To: Development Management, West Oxfordshire District Council (WODC)

From: Brize Norton Parish Council (BNPC)

Date: 17 September 2026

Application: 26/01803/RES – Reserved matters (layout, scale, appearance and landscaping) at Land at Kilkenny Farm, Burford Road, Brize Norton

Related outline permission: 25/00487/OUT

1. Summary of BNPC's core concerns

1.1. This document and Brize Norton Parish Council ('**BNPC**')'s concerns are not a re-litigation of outline permission 25/00487/OUT. The outline decision determined the principle of development, the maximum of 350 dwellings and the approved Burford Road access; it left various matters – including detailed foul and surface-water drainage – to be resolved through conditions.[1]

1.2. BNPC's core concern, set out under headings 2 and 3 below, is that the Phase 1 reserved-matters layout submitted under application 26/01803/RES must not approve, assume, enable or practically predetermine a foul-water solution which remains subject to Outline Condition 14.[2] Approval of the current reserved-matters proposals must not commit the site to a drainage solution that cannot be delivered in compliance with those conditions. BNPC also raises further material concerns regarding other matters under headings 4 and 5 below.

1.3. BNPC therefore objects to the Application and requests determination be deferred unless and until the Local Planning Authority is satisfied, following consultation with Oxfordshire County Council as Lead Local Flood Authority, Thames Water and the Environment Agency, that the proposed Phase 1 layout will not prejudice the delivery of a lawful, technically workable and properly safeguarded drainage solution under Outline Conditions 12, 13 and 14.

1.4. If the Authority is minded not to defer, BNPC requests that the decision notice include express, enforceable safeguards confirming that reserved-matters approval neither approves nor predetermines any foul-water solution, that no occupation of any phase is permissible until

[1] West Oxfordshire District Council, Committee Report, 12 January 2026, application 25/00487/OUT, officer Fern Lynch, Conditions 2, 12, 13 and 14.

[2] Condition 14: *"No development approved by this permission shall be occupied until a phased foul drainage strategy that can either be delivered by Thames Water, or via a Private Treatment System delivered by the Applicant, has been submitted to and approved by the Local Planning Authority."*

the relevant foul-drainage strategy and infrastructure are approved and fully operational, and that the relevant pre-commencement and pre-occupation conditions remain fully operative and enforceable.

2. Wastewater and foul drainage

2.1. Concern 1: unresolved foul-water solution and layout predetermination

(a) BNPC raised the same core point in its April, June and September 2025 representations on the outline application. First, the original proposal assumed foul-water routes to Carterton and Witney treatment works without demonstrating a workable connection or its effect on the Brize Norton sewage pumping station.[3] Second, the claimed Burford Road connection "*just outside the site*" was not supported by the information then provided by Thames Water, which placed the nearest identified connection point east of Monahan Way.[4] Third, the Applicant's approach had moved from an assumed public-network solution to a proposal for multiple on-site treatment plants. These concerns remain material because the current RM1 application does not resolve either route but defers the detailed foul-water solution.

(b) BNPC is concerned that the eventual, foul-water route and capacity remain unapproved. The reserved-matters layout, including the positioning of roads, dwellings, levels and service corridors, could prejudice or preclude a future mains-connection solution and may create practical reliance on a particular foul-water disposal route before that route has been assessed or approved.

(c) Approval of the reserved matters must not be treated as approval of, or as predetermining the acceptability of, any private foul-water treatment plant, discharge point, discharge to pond or swale, outfall, associated wastewater infrastructure or particular capacity solution.

(d) Outline Condition 14 requires a phased foul-drainage strategy to be approved before occupation. That strategy must demonstrate either proven public-sewer capacity, agreed phasing and completed necessary upgrades, or an interim private treatment system agreed following consultation with the Environment Agency. The layout now proposed should not foreclose either option or make one inevitable by default.

[3] BNPC 9 April 2025 response to application 25/00487/OUT, stated: *"Brize Norton's SPS becomes overwhelmed in the event of prolonged or heavy rain, which leads to a mixture of human waste and surface water surcharging onto Station Road" and "there is NO wastewater system on Burford Road (west side of Monahan Way)."*

[4] BNPC 9 April 2025 response, referring to reports by Carter Jonas, TSLR Consulting, and Baynham Meikle, stated: *"The nearest connection point to the main sewerage system is NOT 'just outside of the site' but is in fact, some way down Burford Road on the east side of Monahan Way".*

2.2. Concern 2: deliverability and environmental permissibility of a private treatment system.

(a) BNPC is concerned that a private foul-water treatment system may not be deliverable or environmentally permissible for this site.

