



Sutton Courtenay Parish Council

Minutes for a meeting of the Parish Council held on Tuesday 6th October 2026 at Sutton Courtenay Village Hall, commencing at 7.15pm.

Present: Councillors Rita Atkinson (chairman), Christopher Campbell, Robert Dalby, Paul Galliver, Cathy King, Joanna O'Callaghan, and Lia Plowman.

Absent: Councillors Ian Pratley, Hugo Raworth, and Jason Warwick.

In attendance: Jennie Currie, Clerk; County & District Councillor Stevens; 2 members of the public.

2026/135 Public Participation

A resident raised a concern regarding application P26/V3534/FUL, that the Highways Officer had asked for new surfacing for the access route across the registered Village Green which is outside of the application area.

2026/136 Apologies for absence

Apologies for absence were received from Councillors Ian Pratley, Hugo Raworth, and Jason Warwick.

RESOLVED that a leave of absence until the end of December 2026 would be granted to Councillor Jason Warwick.

2026/137 Declarations of Interest

Councillor Campbell declared a non-pecuniary interest in application P26/V3534/FUL under item 2026/139.

2026/138 Minutes for the meetings held on Tuesday 1st September 2026

RESOLVED that the minutes of the meetings held on Tuesday 1st September were a true and accurate record, and would be signed by the Chairman.

Cllr Dalby joined the meeting at 7.19pm.

2026/139 Planning applications

(a) Planning applications to be considered

RESOLVED that the following observations would be submitted:

- P26/V1357/RM - Land North of Hobbyhorse Lane, Sutton Courtenay, Abingdon - Objection. Three documents would be submitted covering Conditions 5, 9 and the S106 agreement. These are included after item 2026/149.

Cllr King joined the meeting at 7.36pm.

2026/139 Planning applications

(a) Planning applications to be considered - continued

- P26/V3534/FUL - Land adjacent to 8-10 The Green Sutton Courtenay –
Objection:

The site plays a vital role in the historic setting of the Conservation Area and the numerous Listed buildings around the Green, this significance is much valued and recorded in the Neighbourhood Local Plan and the "the Sutton Courtenay Character Assessment". The site terminates the key vista to the east and forms a corner leading the eye in depth to Churchmere Road and the dwellings facing it.

The current proposal does not fulfil this role. Whilst the materials are more in keeping with the area than the previously withdrawn application the design still dominates the plot and is now wider at the ridge than the previous design. This is at odds with the Green's domestic vernacular predominantly shallow plan cottages with steeply pitched plain tiled roofs, this notably including dwellings nos 8 to 12 and no.14 the Green on the south side of Churchmere Road.

Considering the amenity, i.e the open space, of nos 8 to 10, this space will be cramped and dominated by the forecourt and parking to the new dwelling, and the principal elevation to no.10 will be presented with a 2 storey high gable end elevation. Considering no.14 the Green, (which is relatively low lying), its aspect onto Churchmere Road will be dominated by the other gable end, a mere 10 metres.

In spite of external works to the site recently carried out, the open visual nature of the land still exists and some of this essential character could be retained with a less dominant and bulky proposal. This would also give more breathing space to the existing dwellings whereas the current proposal is overbearing and alien in its historic setting.

The Parish Council has noted the Highways Officer's comments of 28th September 2026. Within the comments the Officer asks that the existing vehicular access is improved. The access route crosses over the registered Village Green which is outside of the applicant's land and not part of the application. (It belongs to the Parish Council.) The access route is subject to an easement providing vehicular access to 10 The Green only, (there is no vehicular access to 8 or 9 The Green) and part of that easement prevents the existing surface from being altered.

- MW.0117/26 - Sutton Courtenay Waste Management Centre, Appleford Sidings
- Objection

Sutton Courtenay Parish Council objects to application MW.0117/26 which asks permission to remove Condition 77. This condition was imposed through the 2015 planning permission. Condition 77 mandates that infrastructure - such as the pipework associated with landfill gas and leachate management systems - must be laid below the surface, and that associated wells must not protrude above the final restored land level once site restoration is complete. This was a key condition to ensure the restoration to a greenfield site once operations had ceased.

Restoration

OCC Planning Officers have previously stated in their Officer's assessment report for another s73 (MW.0167/23) submitted by FCC that 'the site is land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures, it is by definition in the National Planning Policy Framework (NPPF) not previously developed land i.e. for planning purposes it has greenfield status.'

OCC Planning Officers have long recognised the requirement to restore the site to a greenfield site. Exposed pipework and wells do not constitute restoration to a greenfield site but rather a

quasi-industrial landscape with numerous hazards with exposed pipework and gas vents. Residents have long waited for the return to a greenfield site. Sutton Courtenay Neighbourhood Plan (SCNP) Policy SC11: - Former Mineral Workings – states ‘Following the restoration of the site concerned, development proposals for nature conservation and/or recreation of land previously used for the extraction of minerals will be supported.’ The surface-laid pipework and protruding wells will make the aspirations of SCNP policy SC11 impossible to implement.

The applicant has provided bare minimum information, there is no clear plan showing what the restored land would like with exposed pipework and protruding gas wells and how this would be compatible with a green field site designation. The applicant has not provided any details showing how many wells would remain visible, and to what extent after restoration, how high they would be, how extensive the surface pipe network is likely to be.

When condition 77 was imposed it was to allow gas pipes on the surface for a temporary five-year period, so they could be inspected and repaired. This was to be followed by their burial to remove the significant visual impact. The current application asks to remove the condition entirely. That is a substantial change from a temporary practical measure. The applicant has not provided a full explanation as to why this is necessary beyond convenience and by extension cost. No optioneering on potential alternatives has been undertaken. For years, the applicant has been operating the site on the understanding they would need to conform to Condition 77 and has, therefore, previously accepted it. What has changed?

The extant Condition 3 requires all FCC operations to cease on the site by 31st December 2030. The extant Condition 4 requires the submission of a phased Restoration Plan of the site to meadows, woodland, and agricultural/farmland use. The purpose of restoration is to leave a properly finished landscape, rather than something that continues to look like an operating industrial site. Exposed pipes and gas wells are incompatible with the intended greenfield status and would interfere with planting, use of agricultural machinery, habitat creation and land management.

Additionally, the applicant states the approximately 500 wells may require an aftercare period of more than 60 years. Wellheads and a pipe network remaining visible in the landscape for 60 years is not consistent with the principle of full restoration to a greenfield site. MW.0039/15 planning condition 32, requires full restoration by 30th September 2036 which is consistent with the temporary five-year period of exposed pipework and gas wells, so they could be inspected and repaired as mentioned above.

Visual Impact

Condition 77 was also imposed to reduce visual impact. Without a clear, current plan of the proposed surface pipes and wells, their heights and appearance, and views of them from nearby homes, roads and Public Rights of Way the impact cannot be assessed.

Alternatives

The covering letter compares two extremes: putting everything underground or leaving the system on the surface without condition 77. Nothing in between is considered. The Parish Council believes a properly evidenced comparison of alternatives should be provided rather than what looks like the most convenient, and coincidentally cheapest, option for the applicant. In addition, no information is provided on what, if anything, has been agreed with the Environment Agency about the system’s design and maintenance. The applicant has not demonstrated that the need to manage gas and leachate justifies the site-wide removal of this key element of restoration.

Summary

Oxfordshire's current Minerals and Waste policies require satisfactory landfill restoration and consideration of landscape character, local amenity and visual intrusion. According to the information submitted, the Parish Council does not believe the County Council can properly assess the impact across the whole site and must reject this application. The Parish Council re-states its objection to this application.

