’ transport Assessment (TA) confirms that a significant proportion of additional traffic from this greenfield site will feed north directly into the location of existing severe congestion. While induced traffic volumes and congestion are anticipated to increase over time generally and cannot be offset by additional public transport in the absence of a dedicated bus route, the development of this site will have an immediate adverse impact, directing traffic into the worst affected part of the network, further impacting on the lives of

existing village residents by increasing queues within the built up part of the village and potentially impacting on pedestrian and cyclist safety.

- 4.06 The Inspector is asked to note that in the opinion of SCPC the timely (2026) delivery/completion of HIF1 is by no means certain. Planning permission for the new road has not yet been granted and is subject to very substantial objections. These objections are not limited to the classic concerns of landscape and visual impacts, noise, light pollution and drawing traffic through surrounding villages, but include fundamental concerns about the scope of the Environmental Assessment, absence of alternatives considered, climate change strategy and compliance with adopted

Policies. There is a significant risk of a request for a Call-In to the Secretary of State.

- 4.07 The scheme will also be subject to a CPO Inquiry, as yet unscheduled. Detailed construction design of all related works is unknown and will be subject to a value engineering process, and contracts and funding will need to be secured in full. The anticipated costs of the scheme have escalated and par al additional funding has been sought and secured, but Government has confirmed that any further costs will have to be borne by the County Council and developer contributions.

- 4.08 In this context, the SCPC believes that the 2021 County Highway Authority decision to allow traffic genera ng development sites to be implemented on the basis that ‘HIF1 funding has been secured and OCC is confident in delivering HIF1’ (by 2024, now postponed to 2026) is an unsafe approach, likely to exacerbate current severe conges on to the detriment of both Highway safety and convenience. The date of delivery of the full HIF1 scheme, essential to resolve current problems, has been postponed and may well be adjusted further into the future to accommodate due processes and funding.

4.09 Questions must arise over the principle of gran ng outline permission for 175 units when it is known that the traffic consequences of only a small proportion of them would be tolerated (despite unavoidably adding to conges on etc for a temporary period). There are substantial up-front site preparation costs involved prior to housebuilding in this case (off site highway improvements, overhead cables to be buried, earthmoving/importation of soil to create platforms above existing ground levels and SUDS, gas migration mitigation and major sewer upgrade in addition to normal site costs). Once these works have been implemented, it could be the case that the developer will seek a variation to the S106 to allow additional units to be occupied, particularly in view of the public benefit of Affordable Housing delivery. SCPC considers that the LPA could have considerable difficulty in resisting a variation to S106 terms. In the worst-case scenario, there is a risk that the development could be wholly implemented without HIF1 being in place.

#### SUMMARY ON LOCAL HIGHWAY CAPACITY ISSUE

- 4.10 This development of 175 new homes will generate unacceptable additional traffic into an already severely overloaded part of the highway network. Any additions will therefore have a severe impact. This provides a sound reason for refusal in accordance with the NPPF advice at p.111:

Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

- 4.11 The only resolution of this problem currently lies in the early delivery of the HIF1 scheme in advance of/within the early stage of the life time of any planning permission granted. Without certainty over the timing of that delivery, the Appeal scheme should be considered to be premature and unproven to be acceptable.

#### 5.00 CONSTRAINTS TO DEVELOPMENT: UNSUITABILITY OF ACCESS ROUTE

- 5.01 Unlike other large housing sites constructed during the Plan period in Sutton Courtenay (Milton Road and Amey site, Appleford Road), the Appeal site does not have direct access onto a main through road. Instead it lies at the end of a cul de sac of variable width, with on street parking, narrow footways, multiple private driveways and crossovers. Additionally, Frilsham Street then Hobbyhorse Lane provides the primary link for users of a well-used BOAT /National Cycleway route, which also links to employment centres, and is the only access to the Village Hall and associated community facilities.