(b) The Environment Agency's response of 21 October 2025 objected to the application on the basis that non-mains foul drainage was proposed without adequate evidence that connection to the public sewer was infeasible.[5] Its subsequent response of 4 December 2025 withdrew the objection only because of the occupation-restricting condition that became Outline Condition 14. That response treated public-sewer connection as the preferred solution; stated that private treatment facilities create a greater pollution risk; found that the Applicant had not demonstrated adequate cost or practicability justification for non-mains disposal; and stated that an environmental permit for the private system was, on the information then available, very unlikely to be granted.[6]

(c) The Environment Agency's conditional withdrawal materially qualifies any suggestion that there is no fundamental technical reason an environmental permit would be successful. The lawfulness of an occupation restriction does not establish that either eventual foul-water route—public-sewer connection or private treatment—is deliverable.

(d) The Applicant's Foul Drainage Position Statement for the current reserved-matters application confirms that the detailed foul-drainage solution is not being determined through RM1. It refers to an environmental-permit application said to have been submitted in June 2026 but provides no evidence of its current status, the proposed discharge arrangements or the likelihood of a permit being granted. In light of the Environment Agency's earlier response, BNPC is concerned that the evidence presently available does not demonstrate that a private treatment system is deliverable, capable of being permitted or capable of operating without unacceptable pollution risk.

[5] Environment Agency, letter to West Oxfordshire District Council, 21 October 2025, reference WA/2025/132074/04-L01, application 25/00487/OUT, stated: "*We object to the proposed development as submitted because it involves the use of a non-mains foul drainage system in circumstances where it may be feasible for the development to be connected to a public sewer but inadequate justification has been provided for the use of a non-mains system*"; "*Lack of capacity or plans to improve capacity in the sewer is not a valid reason for a development to install a private sewerage system*"; and "*on the basis of the information currently available within the planning application it appears unlikely that we would be able to grant a permit.*"

[6] Environment Agency's later letter to West Oxfordshire District Council, 4 December 2025, reference WA/2025/132074/05-L01, stated: ""*The proposed development will be acceptable provided that the following condition is included within the planning permission's decision notice. Without this condition we would object to the proposed development due to its adverse impact on the environment*"; "*To operate a private package treatment plant of this size lawfully an environmental permit is required. As submitted, it is very unlikely this application will be granted a permit*"; and "*Private sewage treatment facilities should only be used where it is not feasible for a development to be connected to a public sewer.*"

2.3. Concern 3: public-sewer capacity is not established.

(a) BNPC is concerned that there is no confirmation that the public sewer network has capacity to serve this development.

(a) Thames Water's June 2025[7] and September 2025[8] consultation responses stated that it could not determine foul-water infrastructure needs because final connection points, anticipated flows and the calculation method had not been supplied, and it requested an occupation restriction because reinforcement might be necessary to avoid sewage flooding and pollution. Thames Water's later response to 25/00487/OUT was given only on the premise that the revised strategy would not connect to the Thames Water network, while retaining the phased foul-drainage condition under Outline Condition 14. That response should not be characterised as confirmation of available public-sewer capacity.

(b) Thames Water's recent response to the current Application, DTS reference 77795 dated 10 September 2026, has reiterated that Thames Water remains: "*Unable to advise on capacity without confirmation of points of connection to the public sewerage system as well as the anticipated flows (including flow calculation method) into the proposed connection points*".

(c) BNPC's 9 April 2025 representations recorded its understanding that the Brize Norton sewage pumping station had experienced sewage surcharge during prolonged or heavy rainfall,[9] that Thames Water had been investigating surface-water ingress into the foul network and that identified remedial works had not been committed. Its September 2025 representation also challenged the Applicant's assertion of confirmed connection points and capacity at Witney and Carterton, and recorded Thames Water information indicating that capacity depended on future modelling and works.

(d) The current Foul Drainage Position Statement asserts that Thames Water upgrade works are ongoing,[10] but BNPC has seen no evidence identifying their location, scope,

[7] Thames Water's consultation response, 6 June 2025, DTS reference 77795, application 25/00487/OUT – Additional information, stated: *"With the information provided, Thames Water has been unable to determine the Foul water infrastructure needs of this application"*; "*Network reinforcement works may be required to accommodate the proposed development. Any reinforcement works identified will be necessary in order to avoid sewage flooding and/or potential pollution incidents"*; and "*a drainage strategy should contain all points of connection to the public sewerage system as well as the anticipated flows (including flow calculation method) into the proposed connection points.*"

[8] Thames Water, 15 September 2025, DTS reference 77795, application 25/00487/OUT – New Drainage 08/25, repeated: "*it is not clear how the foul water from the development will be discharged*".

[9] BNPC 9 April 2025 response to application 25/00487/OUT: *""The major issue with the SPS, is that it becomes overwhelmed in the event of prolonged or heavy rain, and storm events which causes the system to back-up.*"

[10] HarperCrewe Ltd, Kilkenny Farm, Carterton – Foul Drainage Position Statement – Reserved Matters Application 1, undated, application 26/01803/RES, states: *"HarperCrewe Bloombridge is in discussions with Thames Water regarding the upgrade works that are currently taking place to the local drainage infrastructure."*

funding, programme or capacity benefit, or confirming that they would serve this development.