Finally, the Parish Council hopes the Planning Officers will apply the same rationale to this s73, as they did to the s73 application submitted by FCC for an extension Waste Transfer Facility from 31st December 2030 to 31st December 2050 (MW.0167/23). The Officer's report to the Planning & Regulation Committee (on Monday 13th October 2025) was to recommend refusal because among other things 'the development would have unacceptable impacts on amenity including through visual and traffic impacts on the amenity of other users of the Rights of Way network and the permissive paths which are required to be provided in association with the restoration of the landfill site contrary to OMWCS policies C5, C10 and C11, VLP1 policy CP37 and VLP policy DP23. It has not been demonstrated that this greenfield site is the most suitable and sustainable option for a waste management facility after the completion of landfilling in 2030, and therefore the proposal is contrary to OMWCS policy W5.'

In this case the 'development' refers to exposed pipework and gas wells but the principles remain the same.

- 2026/139 Planning applications
- (a) Planning applications to be considered - continued
- P26/V4074/HH - 2 Tullis Close, Sutton Courtenay – No objections
 - P26/V3768/FUL - Hachette Uk Distribution Hely Hutchinson Centre, Plot A Signia Park – No objections
- (b) Members noted the additional planning correspondence and resolved to submit the following observations:
- P26/V3587/LDP Certificate of Lawfulness Proposed for Installation of cable route and substation works - Electrical Substation Purchas Road, Sutton Courtenay OX11 7BF to B4016 Appleford-on-Thames, OX14 4PQ – Noted
 - P26/V2091/HH Amendments to design - 5 Hobbyhorse Lane, Sutton Courtenay - No additional comment.
 - R3.0118/26 (HIF1) Condition 29 (Written Scheme of Archaeological Investigation in the A4130 widening and Didcot Science Bridge sections of the development (partial discharge)) of planning permission no. (R3.0025/26) – No objections.
 - MW.0094/26 Amended description "The application remains a s73 application to vary conditions 3 and 4 of Appeal Decision APP/U3100/A/13/2210015 (MW.0090/13) to extend the end date of the existing MRF facility from 31 December 2030 to 31 December 2039." – Noted.
 - P26/V0798/HH Amended extension design. Additional boundary wall detail provided - 17 The Green, Sutton Courtenay – Maintain the objection as no information has been provided to address our concerns regarding the adjacent Public Right of Way.

2026/139

Planning applications - continued

Members noted the following planning decisions:

P26/V1474/FUL - Hachette Uk Distribution Centre – WITHDRAWN

R3.0079/26 - (HIF1) - APPROVED

R3.0041/26 - (HIF1) - APPROVED

R3.0022/26 - (HIF1) - APPROVED

R3.0123/25 - (HIF1) - APPROVED

R3.0038/26 - (HIF1) - APPROVED

R3.0008/26 - (HIF1) - APPROVED

2026/140

Reports

(a) Parish Councillors

Members reported the following items:

- Cllr Dalby reported that the contractors, Graham, working on the HIF1 bridge across the Thames were currently building the bridge columns. The work including piling at significant depth, yet there was very little noise disturbance even close to the site.
- Cllr Atkinson reported that Cllr Sally Whiteman (Milton & Harwell Parish Councils, Vale of the White Horse District Council) had contacted her asking Sutton Courtenay Parish Council to join with 7 other parishes (including Milton and Harwell) in promoting a survey for residents to provide their opinions on the proposed reservoir (White Horse/SESRO), and to contribute £1,000 to the project. The detail had been received too late for the agenda. Members asked that the Clerk publishes the survey on its website and noticeboards; that Cllr Whiteman is advised of the discussion; and that the matter is included as an agenda item at the November meeting.

(b) Clerk

The Clerk reported that she had not yet had a response to the request for the notes from the HIF1 meeting held on 23rd July 2026. And that the defib cabinet should be removed from the phone box this week.

District & County Cllr Stevens joined the meeting at 8.24pm.

(c) County & District Councillor

Cllr Stevens reported on the recent fires at the FCC site, and that the Local Impact Report for the White Horse reservoir would be published in November.

Cllr Campbell asked would County Officers complete the Local Impact Report and would Officers interact with parishes. Cllr Stevens explained that they need to wait for the Thames Water documents, then the County and District Councils would work together. A hydrologist had been employed to provide technical detail to the Council.

Cllr Galliver would liaise with Cllr Stevens on the issues previously raised by the Parish Council, including the impact on water levels across the village during an emergency draw down from the reservoir, and any breaches.

- 2026/141 FCC landfill and composting facility
- Members noted that the emails to the District Council, and District Council & EA regarding application (P21/V26/82 & P26/V1357/RM) as agreed under 2026/126 had been sent. And that the remaining resolutions under 2026/126 would be clarified under this item.
- RESOLVED** that the Parish Council would write two formal letters of concern to the FCC directors (FCC Recycling UK Ltd and FCC Environment UK Ltd) to place their objections on the official record, including how community/environment impacts and appropriate standards of care and governance are being managed. While this is not a legal notice, it serves as a paper trail showing the directors were made aware of the community impact. **RA**
- RESOLVED** that the Parish Council would submit FOIs to the Environment Agency requesting data from 2015 to present to investigate trends, and to obtain information on the 2026 fire incidents. **RA**
- RESOLVED** that the Parish Council would contact both the Oxfordshire County Council, and the Vale of the White Horse District Council Waste teams to ask what their plans are after post 2030, when the Sutton Courtenay facility will be closed. **RA**
- RESOLVED** that the Parish Council would coordinate a Community Evidence Log by requesting the data from the 2026 incident reports from the Environment Agency and/or investigate helping residents compile "smell diaries" (noting dates, times, weather, and severity), with the intention to provide the EA and local authorities with the robust evidence required to take legal action. **RA**
- The Clerk confirmed a dedicated email address could be created for this purpose.
- RESOLVED** that once the Parish Council has collated the data it would request a meeting with the Environment Agency to review FCC's compliance history. **RA**
- RESOLVED** that the Parish Council would arrange a Sutton Courtenay public meeting, the date would be agreed at the November Parish Council meeting. **RA**
- RESOLVED** that the Parish Council would contact neighbouring parishes and ask if they would be interested in working together and encouraging data collection. **RA**
- RESOLVED** that the Parish Council would, if required, investigate costs to obtain independent specialist legal advice covering environmental permitting, statutory nuisance, private nuisance, public law, corporate/officer responsibility and Parish Council powers. **RA**
- With regard to the FCC liaison committee, the Parish Council would consider challenging the committee via Oxfordshire County Council's Scrutiny Committee, and that Members would consider boycotting future meetings.
- 2026/142 Recreation Ground
- (a) New cricket nets (S106 project)
- The nets had been completed and the S106 funds received.
- (b) Recreational Amenities Working Group
- Members noted the Recreational Amenities Working Group would meet before the November Council meeting. **Recreational Amenities WG**
- (c) Fortnightly checks
- Members noted the fortnightly checks report.

