



## Sutton Courtenay Parish Council

### Minutes for a meeting of the Parish Council held on Friday 20<sup>th</sup> September 2024 at Sutton Courtenay Village Hall, commencing at 6.00pm.

Present: Councillors Rita Atkinson (chairman), Robert Dalby, Ian Pratley and Hugo Raworth.  
In attendance: 0 members of the public.

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2024/151 Public Participation  
No matters were raised.

2024/152 Apologies for absence  
Apologies for absence were received from Councillors Teresa Field, Paul Galliver, Lyn Hodder and Joanna O'Callaghan. Apologies were received from the Clerk.

2024/153 Declarations of Interest  
No declarations of interest were received.

2024/154 Planning application P24/V1628/DIS Land north of Hobbyhorse Lane

**RESOLVED** that the following observations would be submitted:

P24/V1628/DIS Land north of Hobbyhorse Lane, Sutton Courtenay – Objection and that the following response would be submitted.

While Sutton Courtenay Parish Council (SCPC) acknowledges that there is no requirement for the VWHDC Planning to formally consult on the above application, SCPC continues to have serious concerns about the submissions by the applicant on the Discharge of condition 20 (Groundwater Sampling and Testing) on application P21/V2682/O (Appeal ref: APP/V3120/W/23/3322187).

In SCPC's view the reasons set out by the VWHDC Planning (dated 20 June 2024) in its refusal of the applicant's previously submitted discharge of Condition 20 (Vale Ref. P24/V0897/DIS), have not been met by this updated application (P24/V1628/DIS).

SCPC firmly opposes the revised application for reasons set out below with reference to the points raised by VWHDC Planning in its letter dated 20 June 2024 for refusal of P24/V0897/DIS.

#### 1 "The application does not include a risk assessment"

SCPC believes that this new submission does **not** contain a risk assessment. GRM has provided four additional paragraphs under the title "Risk Assessment" on page 6 of its letter that simply provides:

- A description of the site: *this is useful background and would inform any risk assessment but it does not constitute the risk assessment.*
- States that the site is not located in close proximity to a groundwater Source Protection Zone (SPZ) – *there is no reference given to the level of the SPZ (risk of contamination) and a reference should have been provided to substantiate the GRM argument.*
- Provides a statement about current ground water flow - *provides no assessment on how this will change (on site and in the environs) in the construction phase and post-development when the houses are occupied.*
- Acknowledgment of groundwater fluctuation - *but an unsubstantiated statement that groundwater flow from the site is predominantly to the north east and sometime the north.*

***A risk assessment is a systematic process of identifying hazards and their potential consequences to both humans and the environment, evaluating the risk under normal conditions and the residual risk once preventative and/or mitigating measures have been identified in fault conditions.***

GRM appears to have a provided qualitative description which falls well short of a risk assessment and the applicant should be asked to provide a full risk assessment as required by Condition 20.

**2 “Would rainfall experienced in February and March 2024 be a reasonable representation of typical ground water conditions for the site and would they have affected the data gathered?”**

VWHDC Planning asked (20 June 2024) that the applicant addresses the heavy rainfall in February and March following the statement by the Environment Agency advising that February was the fourth wettest on record and in March 2024 rainfall was above average.

The revised letter from GRM refers to previous samples undertaken in March 2016 and August 2023 which were reported as part of the appeal process. It states that these were done during drier conditions. SCPC suggests that this does not address the issues raised by the VWHDC Planning for the following reasons:

A These assessments were already included in the appeal and despite these the inspector required that additional updated testing be required.

B The fact that the results of the groundwater tests match those taken in 2016 and 2023 is not evidence that the additional rain water had no impact on ground water pollution.

The GRM comment that the additional rainfall creates a “worst case scenario” appears to be conjecture as there is no evidence to substantiate it.

Additional groundwater testing in dryer conditions may have also provided useful evidence but is missing from the updated application.

C The recent major Leachate incident at the FCC landfill site would indicate that additional work is required before Condition 20 can be approved. For example, has the Leachate pooling on the west side of the landfill site close to the Hobbyhorse lane site had any impact on ground water pollution?

D GRM states that “it is unlikely that Leachate is migrating towards the site given that the predominant groundwater flows towards the northeast away from the landfill.” SCPC understands that the recent Leachate ponding to the west of the landfill site provides clear evidence that this may not be not the case.

E No additional evidence is provided by GRM substantiate the additional statements regarding the heavy rainfall.

**3 “to address the risk of a change in the ground water hydraulics/water table as a consequence of elevating the ground level by 0.7m.”**

GRM has just added a single paragraph on page 7 of its letter stating that any minor changes in groundwater level will be minor due to the “aquifer being unconfined and will not change the direction of ground water flow”.

Raising the level of the site is required to mitigate the flooding that regularly occurs on the site. What work has the applicant undertaken to ensure that the proposed aquifer will be able to accommodate the ground water flow? Surely something more detailed should be provided than just the unsubstantiated claim detailed above – perhaps through modelling?

**4 New Evidence**

With reference to the FCC Leachate incident (2024) there may be potentially new hazards/ risks at the HHL Development Site and the impact on the local water course which should be considered.

**5 Ground Contamination Risks**

The raising of the ground level by 0.7 metres will mean suitable foundations for dwellings will be needed. As part of an appropriate risk assessment, the applicant should identify and show mitigation for risks of creating new pathways for leachate from the NHHL Landfill site to travel; especially if screw and / or hammered Piles are used. This has not been addressed in GRM’s letter.

In conclusion, the addition of several paragraphs of the letter provided by GRM falls short of satisfying the VWHDC Planning’s requirements to close out Condition 20.

As discussed above, it

- has provided descriptive text instead of a systematic and comprehensive risk assessment;
- does not fully address or provide details of any work undertaken by the applicant to address the potential shortcomings of their ground water testing
- does not address the VWHDC Planning's concern about the effect of raising the ground by 0.7 metres on the water table.

In light of all the arguments set out in the letter, Sutton Courtenay Parish Council urges that VWHDC Planning rejects this application.

#### Close of meeting

It was noted that the next ordinary meeting of the Council would be held at 7.15pm, on Tuesday 1<sup>st</sup> October 2024. There being no further business the Chairman declared the meeting closed at 6.29pm.

Signed .....

Dated .....