5.02 SCPC finds the consultation response of the Highway Authority as reported in the Committee Report to be faulty in many respects. A statement submitted by Parish Councillor and local resident Mr Hugo Raworth (APPENDIX 7) thoroughly considers the matters of detail design and layout on the highway and concludes that there are significant problems with:

1. Lack of Compliance with Manual for Streets on road and footpath design
2. No safe pedestrian crossing and dangerously narrow footpath by bus stop
3. Loss of on street parking due to road widening
4. Removal of Green Canopy with adverse impact on local character
5. Numerous dangerous Footpath Crossfall Trip Hazards
6. Dangerously Narrow Bottleneck at the East End of Frilsham Street
7. Road Widening Opposite Village Hall Not Possible
8. Road Widening by Site Accessway Not Possible
9. Unsuitable emergency access
10. Lengthy use by Construction Vehicles (5-year construction programme due to scale of development)

5.03 I note that the Transport Statement states that traffic generation from the development will be in the region of 237 movements in total during the morning peak hour (183 outward), with all of these travelling along Hobbyhorse Lane and Frilsham Street to the junction with High Street. Frilsham street is not straight and is used for on street parking, which can easily reduce the two lanes to single flow.

5.04 National trends and local experience point to a growing number and frequency of home delivery vehicles and home working. These two factors are only likely to increase on street parking, causing interruptions to two-way movements along the highway with more vehicles using the centre of the carriageway (See Photographs in APPENDIX 7).

5.05 At the junction with High Street, the TA shows a split between north and south movements. However, there is only space for a single line of queuing traffic- frequently compromised by on street parking. (Stantec Drawing 1:250 50010-5501-002A) so these cannot happen simultaneously.

5.06 I am not a professional transport consultant or highway designer, but logically it seems to me that it is extremely unlikely that the waiting time for vehicles turning north from this junction will reduce slightly while vehicle numbers increase substantially, as shown

in TA Table 6.3. SCPC instead anticipates that peak time queues will develop, adversely affecting existing residents and potentially affecting pedestrian and highway safety where no pedestrian crossing is present close to a bus stop. The Inspector is asked to explore the accuracy of the statement at 6.4.3 that:

The results in Table 6.3 shows that the High Street/ Frilsham Street junction operates with spare capacity in all scenarios with minimal queuing and delay.





Existing Frilsham Street/High Street junction – build out proposed to LH side to improve geometry. Note narrow width to accommodate waiting additional vehicles turning north and south and absence of pedestrian crossing.

Access to the Village Hall

5.07 The Village Hall lies immediately adjacent to the site access at the end of the cul de sac of Hobbyhorse Lane. It is run as a Charity by Trustees aided by volunteers, with the Parish Council owning the freehold and having the role of custodian Trustee.

5.08 This is one of the few community buildings in Sutton Courtenay and is well used by clubs and for private hire. In the current Neighbourhood Plan process, it was identified by respondents as a priority for expansion and modernisation. It currently has a main hall with a seating capacity of 120 and a bar/kitchenette, a committee room accommodating 30, a kitchen and toilets. Allotments, a tennis court and a Scout Hut adjoin, together with a car park with a capacity of circa 30 cars in a standard arrangement (up to 45 if double parked).

5.09 The main building is regularly used every weekday evening except the third Tuesday in the month which is left for ad hoc bookings and during most days. A weekly youth session is held, a keep-fit class is held three times a week, weekly yoga, fencing and martial arts classes. This programme of events attracts people from within the community and from outside the village. Scouts and Cubs use the site throughout the year.

5.10 On weekends it is a very popular venue for family/children's parties and christening, baby shower, naming etc parties. It is one of the very few halls in the area that is able to accommodate an indoor bouncy castle and that makes it very popular for children's parties.

5.11 It is used as the village polling station for elections, the designated emergency centre for the primary school, public exhibitions and public inquiries. The annual produce show takes place here as does an annual performance by the village amateur dramatics group. The school uses it as a venue to bring the children to see the Christmas pantomime arranged for them.

