



DCO Submission

Consultation Report

Appendix 3

Document 5.1B

On behalf of
Oxfordshire Railfreight Limited

Prepared by Oxalis Planning
March 2026

Appendix 3 –

OxSRFI - Stage 1 'Section 42' consultee responses					
Doc Number	Company / Organisation	Date Received	Comments Summary	Applicant Response	Changes to the scheme
Stage 1 - 1	CPRE, Cherwell District	30/06/2022	<ol style="list-style-type: none"> 1. Positive feedback on consultation process except for concern over accessibility for those without computer 2. Want explanation of how scheme is “strategic” on basis this affects consultation route and determination process 3. Want explanation for scale of development and why it is required, both in terms of need and size (300+ ha) 4. Concern that development results in more road freight – question true purpose of development 5. Question lack of evidence around success of other SRFIs 6. Request more info on Chiltern Lane’s capacity/ability to accommodate level of rail freight traffic proposed 7. Concern over distance to nearest major settlement – limited public transport options, stress on local highway network and associated noise, pollution etc. 8. Concern over labour pool / employees travelling from far afield 9. Request that BNG assessment is shared in entirety using DEFRA 3.0 calculator 	<ol style="list-style-type: none"> 1. Noted - hard copies of materials were available at Cherwell Council offices, Bicester library and Oxford Library. 2. The OxSRFI scheme would deliver a new rail freight interchange and therefore due to the nature of the proposals (rail served warehousing which can accommodate a terminal designed to accommodate trains of up to 775m length , and on a site over 60ha), the scheme is defined as a Nationally Significant Infrastructure Project (NSIP) which determines the process and procedures followed. 3. The scale of development responds to the constraints and opportunities of the Main Site - SRFIs are by their nature large-scale and as a deliver significant environmental and economic benefits. 4. The NPS (2024) states that: "depending on its load, each freight train can remove up to 76 Heavy Goods Vehicles from the road. The rail freight industry resulted in 5.56 million fewer lorry journeys in 2020/21". The OxSRFI scheme will therefore help reduce the number of HGVs on the roads. 5. Other SRFIs - such as East Midlands Gateway and Northampton Gateway - are operational with the rail terminal delivered and operational early in the development of the scheme. 6. The Chiltern Line is part of the Strategic Rail Network with the capacity and ability to accommodate at least 4 trains a day. Further information is provided within the Rail Report. 7. The draft ES Transport Chapter (including the appendices) provides further information about the public transport strategy and the proposals for bus service provision, as well as details about the sustainable travel strategy and proposals for enhanced cycling and pedestrian connections. 8. Cherwell District includes proposals for significant levels of housing growth over the next 20+ years and the OxSRFI site will provide employment opportunities for that growth, as well as to opportunities to help reduce out-commuting from the District. 9. The BNG Assessment is included within the draft ES Ecology Chapter as part statutory consultation. 	
Stage 1 - 2	British Horse Society	04/07/2022	<ol style="list-style-type: none"> 1. Key concern is stopping-up bridleways within and around the development site. 2. Increased vehicle movements (especially HGVs) and subsequent impact on amenity and safety of horse riders and cyclists 3. Note the proposals for new and extended bridleway network very welcome and provide guidance on bridleway width, surfaces, timescales, and road/rail crossing points. 	<ol style="list-style-type: none"> 1. The OxSRFI scheme includes new bridleway links which are explained as part of the sustainable travel strategy. 2. The design of the scheme has considered the impacts on the safety of bridleway and cycleway uses and this is explained in the draft ES Transport Chapter. 3. The details on bridleway width, surfaces, timescales, and road/rail crossing points - will all be confirmed through the detailed design. 	