- 2026/143 Village Green vehicle barrier project (S106)
The Working Group had considered the 31 expressions of interest, and created a shortlist of 7. The 7 parties had been asked follow up questions. The Working Group would consider the responses and prepare a final shortlist for the November meeting.
Village Green WG
- 2026/144 Oxfordshire County Council Request for feedback on 20mph schemes
RESOLVED that the questions would be included in the newsletter and residents asked to submit responses to the Clerk. The Clerk would then collate the responses and submit them to OCC.
Clerk
- 2026/145 Oxfordshire County Council bus survey OxBus2040
The Clerk had prepared some answers to the questionnaire.
RESOLVED that the subjective questions would be included in the newsletter and residents asked to submit responses to the Clerk. The Clerk would then collate the responses and submit them to OCC.
Clerk
- 2026/146 Joint Local Plan
(a) Joint Local Plan 2045 (JLP2) Scoping Consultation
Members noted that no response had been submitted.
(b) Joint Local Plan Regulation 19 consultation hearing
RESOLVED that a submission would be made to champion the green gaps identified in the Sutton Courtenay Neighbourhood Plan.
A previous submission had been prepared for the JLP1 which would be revised.
Clerk
- 2026/147 Finance
(a) Internal Control Checks for Q1
Cllr Raworth had started the Internal Control Checks for Q1
HR

2026/147 Finance - continued

(b) Receipts and Payments report

RESOLVED that the following payments would be authorised:

Receipts

Voucher	Name	Description	Amount	Totals
18	Vale of White Horse DC	Precept	54,000.00	
19	Public Sector Deposit Fund	Interest	250.70	
20	Vale of White Horse DC	S106 funding	18,074.96	
21	Sandra Homewood Group Ltd	Cemetery fees	150.00	
22	Abingdon Stone & Marble Ltd	Cemetery fees	125.00	
23	SSEN	Wayleaves	12.00	
.	.	.	.	72,612.66

Payments

Voucher	Method	Name	Description	Invoice	Amount	Totals
116	DIRDEBIT	Unity Trust Bank	Bank fee	bank fee	9.25	
117	CARD	Lloyds	Bank fee	bank fee	3.00	
118	ONLINE	Gallagher	Insurance	560286698	2,874.98	
119	ONLINE	Slatter Cricket & Play	Cricket nets	CP8749	45,888.00	
120	CARD	Royal Mail	Postage	card	4.55	
121	ONLINE	RoSPA Play Safety Ltd	Inspection	101740	627.60	
122	ONLINE	Shield Maintenance Ltd	Waste collection	10817	213.20	
123	CARD	Royal Mail	Postage	card	0.91	
124	DIRDEBIT	EE	Phone	V02513075208	16.20	
125	DIRDEBIT	Ashdown Phillips and Partners Ltd	Office licence	324629	748.48	
126	ONLINE	Tactical Facilities Management Ltd	Grounds maintenance	899	1,454.54	
127	CARD	Royal Mail	Postage	card	1.82	
128	ONLINE	Royal British Legion	Poppy Appeal	RBL - Abingdon	31.50	
129-32	STORDER	Officers, HMRC, Pension	Staff costs	Month 7 salary	4,434.43	
133	ONLINE	Water Resource Associates LLP	Planning advice	1594	720.00	
						57,028.46

(c) Councillors to authorise payments

RESOLVED that Cllrs Atkinson and Dalby would authorise payments online.

RA & RD

(d) Budget and reserves reports

Members noted the reports.

2026/148 Staff Committee Minutes

RESOLVED that the minutes from the Staff Committee meetings held on 3rd February and 1st September 2026 would be adopted.

2026/149 Casual Vacancies

Members noted that one vacancy remained.

Close of meeting

The next meeting of the Council would be held on Tuesday 3rd November 2026.
There being no further business the Chairman declared the meeting closed at 9.22pm.

Signed

Dated

Sutton Courtenay Parish Council Formal Objection

Date: 6th October 2026

Ref: P26/V1357/RM

Proposal: Reserved Matters Application following outline planning permission P21/V2682/O Residential development of up to 175 dwellings (outline planning application with all matters reserved except means of access to the site from Frilsham Street) and associated works.

Approval of outline Planning Conditions 4, 5, 9, 12, 13, 14, 15 and 25

Discharge of Obligation 2.2 of Schedule 1 of the S106

Sutton Courtenay Parish Council has carefully considered the amended application and revised drainage and landscaping documentation and sets out its response to the following:

Discharge of Condition 5 – for reasons set out in document “P26-V1357-RM Condition-5 Sutton Courtenay PC Objection” the Parish Council asks that this condition is not discharged till the questions set out in the said document are resolved and hence objects.

Discharge of Condition 9 - – for reasons set out in “P26-V1357-RM Condition-9 Sutton Courtenay PC Objection with Appendices” the Parish Council asks that this condition is not discharged till the questions set out in the said are resolved and hence objects.

S106 - In this cover letter Sutton Courtenay Parish Council also expresses its concerns with regards to the inadequacy of the 2023 S106 agreement to make provision for the long-term maintenance of the site given the complexities of the site. In the long-term the residents will have an escalating service charge levied on them, by the Management Company, due to the vulnerabilities of items that would require maintenance. These include

- Landfill Contamination & Maintenance (The Vent Trench)
- Public Open Space (POS) and Sustainable Urban Drainage Systems (SuDS)
- Play equipment
- The trees and general planting on the site

Additionally, the Section 106 requires a designated management body to look after the land. Under Condition 5, that body must commit to maintaining these spaces precisely to ecological specifications for a minimum of 30 years. Standard mowing or landscaping is not permitted in BNG zones; it requires specialist conservation maintenance to ensure the habitats do not degrade.

The revised Surface Water Drainage Scheme now proposes a pumped system, introducing long-term maintenance, replacement, and failure-risk obligations that were not contemplated in the 2023 Section 106 Agreement. Planning conditions cannot secure funding, maintenance, or emergency response arrangements for mechanical drainage infrastructure.

Given this material change, the Parish Council formally requests that Vale of White Horse District Council undertakes a review of the 2023 Section 106 Agreement to ensure that the

open space and long-term drainage infrastructure responsibilities, costs, and liabilities are properly secured.

Layout: The proximity of the play area to the one of the balancing ponds is of some concern and the Parish Council would wish to see measures to prevent young children from falling in. It is also of concern that it has been located in a corner of the site that is prone to flooding.

Finally, once full planning consent is given, the developer may decide to sell off part of the development land, by applying for a Section 73 application to phase the development. Protections should be assured for residents of the occupied houses and the future occupants of the yet to be built houses.

Sutton Courtenay Parish Council
Formal Objection – Discharge of Condition 5

Date: 6th October 2026

Ref: P26/V1357/RM

Proposal: Reserved Matters Application following outline planning permission P21/V2682/O Residential development of up to 175 dwellings (outline planning application with all matters reserved except means of access to the site from Frilsham Street) and associated works.

Approval of outline Planning Conditions 4, 5, 9, 12, 13, 14, 15 and 25

Discharge of Obligation 2.2 of Schedule 1 of the S106

Sutton Courtenay Parish Council objects to the discharge of Condition 5 at this stage for the following reasons:

1. Conflict Between Flood Engineering Requirements and Habitat Quality

The applicant has not adequately demonstrated that habitats which are required to perform operational flood storage and drainage functions can realistically achieve and maintain the ecological condition assumptions relied upon within the biodiversity metric calculations.

The attenuation ponds and associated SuDS infrastructure will inevitably require ongoing engineering intervention, including vegetation clearance, sediment removal, drainage maintenance and access for operational purposes. The submitted BEP does not demonstrate how these engineering requirements are compatible with achieving and sustaining 'good condition' ecological habitats over the long term.

The submitted CEMP:B further reinforces the extent of engineering intervention required across the site. The document refers to temporary bunds, silt fencing, settling tanks, separators, impermeable chemical storage areas, runoff controls and emergency flood procedures during construction. The Parish Council considers that these extensive engineered interventions further support concerns that the attenuation and ecological areas are fundamentally operational drainage infrastructure rather than naturally functioning habitats.

Sutton Courtenay Parish Council has previously registered its concerns that some of the planning conditions are interrelated and should be assessed holistically. The impact of measures drainage identified to discharge Condition 9 should be included as part of the assessment of this Condition 5.

2. Extent of Impermeable Surfaces Across the Site

The Impermeable Areas Plan raises further concerns regarding the overall ecological performance of the development. The submitted drawings confirm that approximately

46.23% of the site will comprise impermeable surfacing, including roads, driveways, building footprints and associated hardstanding, with only 53.77% identified as permeable areas.