(e) BNPC notes the following comments made by Windrush Against Sewage Pollution (WASP) in their response to this Application:[11]

(i) Paragraph 7: *"The statements from Harper Crewe and Thames Water are to some extent contradictory. WASP does not know of any network upgrades presently being undertaken by Thames Water that will address the acknowledged problems at Brize Norton SPS, which the original application identified as the receptor site for a proportion of the foul water from the development. To this extent, Harper Crewes submission seems inaccurate."* [emphasis added]; and

(ii) Paragraph 10: *"The facts are therefore very clear; at present, there is no evidence that any foul water from the proposed 134 houses can legally be discharged into the Thames Water sewage system leading to Brize Norton SPS without continued and increased illegal pollution of the village and surrounding area."* [emphasis added].

(f) BNPC requests that the Applicant provide those particulars and Thames Water confirmation.

2.4. Concern 4: material change in the Applicant's foul-drainage position since the outline stage.

(a) BNPC is concerned that the Applicant's foul-drainage position has materially changed since the outline stage. The drainage material and Counsel's opinion submitted in support of outline permission 25/00487/OUT advanced a defined private-treatment concept comprising phased modular package plants, two interconnected plants to be installed at the outset, 24-hour emergency storage, treated-effluent discharge at approximately 0.347 litres per second into attenuation ponds, and onward discharge to the southern ditch through sensors, penstock and hydrobrake controls.[12]

(b) By contrast, the current Application and supporting Foul Drainage Position Statement states that the detailed foul-drainage solution is not being determined through the reserved matters Application itself.[13] The current Application therefore does not provide the plant location, capacity, discharge route, receiving-watercourse

[11] Windrush Against Sewage Pollution, Response to Application, 18 September 2026.

[12] Richard Banwell, Six Pump Court Temple, Advice Note: Proposed Drainage Strategy, dated 22 October 2025, submitted in support of the Applicant, stated: *"The first phase will however involve the commissioning of two separate plants, with inter connectivity"*; "*In accordance with the Building Regulations the treatment plants have emergency storage capacity for up to 24hrs worth of foul effluent"*; and "*Once commissioned, treated wastewater will be discharged from each treatment plant at a rate of approximately 0.347 l/s into the attenuation ponds.*"

[13] HarperCrewe Ltd, Kilkenny Farm, Carterton – Foul Drainage Position Statement – Reserved Matters Application 1, undated, application 26/01803/RES, states: "*The detailed foul drainage solution for the development is not being determined through the first phase Reserved Matters application and remains subject to the separate approval and discharge of Condition 14.*"

assessment, emergency-storage detail, management entity or environmental-permit evidence[14] which underpinned the outline-era case.

(c) BNPC is therefore concerned that the Authority cannot assume that the private-treatment concept advanced at the outline stage remains deliverable, capable of being permitted or compatible with the Phase 1 layout now proposed. The absence of the detail that supported the outline-era case means there is no current evidential basis on which to conclude that a private foul-water solution can be delivered in compliance with Outline Condition 14.

2.5. Accordingly, BNPC respectfully asks that the Planning Authority requires:

(a) Confirmation in the officer report and decision notice that reserved-matters approval does not approve or predetermine any private foul-water treatment plant, discharge point, discharge to pond or swale, outfall, associated wastewater infrastructure or particular capacity solution;

(b) Formal consultation with the Environment Agency, Thames Water where relevant, Oxfordshire County Council where surface-water and receiving-watercourse matters arise, and Brize Norton Parish Council on every future phase-specific foul-drainage strategy submitted under Outline Condition 14;

(c) That the Applicant provide the environmental-permit application reference and current status, together with evidence of pre-application engagement with the Environment Agency, before any private system is approved;

(d) That it be reiterated that no occupation of any phase is permissible until the relevant foul-drainage strategy and infrastructure are approved and fully operational;

(e) A full public-sewer feasibility appraisal, including comparative costs and an assessment of physical and practical barriers to mains connection, to be provided before any private treatment system is considered for approval;

(f) An evidenced strategy specifying for each phase the treatment-plant capacity, expected phase flows and treatment standard;

(g) The discharge route, discharge location and a receiving-watercourse assessment, including assessments of phosphorus, ammonia, suspended solids and biological oxygen demand;

[14] HarperCrewe Ltd, Kilkenny Farm, Carterton – Foul Drainage Position Statement – Reserved Matters Application 1, undated, application 26/01803/RES, states: *"HarperCrewe Bloombridge submitted an application for an Environmental Permit to the Environment Agency in June 2026"*.