Stage 1 - 3	Berks, Bucks & Oxon Wildlife Trust	24/06/2022	<ol style="list-style-type: none"> 1. “Object” based on site location being of ‘huge importance to nature’ 2. Specifically, the removal of part (11%) of SSSI and impact on BBOWT Ardley Wood Quarry Nature Reserve 3. Impact on visit members/public experience at nature reserve due to altered landscape, noise, pollution etc. 4. New footpath proposal has potential to cause impact on nature reserve by greater number of visitors e.g. ponds by dogs, disturbance to breeding birds by people and dogs, trampling damage/erosion, litter, dog waste, antisocial behaviour. 5. Advise design change to incorporate buffer of 100m to SSSI 6. Concern over impact to other wildlife sites in proximity in terms of habitat loss, recreational impacts, dust, pollution risk etc. 7. Concern about impact on species, including GCN, birds, bats. 8. Concern about loss of greenfield land and hedgerows 9. Concern over scheme dividing up the Conservation Target Area – refer to policy ESD11 CTAs – advise development is redesigned to reduce built form and create large and wide (750m) area of uninterrupted semi-natural habitat to link together western, eastern, and northern parts of CTA 10. Concern over negative impacts to Catchment Areas 11. Advise a minimum 20% BNG to be sought; consider habitat creation needed to mitigate impact on SSSI as separate to BNG 12. Want reassurance that mitigation and compensation is provided in perpetuity which they define as at least 125 years 13. Concern about impact of lighting on wildlife – invertebrates, bats, birds. Lighting should be minimised. Request full lighting strategy 	<ol style="list-style-type: none"> 1. Mitigation within the scheme will deliver new habitats and at least 10% BNG. 2. Bespoke mitigation for the loss of SSSI is under discussion with NE. Further consideration of impacts to Ardley Wood Quarry Nature Reserve are detailed within the draft ES Ecology Chapter. 3. Impacts on users of the public rights of way network considered within the draft ES Chapter which also outlines mitigation measures to minimise impacts on identified sensitive receptors. 4. Management measures will be included through the detailed design to manage impacts from footpath users. 5. Design of the scheme has set out to minimise impacts on the SSSI but 100m buffer not included due to requirements for rail connection. Measures also set out within the draft ES Ecology Chapter to help mitigate impacts on the SSSI. See also response no. 2 above. 6. Measures set out within the draft ES Ecology Chapter to help mitigate impacts from the proposals on species within close proximity to the site. 7. Measures set out within the draft ES Ecology Chapter to help mitigate impacts from the proposals on protected species. 8. Measures set out within the draft ES Ecology Chapter to help mitigate impacts from the proposals on the site, including hedgerows where it should be noted that the scheme will include the planting of over 13km of new hedgerow. 9. Measures set out within the draft ES Ecology Chapter to help mitigate impacts from the proposals on the CTA. 10. Measures set out within the draft ES Water Chapter to help mitigate impacts from the proposals on the catchment areas, which includes a draft drainage strategy to manage and prevent pollution from hard surfaces. 11. The scheme will deliver at least 10% BNG. 12. Management of the mitigation is set out for 30 years in the HMMP as required by the legislation. 13. Full lighting strategy included as an Appendix to the draft ES Lighting Chapter. 	Yes - BNG strengthened as part of the overall evolution of the scheme from the Stage 1 proposals.