The extensive impermeable surfacing is being introduced in response to acknowledged groundwater and surface water flood constraints affecting the site. This appears to involve significant artificial modification of the natural hydrology of the site through sealed surfaces, attenuation basins and engineered drainage infrastructure.

The Council is concerned that the submitted biodiversity enhancement proposals do not adequately assess the cumulative ecological consequences of these extensive impermeable surfaces or demonstrate how habitat quality will be maintained adjacent to heavily engineered drainage infrastructure.

3. Hydrological Compatibility of Proposed Habitats

The applicant has not demonstrated that the proposed habitat types are hydrologically compatible with the flood regime identified within the hydraulic modelling documentation.

The submitted plans indicate that the attenuation areas and surrounding ecological spaces will be subject to fluctuating water levels and periodic inundation. However, the BEP does not appear to include detailed hydro-ecological assessment demonstrating that the proposed grassland and SuDS habitats can reliably establish and remain in 'good condition' under those conditions over the lifetime of the development.

The submitted CEMP:B also confirms that flood warnings and emergency procedures will need to be actively monitored during the construction phase. This further demonstrates the hydrological sensitivity and complexity of the site and reinforces concerns regarding the long-term ecological resilience of the proposed habitats.

4. Fragmentation of Ecological Areas

The Biodiversity Protection Zone plan within the submitted CEMP:B indicates that the majority of ecological protection measures are concentrated within narrow boundary corridors and peripheral retained landscape strips, whilst most of the site is comprehensively urbanised through housing, roads and associated infrastructure.

This will result in ecological functionality being heavily compressed into engineered attenuation areas and fragmented peripheral corridors. The submission does not adequately demonstrate that these fragmented areas will collectively operate as resilient and sustainable ecological habitats capable of delivering the claimed biodiversity net gain over the long term.

5. Biodiversity Metric and Ecological Evidence

The biodiversity metric assumptions and supporting ecological evidence are not robust.

The submitted documentation refers to revisions to ecological baselines and updated walkover surveys undertaken in 2024 and 2025. However, detailed updated ecological survey evidence supporting the biodiversity metric calculations does not appear to have been provided in full.

Sufficient evidence has not been provided to demonstrate that the claimed biodiversity net gain can realistically be achieved and maintained, particularly given the reliance upon engineered drainage infrastructure and habitats assumed to achieve 'good condition' status.

6. Long-Term Management and Monitoring

Insufficient information has been provided regarding the long-term ecological management and monitoring of these engineered ecological areas.

In particular, the submission does not clearly identify:

- who will be responsible for long-term ecological management;
- how ongoing management and maintenance will be funded;
- what ecological monitoring regime will apply;
- what remedial measures will be implemented if habitats fail to establish;
- or how ecological success criteria will be assessed and enforced over time.

Given that much of the claimed biodiversity uplift appears dependent upon the successful operation and ecological performance of engineered flood attenuation areas, these omissions are significant.

7. Request to the Local Planning Authority

For the reasons set out above, Sutton Courtenay Parish Council respectfully requests that Vale of White Horse District Council does not discharge Condition 5 at this stage.

If the council is minded to discharge condition 5, then we respectfully suggest the developer provides the following:

- detailed justification for the habitat condition assumptions used within the biodiversity metric;
- evidence demonstrating compatibility between the flood attenuation function and ecological objectives;
- hydro-ecological assessment of the attenuation areas;
- full biodiversity metric calculations and supporting ecological evidence;
- detailed long-term ecological management and monitoring proposals;
- and further clarification regarding the long-term ecological implications of the extensive impermeable surfacing proposed across the site.

Sutton Courtenay Parish Council
Supplemental representation to Objection to Discharge of Condition 9
Sustainable Drainage Scheme

Date: 6th October 2026

Ref: P26/V1357/RM

Proposal: Reserved Matters Application following outline planning permission P21/V2682/O
Residential development of up to 175 dwellings (outline planning application with all matters reserved except means of access to the site from Frilsham Street) and associated works.

Approval of outline Planning Conditions 4, 5, 9, 12, 13, 14, 15 and 25

Discharge of Obligation 2.2 of Schedule 1 of the S106

Sutton Courtenay Parish Council submits this supplementary representation following notification of the amended application and revised drainage documentation. **The Parish Council maintains its previous objection to the discharge of Condition 9 and 12 and maintains that the two conditions should be considered together. The assessment of the discharge of Condition 9 should also include the impact of the identified drainage measures on Condition 5 the Biodiversity Enhancement Plan.** In Detail:

1. Use of out of date and invalid topographical data

The original Stantec Flood Risk Assessment relied on older topographical information, including a 2014 survey baseline. Since then, surrounding landfill landforms and FCC Phase 4 works have materially changed the local topography, drainage catchments and surface water pathways. Specifically, the filling and capping of the landfill cells immediately next to the eastern boundary of the site have created a significant raised area with runoff directed towards the application site. This is a significant material change not reflected in the modelling. The site is already acknowledged as high risk given the proposed raised levels and attenuation scheme and it is perverse the increased risk from altered topography is not considered.

The Parish Council recognises that Condition 9 requires the scheme to be based on the May 2021 Stantec Flood Risk Assessment. However, Condition 9 also requires the scheme to be based on sustainable drainage principles and an assessment of the hydrological and hydrogeological context of the development. That wider wording means the applicant must demonstrate that the detailed drainage scheme remains robust in the present-day site context, not merely that it refers back to the 2021 FRA.

The Parish Council therefore maintains that the applicant should either provide a current topographical survey or a clear technical addendum explaining why one is unnecessary, what updated data has been used and what sensitivity testing has been undertaken.

2. Insufficient testing of sub-soil structure

The site is located above a stratum consisting of impermeable Gault Clay. Boreholes and other testing to date have not been to the depth of the Gault Clay. This means the behaviour of, and movement of the groundwater once it reaches this layer is unknown. This factor has not been

considered in the modelling which must therefore be incomplete and prone to error. Please refer to Appendix 1, which contains a note to the Parish Council from exploration geologist, Jonathan Hunt of Minotaur Synergies for further details.

3. Lack of Finished Levels and Freeboard Demonstration

The revised Stantec submission fails to provide finished ground levels, infiltration feature base levels and freeboard calculations. Without these, the applicant has not demonstrated the required 1 m unsaturated zone needed between infiltration surfaces and maximum groundwater levels. This is a crucial compliance requirement to fulfil Condition 9, which has not been met.

4. Stantec's amended response should be independently assessed

The Parish Council notes that the amended submission includes a response to Water Resources Associates'(WRA) observations. The Parish Council asks that the Local Planning Authority does not treat that response as determinative without clear written advice from the Lead Local Flood Authority (LLFA) and any other relevant technical consultee. Please refer to Appendix 2 which contains a note from Russell Harman of Datom Engineering, setting out the concern in more detail.

The Parish Council asks that the technical consultee response expressly addresses each outstanding issue raised in the Parish Council's previous objection, including groundwater behaviour, infiltration reliability, final levels, land raising, exceedance routing, present-day topography, basin construction, off-site outfalls and long-term maintenance.

The Parish Council notes with disappointment that the applicants hired consultants responded to our previous objection and our expert WRA report without the professional courtesy due to a fellow highly qualified expert.

We also note that the LLFA has conditioned the application to ensure the level of detail is provided for technical assessment. The LLFA will await this detail to be submitted and will comment further at that stage.