(h) Emergency or holding-storage capacity and maximum holding duration if discharge must cease, together with control-system, telemetry, power-failure and manual-override arrangements;

(i) The identity of the legal operator, long-term management and maintenance regime, funding mechanism and enforcement arrangements for any private treatment system;

(j) A phase-specific removal, restoration and funding plan demonstrating how private treatment infrastructure will be decommissioned and the land restored to public open space when mains capacity becomes available, including a clear trigger, timetable and funding mechanism.

3. Surface-water drainage

3.1. BNPC cannot yet be satisfied that the detailed Phase 1 surface-water drainage design will avoid increased flood risk in the Kilkenny Lane drainage network, particularly in extreme storm events or when the receiving ditch is at or close to bank-full.

(a) Outline Condition 12 requires, before commencement, detailed drainage calculations to the 1-in-100-year storm event plus a 40% climate-change allowance, a flood exceedance conveyance plan, detailed SuDS design, water-quality treatment measures, outfall details and evidence that all necessary third-party drainage consents have been obtained. Outline Condition 13 requires as-built records of installed SuDS, confirmation of pond drain-down times, management-company information and safety measures for permanently wet ponds.

(b) The current Application includes attenuation and infiltration measures, but the Applicant's descriptions of penstocks, emergency storage and active outfall controls remain proposals rather than approved operational arrangements. Jackson Purdue Lever, Drainage Strategy, 20 July 2026, document reference 003171-JPL-ZZ-ZZ-RP-D-2001-S3-P02, submitted in support of the Application, states: *"There is an existing watercourse that runs along the site's southern boundary with Kilkenny Lane within an existing hedgerow*"; "*It is proposed to restrict the development to this rate as part of this reserved matters application. A vortex flow control is proposed in order to restrict the discharge rate from site*"; and "S*urface water is to be conveyed in series through these attenuation features, before discharging to the existing watercourse along Kilkenny Lane."* [emphasis added]

(c) BNPC's April 2025 representation noted that the original flood-risk material acknowledged 2007 flooding near Westbrook House but did not, in BNPC's view, account for later events in the Burford Road and Kilkenny Lane area, including the November 2024 event and the reported 2025 flooding of Westbrook House. BNPC's June and September 2025 representations repeated concerns over the capacity and

failure scenarios of attenuation ponds, surface-water flow routes and downstream receptors in the Kilkenny Lane ditch network. BNPC remains concerned the Application does not demonstrate the specific bank-full, exceedance and combined-discharge scenarios raised in those earlier representations.

(d) BNPC has reviewed Environment Agency Permit TH/NPSWQD004505/002,[15] granted to Smith & Sons (Bletchington) Limited in respect of Burford Quarry. That permit authorises *"Trade effluent consisting of dewatering of groundwater and rainwater from a limestone quarry excavation."*[16] Whilst it does not regulate the proposed development, it is material evidence of the sensitivity of the receiving system into which the development proposes to discharge. Critically, the Burford Quarry permit provides: "*The Discharge shall only occur when the flow in the Brize Norton Stream, at the point the tributary joins, is less than bank full*" and that "*No discharge shall occur under the terms of this permit when there is an Environment Agency Flood Alert on The River Thames from Buscot down to Kings Lock, above Oxford or Flood Warning on River Thames between Buscot and Shifford or on The River Thames between Newbridge and Kings Lock above Oxford unless agreement to do so is given by the Environment Agency.*" [emphasis added]

(e) BNPC is concerned that the Application does not provide an equivalent development-specific assessment of how surface-water flows, or any future treated-foul-water discharge previously described as passing through attenuation ponds to the Kilkenny Lane ditch, will operate when that ditch and the connected Brize Norton Stream system cannot accept further flow.

(f) BNPC respectfully asks that the Authority requires from the Applicant a coordinated hydraulic, water-quality and operational assessment identifying the precise receiving watercourse and discharge point; the relevant bank-full trigger; the relationship between the development proposals and the quarry permit's bank-full restriction; discharge-control arrangements; available surface-water and foul-water storage; the maximum safe holding period; exceedance routing; the consequences of hydrobrake, penstock, telemetry or power failure; the responsible operator; maintenance; emergency response; and the necessary Environment Agency and Lead Local Flood Authority approvals.

3.2. BNPC also has concerns about the reliance on infiltration and the speed and management of drainage after heavy rainfall.