5.12 It is therefore a significant attractor at all times for vehicles, pedestrians and cyclists, frequently arriving and leaving in groups within a short time period. The inadequacies of footpath widths do not present significant problems as there is currently no passing traffic. In addition, the car park is also subject to casual/unauthorised parking use by dog walkers, hikers and cyclists using it as the starting point for a journey along the BOAT. As a volunteer /charitable organisation, the Village Hall management team are reluctant to take formal enforcement action to prevent this, and it is generally dealt with via discussion if it conflicts with other users.

5.13 There are occasions when overflow parking takes place on Hobbyhorse Lane and Frilsham Street. This also is usually not a problem as there is no passing traffic. The area has a single street light.

5.14 The Appellant submissions and the Highway Authority responses during the application process fail to take account of the impacts of the proposed development on this well used key local Community infrastructure. Mr Raworth explains that in the immediate vicinity of the Village Hall that an MfS compliant roadway and path suited to the combined use by cyclists, walkers and vehicles cannot be delivered.

5.15 SCPC is very concerned about the potential for vehicle and vehicle pedestrian conflicts outside the Village Hall due to the considerable number of turning movements into the Village Hall car park, within a very short distance (30m) of the new access serving 175 houses, on the same side of the road. For example, drivers leaving the Appeal site would turn straight into the numerous cars and pedestrians, including children, exiting the access after evening Scout meetings. The separation distance between the two access points appears to be inadequate to ensure safety. It is unclear as to whether new street lighting is proposed.

5.16 The extension of Hobbyhorse Lane to create a site entrance very close by, generating significant new passing vehicle traffic during both the proposed 5 years of construction and permanent occupancy would adversely impact on community use of the Village Hall and on the safety of visiting pedestrians and cyclists.



Capacity parking at Village Hall for regular evening event 27<sup>th</sup> June 2023, including overspill on highway verge

5.17 Men on is made of a potential TRO to yellow line the route. This is likely to be met with robust objections during the Consultation process and be considered unacceptable, as residents and Village Hall users reasonably rely on on-road parking for visitors and their own use, as well as deliveries. At the eastern end of Frilsham Street/Hobbyhorse Lane, it is likely that if on-street parking was restricted, displaced casual and overnight use of the Village Hall car park would increase substantially, creating knock on management issues, conflicts with those visiting events and consideration of the installation of gates. The Village Hall access is currently the turning area for refuse vehicles for the immediate locality.

**Adverse impact on BOAT /SUSTRANS Cycle route 5 users**

5.18 SCPC considers that insufficient weight has been given in the application process to the adverse impacts of the scheme on users of the BOAT (referred to as a Byway on Stantec drawings). This is identified as a main route for cyclists and walkers in the Didcot Garden Town LCWIP, promoting active travel. The route is promoted for increased use as part of a network linking Harwell Business Park, Milton Park and Culham Science Park. The BOAT is also regularly well used by horse riders, local dog walkers, long distance walkers and local residents.

5.19 BOAT users currently decant into a relatively quiet road. Traffic volumes are to increase substantially immediately adjacent to the junction. The proposed arrangements where the BOAT meets the new access road are considered unlikely to be sufficient to prevent conflicts with those

turning out of the new estate. The road design requires the removal of trees in this area, which currently provide an attractive gateway to the exit from the village.

5.20 SCPC draws attention to the considerable adverse impacts of routing construction traffic along Frilsham Street and Hobbyhorse Lane, which the Appellants confirm will take up to 5 years. On a project of this scale and construction duration these matters go to the heart of the issue as to whether this is a suitable site in principle.

(a) Frilsham Street/High Street junction

The geometry of the junction with High Street makes turning movements for larger vehicles entering from or leaving to the south extremely awkward/HGVs forced to swing across the carriageway. This is a location close to the two bus stops on narrow footpaths used by schoolchildren daily, with many crossing over High Street. High Street and Frilsham Street are both well used cycle routes in peak times. There is no alternative exit to the road network for local residents. Together these features mean that high volumes of construction vehicle movements at this junction will increase risks to pedestrian and cyclist safety and the risk of collisions. I can find no evidence that construction vehicle tracking has demonstrated safe movements are possible.