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Stage 1 - 4	Forestry Commission	27/06/2022	<ol style="list-style-type: none"> 1. Have provided info on potential impact of proposed development on woodland 2. Refer to government policy to refuse development resulting in loss or deterioration of irreplaceable habitats inc. ancient woodland 3. Would support a detailed investigation to ascertain whether any additional ancient woodland or veteran trees exist beyond what is included in the Ancient Woodland Inventory 4. Opportunities to strengthen/buffer existing woodland should be considered 5. Welcome opportunity to discuss proposed locations of new woodland 6. Encourage use of UK grown timber in construction as lock in carbon and support management of woodland 	<ol style="list-style-type: none"> 1. Noted. 2. Noted. 3. No ancient woodland within the Application Site and one veteran trees which is not being removed. 4. Measures set out within the draft ES Ecology Chapter to help mitigate impacts on trees and woodland. 5. Additional woodland planting proposed site wide with up to 150,000 new trees proposed. 6. Noted for consideration as part of the detailed design. 	
Stage 1 - 5	Dorchester Living	04/07/2022	<p>General: Not opposed to principle of SRFI, but ‘significant concerns’ over details. Lack of passenger rail station = fundamental concern. ‘No benefits to local community’ as currently proposed. Lack of info justifying location or on alternative sites - recommend that a ‘alternatives sites assessment’ (similar to one produced for West Midlands Rail Freight Interchange) is produced. Scale of proposal and associated impact on Heyford Park = key issue. Unclear on what justifies/informs need for 6.5m sq ft when minimum SRFI size is 60ha - submitted market evidence described as ‘weak’. Concerns over occupation before infrastructure being in place e.g., early occupiers developing alternative travel patterns. Impact on local communities re. scale and noise. ES should provide evidence of market demand for scale of facility.</p> <p>Landscape & visual impacts: No criteria or guidance on how judgement/final conclusions will be made. A ‘Residential visual amenity assessment’ would be ‘expected’. Absence of ZTV and proposed LVIA study area. Several policy and guidance references are omitted, including what are regarded relevant to design principles and good design. ‘Significant concerns’ about proposed landscape buffering – insufficient to hide size and scale of warehousing, thus potential significant adverse impact to Heyford Park. Adverse impact to gateway to Heyford Park from east ‘likely to be seriously detrimental to Heyford Park’. No evidence that mounding/earthwork bunds are characteristic of local landscape – recommend incorporation of naturalistic landforms reflecting local topography. Recommend detailed consideration of design of perimeter bunding adjacent to former Upper Heyford airfield, esp. eastern end of former runway, where it would appear inappropriate and potentially affect legibility of runway as feature in landscape. Recommend Environmental Colour Assessment (ECA) is undertaken. No methodology for cumulative assessment. Recommend consultation with adjacent landowners on landscaping and green infrastructure for alignment .</p>	<p>General: The OxSRFI proposals will not prejudice the delivery of a passenger station at Ardley with further details to be provided as part of the application submission. A draft Alternative Sites Assessment (ASA) which is an appendix to the draft ES (Chapter 2) is provided for the Stage 2 consultation. National policy in the NPS confirms a compelling need for more SRFIs across the country and the extent of development proposed responds to the constraints and opportunities presented by the site. Anticipated phasing and delivery of infrastructure works The proposed programme (which seek to minimise disruption to road-users), are set out with the draft ES Description of Development Chapter and construction impacts have been assessed within the draft ES.</p> <p>Landscape & visual impacts: A draft landscape and visual assessment is included within the draft ES LVIA Chapter which considers the impacts on Heyford Park and sets out how the landscape strategy has been developed to embed earthworks and bunding as part of the mitigation to minimise landscape and visual effects on surrounding receptors. Careful consideration of the bunding at the end of the runway has informed the proposed strategy in this area of the site to enable the historic nature of the runway to be preserved. Further details on the approach to design, including a design code for the detailed design of the scheme, is set out in the draft Design Approach Document which includes a Design Code.</p> <p>Ecology: Further details about the assessment of impacts and mitigation proposed for the CTA, SSSI, habitats, and protected species on and around the site, are set out in the draft ES Ecology Chapter which has been updated from the Stage 1 consultation to reflect the latest surveys. The draft ES includes an updated assessment of the local bat population with Barbastelle trapping surveys also included.</p> <p>Heritage: Further details about the impacts on designated and non-designated heritage assets within and around the site are set out in the draft ES Heritage & Archaeology Chapter. The assessment has been informed by consultation with Historic England and the Conservation Officer at Cherwell District Council.</p> <p>Transport: Anticipated phasing and delivery of infrastructure set out with the draft ES Description of Development Chapter and construction impacts have been assessed within the draft ES. Further details on proposed sustainable travel strategy includes details on new footway/cycleway connections included as an Appendix to the draft ES. Also further details about the proposed bus provision also included within the draft ES. The OxSRFI proposals will not prejudice the delivery of a passenger station at Ardley with further details to be provided as part of the application submission.</p> <p>Rail: Consultation with Network Rail has confirmed capacity for at least 4 trains a day for the site with further details to be set out as part of the application submission. The Chiltern main line is included within the Strategic Rail Freight network as a proposed ‘Diversionary Route’. The OxSRFI proposals will not prejudice the delivery of a passenger station at Ardley with further details to be provided as part of the application submission.</p>	<p>Yes - the draft landscape strategy, particularly the approach to bund heights at the end of the former Heyford Airfield runway.</p>