(a) BNPC's outline responses in 2025 raised concerns that multiple proposed on-site treatment plants could introduce an additional volume of treated water into the local ditch and stream network at a time when BNPC considered that network to be

[15] Notice of variation and consolidation dated 2 October 2013, variation application NPSWQD004505/V001.
[16] Discharge at: "*Maximum daily discharge volume 864 m3/day*" and "*Maximum rate of discharge 10 litres per second*."

susceptible to flooding.[17] BNPC also referred to RAF Brize Norton concern about water surcharging at downstream culverts.[18] This concern is reinforced by Environment Agency Permit TH/NPSWQD004505/002, which imposes a bank-full and Flood Alert/Flood Warning discharge restriction on quarry dewatering entering a tributary of the Brize Norton Stream.[19]

(b) The outline officer report recorded clay and mudstone geology and limited infiltration capacity at the site,[20] and Outline Condition 13 requires as-built records of installed SuDS, confirmation of pond drain-down times, management-company information and safety measures for permanently wet ponds.

(c) The current Application does not determine the final foul-water discharge route or volume and therefore does not answer those concerns. The current Drainage Strategy (Jackson Purdue Lever, 20 July 2026, reference 003171-JPL-ZZ-ZZ-RP-D-2001-S3-P02) states: "*Previous infiltration testing identifies an infiltration rate of 1.39x10-5m/s in the location of the infiltration basin.*"

(d) BNPC is not satisfied that the current proposals adequately address infiltration limitations, pond drain-down performance or the long-term management and funding of SuDS assets in light of the recorded ground conditions. BNPC is also concerned that the safeguarding implications of detained surface water during bank-full conditions have not been assessed, and that the relationship between any hydrobrake or penstock operation and the water quality of the receiving watercourse has not been demonstrated.

(e) BNPC therefore asks that the Applicant be required to demonstrate, rather than assume, that any treated-effluent discharge proposed under Condition 14 can be withheld safely and without adverse flood-risk, water-quality or safeguarding consequences when the Kilkenny Lane ditch is unable to accept further flow. BNPC requests that they be tested as part of the future Condition 14 foul-drainage strategy and the related surface-water approvals under Outline Conditions 12 and 13.

[17] BNPC's 9 April 2025 response: *"The Consultant has FAILED to declare that there have been numerous flooding events since 2007 in the Burford Road/Kilkenny Lane area."* and September 2025 response: *"*[BNPC] *has serious concerns about any calculations of attenuation pond volumes."*

[18] The outline officer report recorded the MOD holding objection, noting: "*DIO have concerns as to whether the proposals will adequately mitigate the levels of runoff from the site in relation to downstream flooding, and that adequate provision will be delivered for sewage treatment, sufficient to demonstrate that the proposals will not have an adverse impact on operations at this site."*

[19] Paragraphs 3.1(d)-(f) above.

[20] Outline officer report (West Oxfordshire District Council, Committee Report, 12 January 2026, application 25/00487/OUT, section 8) recorded that *"the site is underlain by clay and mudstone and therefore there will be limited capacity for infiltration devices such as soakaways*."

3.3. BNPC requests formal confirmation from the Lead Local Flood Authority, following consultation with the Environment Agency and Thames Water where relevant, that the Phase 1 surface-water proposals satisfy Outline Conditions 12 and 13, specifically addressing:

(a) groundwater levels and infiltration assumptions given the recorded clay and mudstone geology and limited infiltration capacity;

(b) the operation of outfall, penstock and hydrobrake controls when the receiving ditch is at or near bank-full, including the consequences of outfall-control failure;

(c) the volume of holding capacity and the maximum holding period if discharge must cease; exceedance routing if detention features surcharge or fail to drain down as modelled; pond drain-down times;

(d) MOD/RAF Brize Norton safeguarding risks arising from the detention of surface water during bank-full conditions;

(e) water-quality impacts of any additional discharge, including treated foul-water output, on the receiving watercourse;

(f) pond safety;

(g) the responsibility and funding for long-term maintenance and inspection of all SuDS and drainage assets; and

(h) confirmation that all required land-drainage consents and watercourse consents for works to, or connections into, ordinary watercourses will be secured before commencement.

4. BNPC's Further Concerns

4.1. **Materials:** BNPC is concerned that the proposed extensive use of red brick is not consistent with the Brize Norton Neighbourhood Plan, the Design Code and more generally with a locally appropriate palette for a rural edge-of-village site.

(a) This concern was raised in BNPC's July 2026 meeting with the Applicant. It remains a relevant reserved-matters issue because the appearance of dwellings, particularly those in prominent locations facing Kilkenny Lane Country Park, is a matter of appearance directly before the Authority on this application.

(b) The submitted Design and Access Statement describes a palette which is predominantly red brick, with stone used selectively. [21] BNPC's assessment is that approximately 67% of the proposed dwellings are red brick and approximately 33%

[21] Applicant's Design and Access Statement (Marrons for HarperCrewe Ltd, Kilkenny Farm, Burford Road – Design and Access Statement, July 2026, application 26/01803/RES) states: *"Red brick forms the primary material across the site, stone will be applied to key buildings."*

stone. This is of particular concern for the prominent two-and-a-half-storey dwellings visible from Kilkenny Lane Country Park,[22] where BNPC considers their location and visual prominence more significant than their height alone.