(b) Overhead Cables

Overhead electrical power lines cross Hobbyhorse Lane and Frilsham Street. It is estimated that the 400V Cables are at an elevation of around 4 to 4.5m, with the 11kV Cables being around 6m above ground level. There is a significant risk that without costly diversions and disruption to supply, these cables would be struck by larger vehicles – particularly mobile cranes, piling rigs and HGV's loaded with roof trusses.

(c) Hobbyhorse Lane/BOAT/Construction Site Entrance

It is difficult to see how conflicts between BOAT users (walkers, cyclists and horse riders) and construction vehicles can be resolved unless the BOAT access is relocated, supervised at all times or closed. The latter would be totally unacceptable over a long period. Sustrans National Cycle Route No. 5 is a key component of Dicot Garden Town's Local Cycling and Walking Infrastructure Plan (LCWIP) connecting major science and technology sites in Science Vale UK

(d) On street parking

Unlike the other large sites developed in the village which have direct access to a main road, construction traffic will need to squeeze between residents parked cars and domestic delivery vehicles, which can reduce visibility of pedestrians especially children. Risks of personal and property injury will increase.

(e) Condition of road/Utilities

The main sewer for the village lies under the access route and needs frequent repair. The poor condition of the road is evident on a visit. There is a risk to damage of both underlying structures and the surface as a result of long term use by HGVs and specialist equipment.

5.21 While Conditions and an enforced CMP can control hours of work, debris on the road etc and prevent off site parking, residents will be subject to significant additional noise and disturbance throughout the construction period, affecting their enjoyment of their homes. For some, the worries associated with passing construction vehicles may lead to undue stress and poor mental health.

5.22 This is a large development which will take years to build. The access route is wholly unsuitable for use by a large number of HGVs for delivery of materials, site portacabins, soils, earth moving machines, cranes and other construction equipment.

**SUMMARY ON UNSUITABILITY OF ACCESS ROUTE**

5.23 Access to the site is the only Reserved Matter for determination at this time. It cannot be reasonably separated from a decision to approve the Outline Application. Site access for 175 new homes is proposed via a minor road which does not meet current design standards.

5.24 The problems of using Frilsham Street and Hobbyhorse Lane as the access route for this large site have been recognised since the site was first promoted in the VoWH LPP1, more than 10 years ago (See Section 3.00 above). Despite 3 applications for Outline permission including detailed design of the offsite works required, no adequate solutions have yet been identified to deliver a safe route for all construction traffic and long term use by the residents of 175 new homes. SCPC considers that no

adequate solutions can be accommodated within available land, due to physical, watercourse and ownership constraints, having regard to patterns of use.

5.25 The proposed alternative emergency access via Frilsham Street (northern spur) is inadequate. Upgrades to meet standards would have adverse impacts on the semi-rural local character of the route.

5.26 The proposed off site works will have adverse impacts on existing residents, and on the use of the Village Hall and associated facilities in the future. Impacts during the construction phase carry significant risk.

5.27 The Transport Assessment fails to acknowledge that the road is used by existing residents and visitors for on-street parking, impacting on vehicle movements. The conclusion that a more than 100% increase in traffic along Frilsham Street in the morning peak will not adversely impact on waiting times at the junction with High Street is unlikely. The substantial increase in traffic along the access route conflicts with promoting use of the National Cycleway Route 5 and BOAT.

5.28 The adverse impacts of using Frilsham Street and Hobbyhorse Lane to access the proposed development site are so substantial that Planning permission should be refused.

## 6.00 CONSTRAINTS TO DEVELOPMENT: FLOOD RISK ISSUES AND IMPACTS ON LANDSCAPE AND SITE CHARACTER

6.01 The site is proven to suffer frequent surface water flooding and has high groundwater levels creating frequently waterlogged ground. The solution offered by the Appellant is to raise ground levels on the western part of the site to create an elevated development platform and to adopt a strategy where eastern parts of the site can continue to flood, including 3 basins designed to contain standing water.