5. Maintenance, ownership and enforceability

Given the high risk of flooding, as clearly acknowledged by the numerous countermeasures proposed, it is essential that the long-term maintenance of all measures, and associated funding, is clearly understood. All measures degrade in time and there are the ever present threats from climate change. The Parish Council is concerned to ensure when things go wrong the public purse will not be expected to pick up the pieces nor the residents have to foot the expensive bill. Some financial accountability by the developer has to be built in to the s106 agreement.

The Parish Council maintains its concern that long-term SuDS performance cannot be assessed only by reference to inspection frequencies. The applicant should identify who will own, fund, inspect, maintain and repair each drainage asset for the lifetime of the development.

The applicant is proposing a permanent pumped solution for foul water but provides no information on who would be responsible for operation, maintenance and funding going forward.

6. WRA Response

Sutton Courtenay Parish Council attaches Water Resource Associates Technical Note 2 (October 2026) at Appendix 3. It was commissioned to review the revised drainage design submitted by Stantec/RSK in August 2026. This independent technical review provides new and material evidence

demonstrating that the revised Surface Water Drainage Scheme (SWDS) remains non-compliant with Condition 9 and does not resolve the concerns previously raised by the Parish Council.

In brief the WRA response states:

WRA1. Removal of Evidence of Existing Flooding

WRA identifies that Stantec/RSK have **removed photographs** from the revised SWDS which previously showed **waterlogging and ponding** on the site. These images demonstrated existing poor drainage conditions.

The removal of this evidence raises concerns about the reliability and transparency of the revised submission and materially undermines confidence in the applicant's assessment of baseline conditions.

WRA2. Continued Reliance on Pumping for Surface Water

WRA confirms that the revised design requires **pumping of runoff from approximately 66% of the developed area** back to the northern infiltration basin. Pumped drainage systems are normally used only as a **last-resort retrofit**, not as a design choice for new development.

This reinforces the Parish Council's concern that the proposed scheme is **not a sustainable SuDS system**, introduces significant **maintenance and failure risks**, and would likely impose long-term costs on residents or the public purse.

WRA3. Ground Raising Remains Substantial and Unresolved

The revised SWDS continues to rely on **significant ground raising**, particularly around the northern infiltration basin, which lies in low-lying ground with seasonally high groundwater levels.

WRA confirms that the extent of ground raising remains substantial and that the design still lacks essential detail on the construction, stability, and long-term performance of the raised filter media. This supports the Parish Council's position that **Condition 12 (levels) and Condition 9 (drainage) cannot be assessed separately**.

WRA4. Incorrect Assumption of Homogeneous Ground Conditions

WRA identifies a major flaw in the revised SWDS: Stantec/RSK assume the ground is homogeneous, despite the presence of a **shallow sandy-clay horizon** across the Sutton Courtenay area with **much lower permeability** than deeper sand and gravel.

This layer will receive infiltration from permeable paving and is highly susceptible to **construction-related compaction**, further reducing infiltration capacity. This confirms that the infiltration strategy is **not supported by a robust hydrogeological model**.

WRA5. Inadequate Groundwater Data and Underestimation of Flooding Risk

WRA notes that Stantec/RSK continue to rely on **only one winter period (2020–21)** of groundwater monitoring. A longer dataset would likely show **groundwater flooding** in the northeast and southwest sectors of the site.

The revised SWDS also fails to assess **climate-change groundwater levels**, meaning the applicant has not demonstrated long-term compliance with Condition 9.

WRA6. Freeboard Requirement Still Not Met

WRA provides new evidence that the northern infiltration basin achieves only **approximately 0.5 m freeboard**, compared with the **required 1 m**.

This is a **critical failure** under Condition 9. The infiltration basin remains non-compliant and cannot be approved without redesign.

WRA7. Inconsistent and Unsupported Infiltration Rates

WRA identifies inconsistencies between infiltration rates reported in the text (32 mm/hr) and those shown on drawings (35.8 mm/hr). Both values appear to be derived from **trial pit SA102**, representing **local in-situ materials**, not engineered fill.

No infiltration testing has been undertaken at the **formation depth** of the proposed infiltration basin. This confirms that infiltration performance is **unproven**.

WRA8. Lack of Construction Detail for Critical SuDS Features

WRA notes that the revised SWDS still provides **no construction detail** for:

- the raised filter media blanket
- embankment stability
- compaction specification
- groundwater control
- long-term maintenance requirements

These omissions mean the infiltration basin cannot be assessed for structural integrity or long-term performance.

Thus Water Resource Associates Technical Note 2 provides **new, independent, and authoritative evidence** that the revised Stantec/RSK drainage design remains **fundamentally flawed, non-compliant, and incomplete**. The Parish Council's previous objections are not only upheld but materially strengthened.

The Parish Council therefore reiterates its objection to the discharge of Condition 9 and requests that the Local Planning Authority:

1. Treat WRA Technical Note 2 as a material technical submission.
2. Require the applicant to address each of the failures identified above.
3. Seek a formal written response from the Lead Local Flood Authority on the revised SWDS and WRA's findings.
4. Decline to discharge Condition 9 until a compliant, evidence-based, and sustainable drainage strategy is provided.

For all the reasons set out above, the Parish Council reiterates its objection to the discharge of Condition 9. :

Additionally, the Water Resource Associates Technical Note 2 provides new, independent, and authoritative evidence that the revised Stantec/RSK drainage design remains fundamentally flawed, non compliant, and incomplete. The Parish Council's previous objections are not only upheld but materially strengthened.

The Parish Council therefore maintains, and now further strengthens, its objection to the discharge of Condition 9.

Conclusion

The amended drainage material should not be treated as resolving the Parish Council's previous objection. In particular, the Parish Council considers that Conditions 9 and 12 should be assessed together because final levels, land raising, groundwater clearance and exceedance routing are central to the drainage strategy.

As stated above Sutton Courtenay Parish Council believes the current modelling is inaccurate and does not represent the current topology or ground conditions and is therefore not valid and thus maintains its objection to the discharge of Condition 9.

However, should the LPA be minded to permit discharge of Conditions 9 the Parish Council respectfully requests that the applicant provides the following information, or the Local Planning Authority and Lead Local Flood Authority provide a clear written explanation as to why it is not required:

1. A schedule identifying all changes made to the drainage strategy, drainage drawings, flood conveyance plan, levels information and SuDS maintenance proposals since the previous submission.
2. A written response from the Lead Local Flood Authority addressing Stantec's amended drainage response, Water Resources Associates' and Minotaurs' observations.
3. A clear explanation of how the Condition 12 levels information has been incorporated into the Condition 9 drainage strategy, hydraulic modelling and exceedance assessment.
4. A final levels and groundwater clearance schedule for each infiltration feature, confirming finished levels, feature base levels, groundwater levels relied upon and achieved unsaturated clearance.
5. A current topographical survey, or a clear technical justification explaining why one is not required, together with an addendum explaining how present-day topography, completed landfill landforms, FCC Phase 4 works and current overland flow paths have been reflected in the assessment.
6. A fuller exceedance routing note addressing blockage, exceedance, partial failure and construction-stage conditions, including potential effects on Hobbyhorse Lane, Frilsham Street, neighbouring residential land, allotments and the Village Hall.
7. Confirmation that any amendments to basin design, liners, membranes, fill material, outfalls and flow controls have final technical specification and appropriate specialist sign-off.
8. Evidence of legal rights, consents, adoption arrangements and long-term responsibilities for any outfall to off-site ditches, watercourses or drainage infrastructure within highway land.
9. A complete updated SuDS maintenance, ownership and funding plan identifying the party responsible for each drainage asset for the lifetime of the development.

10. Finally, the applicant should expressly confirm that the amended drainage and levels proposals will not increase flood risk to Hobbyhorse Lane, Frilsham Street, neighbouring residential properties, allotments, the Village Hall or adjoining land.