(c) BNPC is concerned that the elevation treatment is not sufficiently informed by the local character and materials expectations of the Brize Norton Neighbourhood Plan and its Design Code. BNPC notes policies 4.51 and 4.52 are relevant to this assessment and requests that the case officer identifies, with reasons, how the proposed materials comply with those policies, including the Design Code expectation for natural or reconstituted stone rather than redbrick (as the locally appropriate material).

(d) BNPC respectfully requests revised elevations, a plot-by-plot materials schedule and a visual assessment from Kilkenny Lane Country Park, demonstrating a locally appropriate palette; in particular, addressing the most prominent park-facing plots.

4.2. **Boundary landscaping and screening:** BNPC is concerned that the submitted landscape proposals do not show adequate trees or robust boundary planting along the Kilkenny Lane Country Park boundary, despite assurances given during public consultation that such planting would be provided.

(a) BNPC's April and September 2025 outline representations identified Kilkenny Lane Country Park as a green buffer and a sensitive natural recreational space, and raised concern that development, boundary treatment, lighting and new connectivity could erode its landscape character and tranquillity. The outline grant has determined the principle of development, but those earlier concerns remain directly relevant to the present reserved-matters questions of planting, visual screening, lighting, path design and the relationship between the built edge and the Country Park.

(b) At the public consultation, BNPC and its residents were informed that there would be trees planted to shield the new housing from Kilkenny Lane Country Park. Effective boundary screening is integral to the landscaping proposals now before the Authority, which directly affects the visual relationship between the development and the surrounding countryside. BNPC is concerned that there is no material attempt to shield the houses along the southern boundary of the development.[23]

[22] Applicant's Design and Access Statement also records that "*The proposed development will predominantly consist of 2 - 2.5 storey dwellings*"

[23] The Landscape Statement (HarperCrewe, Planning Condition 3 – Landscape Statement, July 2026, revision P4 dated 23 July 2026, application 26/01803/RES) records: "*In accordance with the requirements set out in Condition 3, dwellings have been set back at least 10m from the northern site boundary*," but BNPC is concerned that equivalent landscape delivery commitments for the southern and Country Park boundaries are not demonstrated.

(c) BNPC requests revised, coordinated landscape plans for the southern and Country Park boundaries, specifying minimum planting sizes, species, a five-year aftercare and replacement programme.

(d) BNPC also asks that it is a condition of permission that screening planting is made before or at the start of construction, so that visual, audible and environmental impacts on users of Kilkenny Lane Country Park are mitigated during the extended construction period.

4.3. **Inconsistent base plans:** BNPC is concerned that the landscape and planting drawings submitted with this application appear to use inconsistent base plans. In particular, the roundabout approved under the outline permission does not appear on certain landscape and planting drawings, which prevents a reliable assessment of the interface between the landscape proposals and the highway layout. BNPC requests that the Applicant provide coordinated, scheme-specific plans that accurately reflect all approved infrastructure, including the roundabout, so that the Authority can properly assess the landscaping and appearance matters before it.

4.4. **Play provision:** BNPC is concerned that the reserved-matters proposals do not adequately address the needs of older children or specify inclusive and accessible equipment.[24] A development of up to 350 dwellings is intended to function as a substantially self-contained community, and play provision should not be limited to LEAPs. BNPC requests that the Authority confirm that the play provision shown in the reserved-matters plans meets the requirements of the outline permission and the Section 106 agreement, including provision for older children and inclusive access.

4.5. **Almshouses, safeguarding and amenity:** BNPC is concerned that the proposed position and relationship of the almshouses, play areas and public realm require a clear safeguarding and amenity assessment.

(a) The reserved-matters plans should demonstrate adequate natural surveillance of play areas and public spaces, appropriate boundary treatments between the almshouses and adjacent uses, and that the siting of the almshouses does not give rise to unacceptable amenity or safeguarding issues.

(b) BNPC respectfully requests that the Applicant be required to produce such assessment(s) in order that the Authority can satisfy itself on these matters before approving the layout.

[24] Marrons for HarperCrewe Ltd, Kilkenny Farm, Burford Road – Design and Access Statement, July 2026, describes: "*A Locally Equipped Area for Play (LEAP) positioned at the heart of the village with good natural surveillance.*" and the Landscape Statement adds: "*The second LEAP will be located in the new woodland block to the south-west of the site*" and "*The LEAP has an activity zone of 450sqm.*"

4.6. **Pond safety:** BNPC is concerned that permanently wet attenuation ponds present an unmitigated safety risk to children and other users of the open space.