6.02 To achieve this, soil will be transferred within the site, with any shortfall met with imported material (unspecified volume). The resultant target ground levels are shown on Surface Water Drainage drawing Ref: 46720/4005/001 E.

6.03 By reference to the submitted drawings, the SWD measures include the use of land outside the red line boundary of the Application site. As this extraneous land is not shown to be within the control of the applicant and is understood to be in the ownership of FCC Environmental Ltd, it is unclear whether the scheme can be delivered in its entirety. (SCPC has been unable to find any comprehensive report submitted by the Appellants to explain the relationship between the on site and off site pond areas to link with the strategy shown on plan and sections).

6.04 The elevated parts of the site will be graded to meet existing levels on the site boundaries. The 3 eastern basins for water capture/storage are contained by steep eastern bunds (Stantec Drawing 46720-4005-002B) lined with an impermeable geomembrane to prevent seepage through the embankment.

6.05 Within the site, estate roads are lined with 2m wide swales which direct flows into the basins, two of which are connected by a weir. Individual buildings will be set 0.15m higher than the made ground level. As discussed below, gas migration mitigation (as initially proposed) will require a trench on 3 sides of the site, set back from boundary trees and hedgerows. This can reasonably be called a highly engineered form of development. It is easy to agree with the pre-application advice given by VOWH that a Full rather than an Outline application only including access was necessary to enable a comprehensive appraisal to be undertaken.

6.06 By comparing the Land Use Parameters Plan (1547.08E) with the SW drainage drawings, it can be seen that the majority of the proposed Public Open Space (east of the basins) will be subject to flood or waterlogging. A large part of the area shown as available for youth play is instead shown as housing on the more detailed layout in the Drainage Plan. The indicative site for allotments appears to lie within the flood zone. Conflicts between these drawings need to be resolved.

6.07 In response to concerns raised by VOWH on the practical use of the POS, the Appellant has responded:

### VOWH concern:

The FRA shows areas of winter ponding on the lowest area of the site, this was listed as having been observed in 2016, 2018 and 2020/2021. This area covers part of the POS and even when ponding is not seen on the surface the soil is likely to be wet for the majority of the winter making this area less usable as POS. A clear design will be needed of the POS to ensure access and usability of most of the POS through all seasons, those areas which are likely to become inaccessible need to be designed with this in mind. Again, the play space should be outside any area potentially impacted from surface water flooding.

Appellant response:

Where footpaths in the POS pass through areas subject to surface water flood risk, it is proposed that there would be a raised timber boardwalk on hardwood stilts to ensure year round access.

SCPC confirms that there are numerous occasions in recent years when there has been standing water on the site for extended periods. It is regularly waterlogged.

6.08 The elevated walkways do not make the whole of the identified undeveloped area accessible for use. The overall developed character is of elevated houses set within a watery landscape. This is distinctly different from the character of existing built development close to the site, and it is not accepted that the statement in the LVIA will be achievable:

4.10. The scheme will be visually attractive, respecting the context, form and type of existing built form and building styles evident within the locality

Rather than reflecting the local character of an historic village, the development scheme will be distinctively different. While SCPC is keen to see any new development in the village is climate resilient and of a high quality design, it has serious concerns that what is proposed would be an enclave of such distinctive design overall that it would not reflect local character in any way.



STREET SCENE ONE



STREET SCENE TWO

#### Illustrative elevations provided by Appellant in DAS

6.08 The information provided by the Appellant does not demonstrate that sufficient usable Public Open Space is available within the site to deliver the 15% of site area required in a Masterplan. While it will provide a green/blue area of visual amenity, it is not usable by site residents for normal use throughout the year. Conversely, it does not demonstrate that 175 new dwellings can be accommodated at the same time as meeting other site requirements.

6.09 A Landscape assessment (LVIA) has been provided and correctly identifies high sensitivity receptors as footpath users, BOAT users and local residents. The author confirms that on the western boundary: 'Due to the close proximity of these new dwellings their roofscape will inform the skyline.' i.e. be immediately visible.