Encl:

Appendix 1 Jonathan Hunt of Minotaur Synergies Technical Note on Geology data used in modelling
September 2026

Appendix 2 Russell Harman, DATOM Engineering Limited, Integrated Review of Technical Evidence,
September 2026

Appendix 3 Water Research Associates Technical Note 2 Further Review, October 2026



Concerns relating to Planning Application P26/V/1357/RM: Condition 9

Dear Parish Council,

I wish to express my concerns relating to condition 9: approval of a suitable drainage scheme.

My main concerns revolve around what, in my view, is an incomplete assessment of the geology of the site and, that this incomplete assessment, could adversely affect water levels, drainage/permeability of the bedrock and their cumulative effect on flooding and subsequent impact on the adjacent footpaths and how these will be mitigated by the attenuation ponds and overflow runoff solutions.

Flood Risk Assessment Report (Stantec Project reference: 46720/4005)

Two of the stated aims of this report are to address the Vale of White horse district council local plan 2031 which states amongst others that the risk and impact of flooding will be minimized through:

- Ensuring that the development does not increase the risk of flooding elsewhere
- Ensuring that all new development addresses the effective management of all sources of flood risk

Although the Stantec flood risk assessment report has been approved and accepted, I am concerned that because not all of the available data has been utilised and that the some of the test pits and drilling data is not represented in its correct geographical position this then has resulted in an inadequate Flood risk assessment and subsequent infiltration and permeability computerised modelling upon which the Surface drainage strategy report is formulated.

When this is coupled with the fact that the footpath to the east of the site and the drainage ditch already floods during winter, gives me great concern that this development could in fact adversely affect the flood risk proximal to the development and detrimentally affect third parties.

Geology

The flood risk assessment details that the development site is underlain by the Northmoor sand and gravel member and that the bedrock is the Gault formation. The British Geological

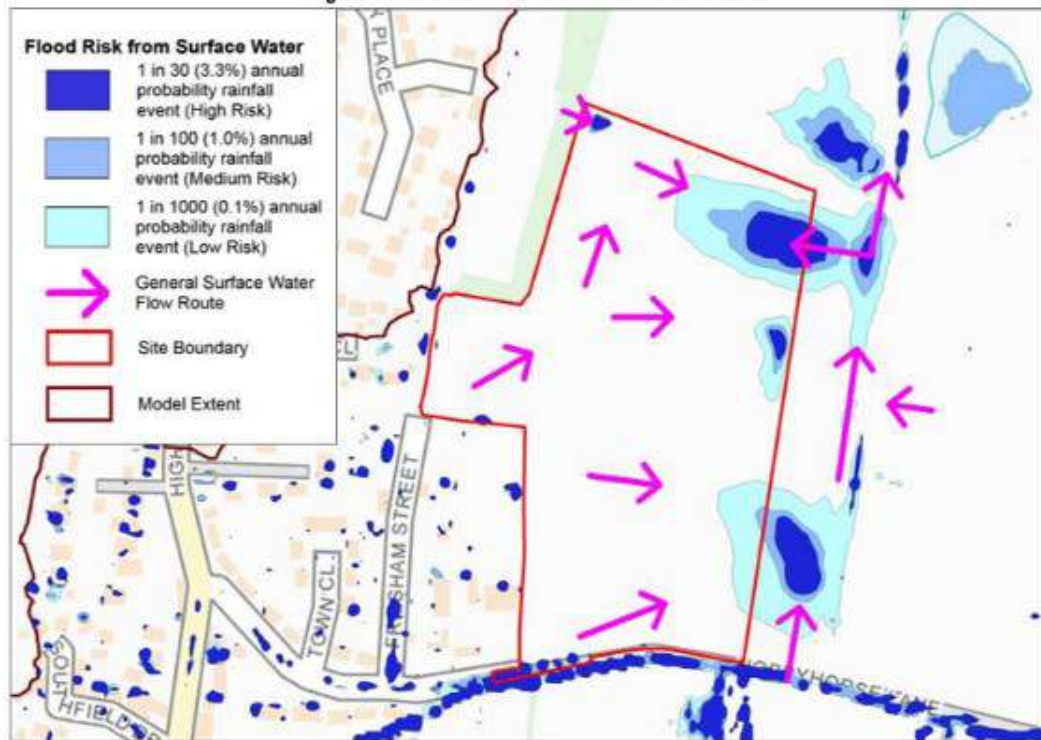
Teams: jhunt@minotaur-synergies.co.uk

Mobile: +44(0) 74 508 608 17



survey has produced a report on the Gault formation: Technical Report: WN/94/31 - Engineering geology of British rocks and soils. This report details that the two main clay minerals are Kaolinite-illite and smectite-illite, all three of these clay minerals exhibit high swelling, low hydraulic conductivity and low permeability. The statement that the Cranfield University's soilscape viewer indicates that the soils are freely draining, only applies to the superficial Northmoor member and does not take into account the hydrogeological characteristics of the underlying Gault formation and in my view does not holistically quantify the permeability / drainage characteristics of the development site i.e. the surface water will drain laterally and vertically until it encounters the impermeable / low hydraulic conductive Gault clay formation at which point it will migrate along the Northmoor member and gault formation interface i.e. downhill towards the east of the site and this then results in flooding as shown by the map below.

Figure 3.7: Extract of Stantec Pluvial Model Extents



The modified /enhanced flood risk assessment map produced by Stantec, while a significant improvement on the original maps only represents what is becoming the normal runoff and ponding for this area and in my view does not sufficiently represent outlier events, i.e. the 1:30, 1:100 and 1:1000 year events. Anyone who lives in the village and walks around this area knows that during winter the eastern edge of the field regularly floods and spills over the footpath to the east.

Teams: jhunt@minotaur-synergies.co.uk

Mobile: +44(0) 74 508 608 17



DATA

Few, if any of the recent test pits / drilling logs presented encounter the Gault formation. The consultant has omitted to use the 1977 data produced by ARC, and the WRA report highlights the missing and incorrect data. This gives me great concern that the hydrogeological modelling is at best incomplete and at worst inaccurate.

In my professional capacity as an exploration geologist, I have been involved in building three-dimensional geological models and at the risk of stating the obvious the best three dimensional scientific models come from modelling with comprehensive data and accuracy is paramount. The aim of any computerised model is to accurately represent and explain all of the available data. In the economic geology sciences there are many checks and balances and third party reviews involved, including examining the variability of the data which is then used to classify the accuracy of any computer model estimates. This is all needed before being allowed into the public domain or to raise funds.

I therefore cannot overstate the importance of including all data in any computer modelling exercise and the fact that key information has been omitted is a real concern to me and in my view, casts serious doubt on the completeness of the risk assessment and mitigation measures.

Kind regards

Jonathan Hunt (FGS, MAIG, Pr.Sci.Nat)

Director: Minotaur Synergies Ltd

Please note that although the author is not a specialised geohydrologist or civil engineer he does have over 30 years of geological experience in the Economic geology sciences.



Datom Engineering Ltd

67F High Street
Sutton Courtenay
Abingdon
Oxfordshire
OX14 4AT

Tel: 01491 573153
Mob: 07816 515754

russell.harman@datomeng.co.uk

Date: 17th September 2026

Dear Councillors,

PROFESSIONAL ADVISORY NOTE

Hobby Horse Lane – P26/V1357/RM

Surface Water Drainage and Associated Reserved Matters

To: Sutton Courtenay Parish Council

Datom Engineering has undertaken a comprehensive review of the submitted surface water and foul drainage schemes.

It is worrying that the developer has assumed the evidence, documentation and test methods discussed/presented at the inquiry as being correct and engineeringly sound, notwithstanding the SoS's direction that specifies the documents are to be used.