(a) The Design and Access Statement (Marrons for HarperCrewe Ltd, Kilkenny Farm, Burford Road – Design and Access Statement, July 2026, application 26/01803/RES) states at page 61: "*A timber post and galvanised wire mesh fence, combined with a native hedge, provides containment to the primary attenuation basin maximising the habitat value of this area.*"

(b) BNPC does not consider this adequate as a child-safety strategy and respectfully requests that the reserved-matters plans include a detailed child-safety strategy for all permanently wet ponds, including fencing, self-closing gates, safe maintenance access arrangements and identification of the party responsible for ongoing inspection and maintenance of safety measures.

4.7. **Foot/cycle path:** BNPC is concerned that the foot and cycle path between Monahan Way and Crocodiles of the World is not sufficiently defined in the reserved-matters proposals, including its route across the site entrance and roundabout area. BNPC respectfully requests that the Applicant provide detailed alignment, crossing design, surfacing specification, accessibility measures, lighting proposals where applicable and long-term maintenance arrangements for the full length of this path, to enable the Authority to assess its adequacy as part of the layout and landscaping now before it.

4.8. **Community building:** BNPC asks that the Applicant be required to provide confirmation of the proposed community building's intended use, ownership, funding, handover arrangements and ongoing management.[25] In particular, BNPC asks the Authority to distinguish clearly between those matters that fall to be determined as part of the reserved-matters approval (such as the building's position, scale, appearance and relationship to the surrounding layout) and those that are secured by the outline Section 106 agreement (such as the trigger for delivery, specification and transfer arrangements), so that there is no gap in the obligations and the community is assured of a deliverable and properly managed facility.

4.9. **Long-term maintenance:** BNPC is concerned that fragmented responsibility for SuDS, drainage and landscape assets could result in maintenance failure over the lifetime of the development. This is material to the reserved-matters layout and landscaping because the effectiveness and safety of ponds, flow controls, permeable paving, planting and public-realm assets depend on clear, funded management. BNPC requests a single maintenance and inspection schedule identifying every SuDS and landscape asset, the responsible body, funding arrangements, inspection frequency, intervention triggers, record-keeping and

[25] The Design and Access Statement (Marrons for HarperCrewe Ltd, Kilkenny Farm, Burford Road – Design and Access Statement, July 2026, application 26/01803/RES) merely describe the dimensions: "*The Community Hall - 112m2.*"

enforcement arrangements, with responsibilities clearly allocated between the adopting authority, any management company and individual householders.

4.10. **Highways and infrastructure**: BNPC is concerned that details of construction traffic, the roundabout interface, Trefoil Way connectivity and the foot/cycle route crossing the development entrance remain insufficiently clear in the reserved-matters proposals. BNPC is not seeking to reopen the approved principle of access, but needs assurance that the reserved-matters layout properly accommodates the approved infrastructure and does not prevent its safe delivery.

(a) BNPC's representations of April, [26] June and September 2025 raised concerns regarding construction-HGV use of Burford Road, the condition and narrow sections of that road, the roundabout and Glebe Farm stone-wall interface, and the safety and deliverability of walking and cycling connections. These earlier points provide relevant background to the present concerns over whether the reserved-matters layout, landscaping and construction arrangements properly accommodate the approved infrastructure.

(b) HGV construction traffic using Burford Road requires an enforceable Construction Traffic Management Plan agreed with Oxfordshire County Council before commencement, covering approved routes, timing restrictions, vehicle controls, wheel cleaning, road-condition surveys, verge protection, complaints procedures and repair arrangements.

(c) BNPC requests that the Authority confirms as a stipulation of any reserved matters permission how the roundabout, the Glebe Farm stone-wall interface, the entrance crossing and strategic pedestrian and cycle connections to Trefoil Way and the wider network are secured through the outline permission and the Section 106 agreement. Consideration should be given to the highway safety implications of locating a passing place directly opposite the entrance to Glebe Farm. Consideration should also be given to repositioning the proposed roundabout from its current location on Burford Road to a point 2.8M away from the stone wall to maintain the current width of the verge and to reduce the risk of impact.

[26] BNPC's 9 April 2025 response stated: *"The road between the site northern works entrance and the A40 is used by HGV vehicles in both directions" and referred to 'narrow sections' of Burford Road."*

5. Accuracy and reliability of the application documents

5.1. BNPC is concerned that material inconsistencies in the submitted drawings and documents make it difficult to establish exactly what is being approved and undermine confidence in the coordinated design of the development.

(a) HarperCrewe Design Studio, Means of Enclosure (RM1), drawing 0048-SL-005, dated 12 June 2026, application 26/01803/RES, incorrectly identifies the site as "*BURFORD ROAD, CARTERTON*." The application form, Application for Approval of Reserved Matters following Outline Approval, reference PP-15101006, identifies the site as "*Land at Kilkenny Farm, Burford Road, West Oxfordshire*." BNPC is concerned that this inconsistency creates uncertainty as to the documents relied upon for the Brize Norton scheme.