6.10 It is unclear whether the LVIA took account of the detailed site level changes submitted at a later date. The evidence now is that the building platform will create ground elevated up to 1.17m, with two storey house elevated a further 0.15m at FFL.

6.11 A management company will be required to ensure that swales and links to the basins are maintained free from blockages in perpetuity. This will restrict landscape and tree planning opportunities throughout the site.

#### SUMMARY ON FLOOD MITIGATION MEASURES AND IMPACT

6.12 The SCPC believes that the proposed development, as a result of Flood attenuation measures and their impact on site layout, will be an assertive form of development out of character with its setting and neighbours, without adequate on-site open space and play facilities.

6.12 As confirmed on the DN, VoWH takes the view that the proposed flood risk management/mitigation scheme discussed above fails to demonstrate that it will be effective. SCPC does not have access to professional and technical advice on this matter, so limits these submissions to a consideration of the scheme as proposed. However, it strongly supports VOWH in demanding that a functioning adequate resilience strategy needs to be demonstrated to be deliverable before Outline planning permission can be considered to be appropriate.

#### 7.00 CONSTRAINTS TO DEVELOPMENT: NOXIOUS ODOURS

7.01 A Statement has been submitted by Parish Councillor Mr Hugo Raworth (APPENDIX 8) which sets out how extensive and frequent complaints are in relation to the unpleasant odours which affect the eastern parts of the village, emanating from composting operations further east (FCC Sutton Courtenay). It is certain that new residents on the Appeal site would experience the same problems, due to site location and greater proximity to the source.

7.02 It is normally the case that if controls exist via other legislation, planning controls over odour are limited. However, the experience of numerous residents over many years has been that the environmental controls that do exist to prevent the nuisance caused are wholly ineffective in this case. Living conditions are seriously affected with gardens judged unusable for recreation or laundry drying, and windows needing to be kept closed in warm weather, when odours are generally worse.

7.03 The juxtaposition between existing homes in the village and the source of odours is historic. The problem may in the long term be eliminated, but the earliest this might happen with the proposed closure of the facility is 2030. Applications have been made to extend the life of the facility in the past. At this point, it is uncertain whether approvals might be given in the future.

7.04 The composting facility is lawful and is subject to specific controls. It is stated consultation responses and in the Officer report that ‘These processes are exempt from action for statutory nuisance under the Environmental Protection Act 1990 without the specific authorisation of the Secretary of State.’ The Environment Agency declined to comment on the application. It would appear that nothing can be done to prevent odours continuing as currently experienced.

7.05 It is unreasonable to place 175 new homes within a location where the problem has proven intractable over many years and persists at the time of this Appeal.

7.06 Both the NPPF and the Local plan (Policy 24) advise against allowing new development where odours likely to cause harm to health and living conditions are present.

NPPF 119. Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions

NPPF130. Planning policies and decisions should ensure that developments:..... (f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users

## SUMMARY ON IMPACT OF ODOURS ON NEW RESIDENTS

7.07 At this time and for the foreseeable future, the unavoidable nuisance caused by unpleasant odours renders the site unable to deliver a good quality, healthy living environment for new residents and is therefore not sustainable development. It fails to meet the requirements of LLP1 Policy 24 (ii) and NPPF paragraphs 119 and 130.

## 8.00 CONSTRAINTS TO DEVELOPMENT: CONTAMINATION RISK

8.01 During the application process, a vent trench was shown on plans submitted to follow three sides of the site. This was required by VOWH and agreed with the Appellants advisors as an essential part of the strategy to address the risks of gas migration from the adjoining now closed old waste p. The trench was shown as additional to shielding measures to each individual dwelling and its general location was indicated on drawings and taken into account in the arboriculture report.

8.02 The Appellants Statement of Case at 5.46 states that a view has now been taken that no vent trench is required. It would appear from subsequent paragraphs this change is in response to the Committee decision to refuse the application.