Here are the key findings:

1. **Flood Risk Modelling:** The whole flood risk model used by Stantec is fundamentally flawed. The latest Flood Risk Model published by the Government in 2026 uses an Ordinance Survey Map which has not been updated for decades. The OS Map information used does not reflect the significant changes to the local landscape as a result of landfill operations at HHL North, HHL South, Sutton Courtenay 90 Acre Field and Phase 4. To make matters worse, the landfill sites are covered with an impermeable layer to prevent rain water from entering the landfill and the generation of leachate which could enter the underground water courses. Any rain water that falls onto the landfill areas will, in principle, flow off into an area such as HHL Development site, where it can naturally disperse. The HHL Development will



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create further significant restrictions for water to dissipate which has to go somewhere. Stantec's report even questions this and assumes that the North Basin will be able to hold and naturally disperse any flood waters. It also assumes that surface water can flow into HHL Brook at 2.5l/s. The Drainage Scheme does not consider that HHL regularly floods and with the introduction of 2.5l/s will add to the flooding along HHL.

In addition to the sting of flawed assumptions, Harper Crewe has incorrectly assumed that the previous historic soak away tests demonstrated the behaviour of the sand and gravel is sufficient. What has not been demonstrated is the behaviour of the underlying Gault Clay upon which the proposed infiltration system ultimately depends.

Conclusion: there is a significant string of sequential assumptions: assumed OS topology, assumed officially Government 2026 published flood risk data, assumed 1:100 event, assumed continuous function of a surface water pumping station, assumed soak away capabilities, assumed no requirement for soak away recovery, assumed that ongoing maintenance of the system will be undertaken. For these reasons, Datom Engineering consider this to be a high risk development which should not be permitted to proceed.

What is more worrying is that I suspect that Stantec used the same flawed flood risk information methodology for the HIF and surrounding housing developments in Didcot. [eg Nobel Park]

2. **Foul Water:** The Foul Water Pumped system with a rising main into Thames Water Manhole 1201 is a major concern. It is not clear how the existing sewage system is to adequately accept a discharge of 8.1l/s of foul water into the Frilsham Street/Hobbyhorse Lane sewage drainage system. In the technical submission by Harper Crewe, I would expect there to be Functional Specification which considers the downstream system beyond the limits of Manhole 1201 and how the foul water can be safely discharged into the main sewer which runs along the Sutton Courtenay High Street. It should go further to ensure that Thames Water infrastructure can cope with the additional demand all the way to the Treatment Works.

There is anecdotal evidence of the sewage system failing along Frilsham Street resulting in sewage spills. Should there be a blockage in Frilsham Street due to tree roots or collapse of the sewer by Heavy Construction Plant, there is a high risk there will be future sewage spills along HHL and Frilsham Street.



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Conclusion: To “assume” that it is Thames Water’s responsibility after Manhole 1201 is a high risk approach and should be challenged.

3. **Integrated Solution:** For both the Foul and Surface Water Pumping Solutions, an Integrated System Functional Specification should have been included within the submission to demonstrate how both these system will remain in operation during high rain fall/high risk scenarios. This should include a new HV Substation complete with dual A & B HV supplies from differing upstream SSE Substations.

Conclusion: If both HV supplies fail, there should be sufficient capacity for both the Foul and Surface Water holding tanks/basins for a suitable period (circa 4-8hours min). This risk mitigation information and engineering detail is not shown in the current submission.

4. **Sustainable Drainage Solution:** It is Datom Engineering’s opinion that the engineered Foul and Surface Water systems have been “back fitted” to support the approved planning application for 175 dwellings.

Conclusion: This cannot be considered a “Sustainable Solution” since it requires mechanical and electrical systems intervention. Datom Engineering has undertaken a study which has concluded that the development site cannot be supported without any mechanical and electrical system intervention even with a revised planning application reducing the number of dwellings. Our assessment concludes that the limiting factor is the sewage system, which will always need to be pumped, with all the necessary mechanical and electrical systems, and ongoing maintenance costs. Whilst it is acceptable to use mechanical and electrical systems in specific instances, it does raise the development site viability question.

5. **Biodiversity & Environmental Impact:** If Harper Crewe is permitted to proceed without demonstrating the capacity and resilience of the existing downstream sewage system, there remains a risk of sewage surcharge or spillage within Hobby Horse Lane and/or Frilsham Street. The Foul Water Pumping Station could continue discharging into an already compromised downstream system until stopped by control, alarm or human intervention. Any resulting sewage spill could enter the local drainage environment, including HHL Brook, with a consequential impact on water quality, wildlife and biodiversity.



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There is also an inherent conflict between the proposed attenuation/infiltration basins as engineered drainage assets and their potential biodiversity function. These basins will require ongoing inspection and maintenance to preserve their hydraulic capacity and effectiveness. This may require vegetation management, sediment removal, access by maintenance personnel or plant, and potentially more significant intervention if infiltration performance deteriorates. Any wildlife habitat which becomes established within these basins must therefore remain secondary to their primary drainage function. The Biodiversity and Environmental Management proposals should recognise and assess this long-term operational conflict rather than assuming that the drainage features will remain undisturbed ecological habitats.

Conclusion: Neither document adequately addresses these foreseeable operational risks, nor the potential conflict between maintaining the drainage infrastructure and protecting the biodiversity that may become established within it.

6. **Future Homeowner Costs and Infrastructure Liabilities:** The Applicant should identify who will ultimately own, operate and pay for the permanent drainage infrastructure required by the development, including the foul and surface-water pumping stations, electricity, 24/7 monitoring, maintenance, replacement and ongoing maintenance of the SuDS basins.

Conclusion: Where these assets are not adopted by Thames Water or another statutory body, the Applicant should clearly identify what ongoing costs and liabilities will ultimately fall upon future homeowners through management or service charges.



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FINAL CONCLUSION

The Applicant has not demonstrated that the proposed 175-dwelling development is a complete, coordinated, sustainable and resilient engineered solution based upon verified factual evidence. The development remains dependent upon engineered ground conditions, unproven infiltration performance at final formation level, permanent surface-water and foul-water pumping, third-party wastewater capacity and resilient electrical infrastructure. These are fundamental engineering dependencies, not matters of construction detail.

The SuDS scheme cannot be considered or discharged in isolation. It drives the ground levels, earthworks and construction traffic, with direct consequences for the CEMP, Biodiversity Enhancement Plan, CTMP and Arboricultural proposals. These interdependent conditions must be demonstrated together as one coordinated engineered solution. Until that complete engineering solution is demonstrated, Datom Engineering considers the proposed development to represent an unacceptable engineering risk to the existing community and environment.

Yours Sincerely



Russell Harman CEng MCIBSE

Director

For & on behalf of DATOM Eng Limited

Surface Water Drainage Strategy for Proposed Development off Hobbyhorse Lane, Sutton Courtenay, Oxfordshire

This note has been prepared in response to a request on 27th September 2026 by Sutton Courtenay Parish Council [SCPC] to review the revised drainage design submitted by Stantec dated August 2026, in relation to the following planning application:

P26/V1357/RM Reserved Matters, Application following outline planning permission P21/V26/82/O Residential development of up to 175 dwellings and associated works.

The revised design was produced by LDE Consultants [part of the RSK Group] and submitted to the planning authority in electronic file: Surface Water Strategy Report_331510148 SWDS/001 Rev D.pdf, together with the following drainage drawings:

- 891297-RSK-ZZ-XX-DR-C-0001-P06
- 891297-RSK-ZZ-XX-DR-C-003-P05
- 891297-RSK-ZZ-XX-DR-C-0004-P02
- 891297-RSK-ZZ-XX-DR-C-0005-P02

Much of the original Stantec report has been reproduced without change, so it is important for the reader of this note to consult WRA's critique dated 6th July 2026, which remains relevant.