(b) The same concern arises from the JTP architectural material. JTP, Almshouses – Elevations, drawing ZZ-ZZ-A-DR-20201, revision P01, dated 15 July 2026, identifies the project as "*Middle Norton Carterton"*. JTP, Almshouses – Floor Plans, drawing ZZ-00-A-DR-20001, revision P01, dated 15 July 2026, uses the same project description. JTP, Community Centre – Floor Plans, drawing ZZ-00-A-DR-20002, revision P01, dated 15 July 2026, also identifies the project as "*Middle Norton Carterton*". These drawings are submitted as planning documents for the current reserved-matters scheme at Kilkenny Farm, Brize Norton.

(c) Jackson Purdue Lever, Drainage Strategy, reference 003171-JPL-ZZ-ZZ-RP-D-2001-S3-P02, dated 20 July 2026, incorrectly identifies its project title as "*BURFORD ROAD, CARTERTON*" and its proposed private-drainage layout sheets as "*BURFORD ROAD, CARTERTON"*. Jackson Purdue Lever, Site Waste Management & Minimisation Statement, reference 003171-JPL-ZZ-ZZ-RP-D-7001-A1-C01, issued 14 August 2026, is headed "*Burford Lane, Carterton*". These errors are particularly concerning because the drainage drawings and supporting documents form part of the specific technical material relied upon for the Application.

(d) BNPC has also identified reported location or project-reference inconsistencies in documents prepared by GeoRisk and Macgregor Smith, and drawings with generic "ZZ" spatial-zone and functional reference fields. BNPC asks the Authority to verify these items against the application register.

5.2. BNPC requests that the Authority requires the Applicant to withdraw, correct and reissue all affected drawings and documents before they are relied on or approved. Each corrected document must state the site as "*Land at Kilkenny Farm, Burford Road, Brize Norton*", identify the correct application number 26/01803/RES, carry an unambiguous revision number and

date, and be accompanied by a complete revised document schedule distinguishing superseded documents from those proposed for approval. The Authority should not approve, or rely upon, any document until this correction and reconciliation exercise is complete.

5.3. This should include correction of any assertion that a technical, landscape or architectural proposal has been developed in response to a specified consultation commitment, and an erroneous assertion that the almshouses evolved through discussions with BNPC, unless the Applicant can identify the relevant commitment, source document, date and the precise proposal said to fulfil it, and can demonstrate that the assertion accurately reflects the outcome of that engagement.

6. Conclusion and requested action

6.1. For the reasons set out above, BNPC objects to the application in its current form and requests that determination be deferred until the Authority is satisfied, following consultation with Oxfordshire County Council as Lead Local Flood Authority, Thames Water and the Environment Agency, that sufficient drainage provision can be delivered in compliance with Outline Conditions 12, 13 and 14.

(a) BNPC notes that the Applicant's Counsel's opinion supports, at its highest, the potential lawfulness of a condition preventing occupation until a satisfactory foul-drainage solution is approved and operational.[27]

(b) The Applicant's Counsel's opinion does not establish that an environmental permit for a private treatment system is feasible or obtainable; that the public sewer network has capacity to serve the development; that the proposed Phase 1 layout is compatible with either a mains-connection or a private-treatment solution; that the drainage system can operate safely when the receiving watercourse is at or near bank-full; that downstream flood risk or water-quality effects are acceptable; or that funded long-term operation and maintenance of any private system can be secured.

(c) BNPC's concern is that the Environment Agency's later 4 December 2025 letter, reference WA/2025/132074/05-L01, stated unequivocally: *"As submitted, it is very unlikely this application will be granted a permit."* [emphasis added]. The quoted material is why BNPC asks for evidence of permit feasibility, capacity and safe operation before the Application is approved in a manner that prejudices those matters.

[27] Richard Banwell, Six Pump Court Temple, Advice Note: Proposed Drainage Strategy, 22 October 2025, application 25/00487/OUT, stated: *"I can foresee no fundamental technical reason why an application for an Environmental Permit would not be successful."*

(d) These outstanding matters are directly material to whether the reserved-matters proposals can responsibly be approved without prejudicing compliance with Outline Conditions 12, 13 and 14.

6.2. In addition, BNPC respectfully requests that the Authority:

(a) require from the Applicant amended documents and further evidence dealing with the matters outlined at headings 4 and 5 above;[28] and

(b) explain in its officer report how each will be resolved.

6.3. BNPC is happy to assist the Authority with any further representations and documentation it is able to supply, should it be required.

Yours faithfully,

Jo Webb

For and on behalf of Brize Norton Parish Council

[28] Corrected, coordinated and scheme-specific application documents, addressing: the design-code, materials, landscaping, park-boundary, play, pond-safety, construction-traffic, foot/cycle-route and infrastructure concerns identified in this representation