The Appellant’s position on mitigation against potential ground gas migration departs from the negotiated position reached at the OPA determination stage. The Appellant’s case on appeal is that there is no requirement whatsoever for additional mitigation in the form of a Gas Vent Trench (GVT) to be delivered around the site perimeter to achieve gas protection above CS3 level.

8.03 SCPC has long been concerned on behalf of residents on the potential for gas migration from the closed Hobbyhorse Lane landfill site. The EA has confirmed that rather than the contents being only non-inert domestic refuse and food waste as described by the Appellant, contents include ‘industrial wastewater, sewage sludge and chemical wastes mixed with municipal solid waste’ as well as household waste. There is no dispute that this type of waste has the potential to produce methane.

Part of the solution is to provide trenches with water to dissolve gas and carry it off site to the north.

8.04 The Appellant points to a land drain aligned with the eastern boundary of the Appeal site, c55-60m from the appeal site’s eastern boundary. This trench was intended to

collect migrating groundwater (and hence any dissolved gases) before they potentially could reach the appeal site.

8.05 SCPC has on several occasions noted and recorded that this land drain appears to be overwhelmed with water, which spreads and puddles over a wide area of waterlogged ground contiguous with the site boundary, potentially carrying gas westwards towards the new homes.

8.06 While it is hoped that gas emissions will reduce continuously over time, there is no evidence that it is no longer present. In these circumstances a secure mitigation strategy to prevent gas migration is required.

8.07 The decision to omit the vent trench at this late stage is perverse. Its omission would eliminate constraints on provision of underground services and the need for ongoing maintenance, but these are development costs that should not be balanced with a safe mitigation solution.

8.08 The Appellant states in the Appeal SOC:

5.69 The part of the field that is between the appeal site and the FCC restored landfill area (i.e. the balance of the housing allocation) is owned by FCC and VoWH is fully aware of this ownership through comments made to the OPA by FCC. Despite the risk of landfill gas migration being minimal, and the proposed gas mitigation strategy being proposed at a higher level than required, it is reasonable to assume that in the event of a control system failure, should it be required, FCC could remedy the situation as it could locate a replacement or additional vent trench on its own land – either on the restored landfill site or on the eastern edge of the 50m strip of land it owns alongside the appeal site.

8.09 This is unconvincing. Firstly, by the time a control system failure was identified, the incident would have occurred. Secondly, the corridor of land identified is shown on the Drainage Drawing for the Appeal scheme as already subject to high groundwater levels and ponding.

#### SUMMARY ON CONTAMINATION RISKS FROM FORMER LANDFILL SITE

8.10 SCPC has reasonable concerns that the Appellant is unable to demonstrate that an adequate mitigation strategy can be delivered for the site. On this matter SCPC supports and relies on evidence provided by VoWH in support of RR3 on the decision notice.

#### 9.00 OTHER MATTERS

9.01 In the analysis above, conclusions have been drawn on specific issues identified, similar to those topics listed in RR 1-5 on the notice of Refusal.

9.02 Cumulatively, one main additional matter emerges. The development proposed is constrained by various significant factors, which together unavoidably result in a form of development which would cause harm to the character of the village on this, a highly visible transitional greenfield site between the built-up area and open countryside.

9.03 The elevated building platform above surrounding land, limited opportunities for new tree planting on a site where frontages will need to be kept free to provide swales, need to accommodate flood storage areas, absence of usable open space and resultant consolidated form of development all lead to a form of development which will not reflect high quality design or local character. The scheme will appear as a distinctly separate estate, poorly related to its surroundings.

9.04 The necessary off site works to provide access along Frilsham Street and Hobbyhorse Lane, including the removal of trees important to local character at the site entrance and the junction with High Street, will also harm local character.

9.05 At this Outline stage, no detail is provided on a street lighting strategy. However, at present there is a clear eastern boundary to the developed southern part of the village, running parallel to the High Street. There are no buildings or street lights east of a line running through the Village Hall.