It is worth noting that the **drainage design parameters have changed** and some photographs showing waterlogging and ponding on the site have been removed [Stantec Figures 3.3 and 3.4 of the original report]. Clearly, these photographs demonstrate existing poor drainage on the site.

The drainage network has been simulated again using Causeway drainage software, rather than InfoDrainage used in the previous report. There have also been no obvious changes to the road and housing layout on site, evident by comparing the original Appendix H and the new RSK drawings.

Changes in design parameters include an increase in the runoff coefficient to 1.0 and differences in the runoff basin **storage volumes**:

- Infiltration Basin North 977 m³ reduced from 1782 m³ and infiltration rate of 0.032m/hr.
- Attenuation Basin South 2706 m³ increased significantly from 924 m³ attenuation.
- Small SW Infiltration Basin on the south perimeter with overflow into the south ditch remains the same at 78 m³, serving a small local catchment

Despite these changes in volumetric storage, the basin areas shown on RSK drawings are the same.

An important point is that runoff will have to be **pumped** from the south up to the northern infiltration basin, which will require a power supply and incur a clear running cost and regular maintenance programme. This would likely have to be adopted by the council and charged to residents: pumped drainage schemes are usually introduced only as a last-resort in places which have already been developed, not designing such schemes from new, with a preference for gravity-drainage. Runoff from 66% of the drained urban area [roughly 3 ha] would be pumped back to the infiltration basin after attenuation, at a rate of 3.8 l/s in a 525 mm diameter pipeline.

The proposed scheme also continues to rely on **ground raising** [Stantec Section 4.8.9], in particular as the Infiltration Basin North occupies low-lying ground with seasonally high groundwater levels. This is shown in [Figure 1](#). The extent of ground-raising will still be substantial, in particular in the area of infiltration using imported filter media.

Although dispersed soakaways scattered across the central part of the planned urban area are no longer shown, the proposed site layout continues to rely on widespread **permeable paving** to allow infiltration. However, a robust conceptual model and understanding of the shallow hydrogeological processes has not been presented, especially as these processes will be altered during construction and earth-moving activities, which generally compact the ground surface. The abandoned soakaways are shown in [Figure 2](#) on the new drainage network and catchments.

The ground has generally been assumed by Stantec to be homogeneous for design purposes, with no consideration given to a shallow **horizon of sandy clay** in the Northmoor Terrace deposit which has a much lower permeability than the deeper sand and gravel. The porous paving across the site will infiltrate into this layer, which is found consistently across the Sutton Courtenay area. The process of mass-movement of soil across the development is difficult to manage on most construction sites where soil compaction generally occurs, and this would affect infiltration beneath the porous paving.

Groundwater data are still only available for a short period in Stantec Table 2.1 [Winter 2020-21], and a longer time-series would likely show groundwater flooding at the surface in NE and SW sectors of the site. Stantec has failed to demonstrate whether long-term groundwater levels or climate-change groundwater levels would be higher than those observed in 2020-21.

There has been no further detail on the **construction of the Infiltration Basin North**, in particular with respect to freeboard, infiltration rate achievable and stability of the steep basin embankments shown in the original design. The infiltration rate given in the RSK drawing is 35.8 mm/hr, a surprisingly precise number given the lack in information on materials. This contradicts the value given in the report text of 32 mm/hr. These values in fact appear to have been derived from trial pit soakage tests, the nearest being SA102, which was tested to an infiltration rate of 35.8 mm/hr. This is therefore local in-situ materials and not the engineered basin.

Furthermore, the infiltration basin is shown on RSK drawings with an invert level of 52.2 mOD, which is the same as the original design. This basin lies in an area with 0.35 to 0.45 m depth to winter groundwater and existing ground level of 51.7 mOD, that is an approximate freeboard of only 0.5 m, not the required 1 m. The design therefore remains flawed and does not comply with SuDS guidelines.

In conclusion, success of the proposed scheme hinges on the capacity to pump excess runoff from the attenuation basin to the infiltration basin and construction of a raised blanket of filter media and a stable infiltration basin with associated maintenance programme. These details are not provided.

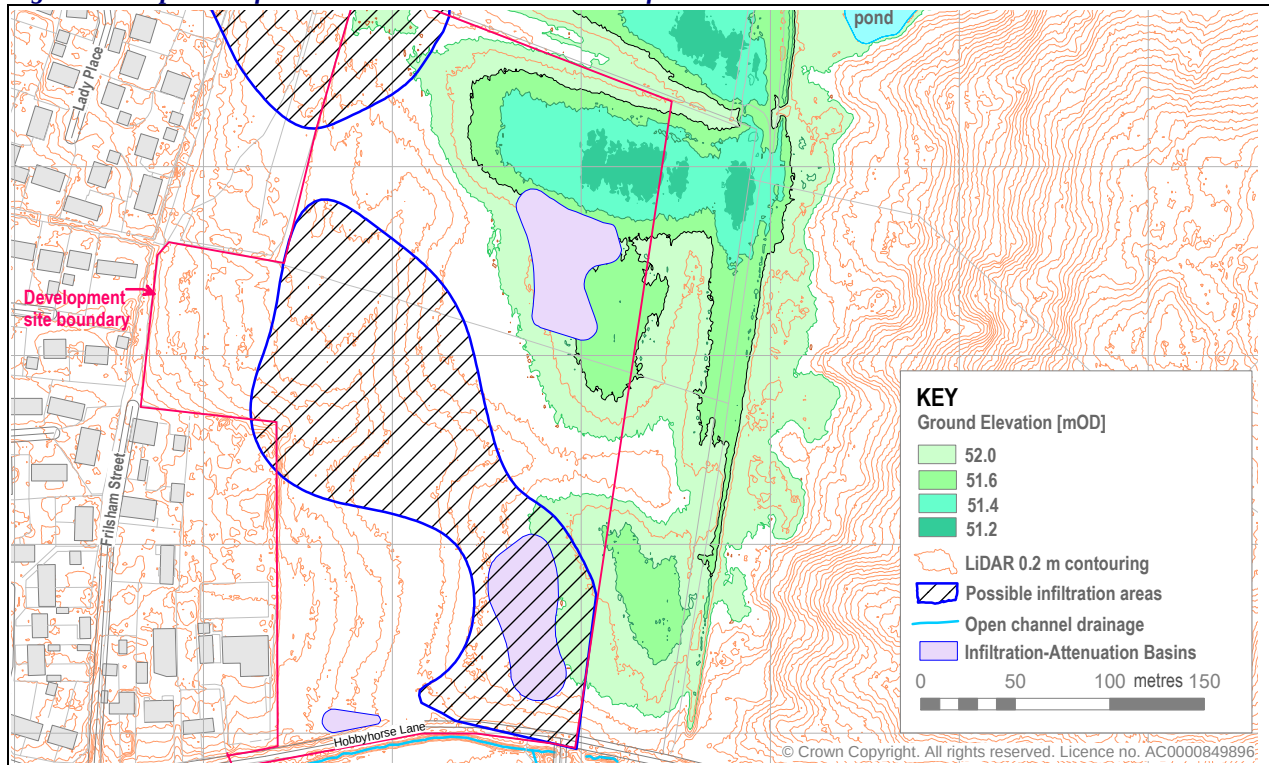
WRA has not checked the drainage calculations or reported groundwater levels.



Paul A C Holmes, BSc MSc CGeol FGS

Partner, Water Resource Associates LLP

www.watres.com 5th October 2026

Figure 1 Proposed Infiltration Basin and Areas where Infiltration is Feasible**Figure 2 Proposed New Layout, Catchments and Drainage Basins**