9.06 The Appeal site would create an extrusion into this light-free area of open land, significantly changing the pleasant rural setting of the Recreation Ground to the north and would be clearly visible in longer views from the northern part of the village.

9.07 For all the cumulative reasons described, the Appeal scheme would have an adverse impact on Local village character contrary to Core Policies 37 and 38 of LPP1.

#### 10.00 THE PLANNING BALANCE

10.01 Planning law requires that applications for planning permission be determined in accordance with the Development Plan, unless material considerations indicate otherwise. In this case, evidence amply

demonstrates that there are substantive Material Considerations which indicate that the Appeal should be dismissed.

10.02 Although this is an Outline application, with access only to be determined, the Planning Authority has rightly required supporting information sufficient to demonstrate how 175 houses could be accommodated on the site before any permission is granted. In the view of SCPC and in my own professional view, the available evidence is that the development proposed does not constitute sustainable development as required by the NPPF and would result in substantial harm to issues of importance.

10.03 It is not appropriate for a decision maker to give overriding weight to the fact that this is a VoWH LLP1 Allocated site. The detailed LPP1 site policy (APPENDIX 5) makes it clear that there are substantive matters requiring investigation and policy and design requirements to be satisfied even at Outline stage. It is unreasonable to postpone consideration of the detail of these to Reserved Matters stage, as they need to be known to be deliverable.

10.04 While delivery of the site would meet LPP1 housing objectives and so attract some weight, it is not urgently needed (ref 3.17-19 above) and it first needs to be demonstrated that the site can be developed sustainably. That is the role of the Outline application – to enable detailed consideration rather than the high level assessment undertaken in the LPP1 process.

10.05 No Viability argument has been presented by the Appellant to seek delivery of Affordable Housing at a lower level than the 35% required by adopted Policy. The provision of 61 AH units in Sutton Courtenay would be a public benefit but it is no more than the proportion required from all large development sites. This aspect should be afforded neutral weight in a balancing exercise.

10.06 On the other side of the Balance sheet, there are substantial reasons for dismissal. The matters listed below should carry substantial weight in the decision, as cumulatively they demonstrate that the proposed development is not sustainable in the terms described in the NPPF and the Local Plan.

- (i) Severe adverse impacts on an already overloaded local road network for a currently unknown period of time, increasing delays for all and likely to reduce safety and increase risks of harm.
- (ii) Failure to provide adequate well designed access without adverse impacts on the safety and convenience of highway users - insufficient road width, inadequate pavements, multiple steep crossovers, on street parking, conflicts with cyclists, proximity of access to Village Hall car park etc.
- (iii) Total unsuitability of Frilsham Street/Hobbyhorse Lane to provide access for construction traffic without numerous adverse impacts on safety for local residents.
- (iv) Adverse impact on local village character resultant from accommodating essential drainage strategy on site and encroachment of built development beyond natural limits of the settlement.
- (iii) New residents would experience unacceptable odours which would adversely impact on amenity, health and well being and the reasonable enjoyment of their homes.
- (iii) Failure to demonstrate that risks of gas migration from closed landfill site can be adequately mitigated.

10.07 On behalf of Sutton Courtenay Parish Council I urge the Inspector to DISMISS the Appeal.

Deirdre Wells Dip TP MRTPI  
Red kite Development Consultancy for SCPC  
June 2023

#### APPENDICIES (not included with minutes)

- (i) Personal Statement of professional competence
- 1 DN refusal of previous Outline on same site 2018 (P17/V1963/O)
- 2 APPENDIX 22 to 2014 SHLAA – Assessment of Sites considered for LPP1 Allocation at Sutton Courtenay
- 3 Statement from 2016 Parish Councillor David Hignell re EIP representations
- 4 Site Development Template showing Modifications
- 5 Site Development Template – Adopted as part of LPP1
- 6 VoWH Housing Land Supply Statement November 2022
- 7 Statement of Parish Councillor Mr Hugo Raworth on access matters
- 8 Statement of Parish Councillor Mr Hugo Raworth on Odours