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		<p>Ecology: Further clarification regarding aquatic ecology and future baseline needed. Issue of air quality impacts remains to be assessed, considered a 'significant gap' in the ecology assessment at this stage. Proposed development removes significant portion of CTA and this impact is not addressed, nor whether the extent of habitat creation/mitigation is sufficient to meet CTA objectives. Assessment is currently incomplete, consequently there is uncertainty around long term impacts of proposed development on SSSI and whether these can be mitigated sufficiently. Inconsistencies in assessment of data for the barbastelle bat and uncertainty as to the reliability of the assessment</p> <p>Heritage: ES does not clearly reflect harm identified to assets - does not reference high level of harm found to listed barn at Ashgrove Farm and other non-designated heritage assets in that location. Heritage Assessment has insufficient regard of setting/significance of RAF Upper Heyford Conservation Area – proposed SRFI would fail to preserve setting and harm significance, which weighs heavily against scheme in planning balance. Proposed development will have worse impact on Grade II listed barn than concluded in Heritage Assessment. Harm to designated 'off-site' heritage assets not appropriately summarised in the Heritage Assessment.</p> <p>Transport: Highway improvements 'generally welcomed'. No clarity over infrastructure delivery timescales – strategic improvements should be in place when needed to mitigate the proposals as they become occupied and operational. Welcome commitment to pedestrian and cycle connections, however recommend 'segregated routes' for compliancy with LTN1/20. Foot/cycleway route alongside unnamed road being replaced by Heyford Park Link Road adds 1.0km to length, recommended direct foot/cycle connection through development. Capacity assessment of proposed bus services should be undertaken. Advise consideration to reopening (or safeguarding of land to facilitate reopening) Ardley rail station for passenger transport –opportunity for employees to travel by sustainable mode of transport, significant benefit for local population, and reduce localised private car trips Rail: SRFI would have 'significant implications for Chiltern' inc. 1. train performance – risk of delay to passenger services (limited opportunities for trains to overtake each other), 2. line capacity for service development – SRFI risks competing for scarce capacity with Chiltern Railways, 3. siting of SRFI – not on a strategic rail freight route – how would trains be routed? 4. Sustainable access for residents/employees – promoters should propose rail-based solution for employees. Consider that the SRFI proposals can be amended to include a new station.</p>		
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<p>Stage 1 - 6</p>	<p>Albion Land</p>	<p>04/07/2022</p>	<p>1. Object on basis they adversely impact Albion Land (AL) proposals at J10 and 'prejudice its delivery' 2. Scoping out of alternative highway works from alternatives assessment 'inappropriate and a highly material omission' 3. AL not provided with relevant methodological data behind ORL's options appraisal/Option 25 - state they require sight of this 4. Transport chapters of WIP PEIR silent on AL application which "seriously undermines approach to options appraisal" – AL's submitted scheme needs to be considered as part of future baseline before preferred highways work option is determined 5. AL consider there is a more appropriate alternative to Option 25, which minimises land take and allows scope for others to increase A43 to dual three lane standard between J10 and A43 – DTA (transport consultants) have prepared a Note on this 6. A full options appraisal including comparison of environmental effects, cumulative effects, should be made available to inform public consultation 7. WIP PEIR should include cumulative effects 8. Recommend ORL undertake a full and proper assessment of reasonable alternatives to the proposed highway works, including an assessment of the options which do not impinge on the AL proposals. Transport Note (DTA on behalf of Albion) 9. No detail on ORL Option comparison process or relevant objectives against which options are measured has been set out. In the absence of this methodological detail, it is premature to identify Option 25 as preferred. 10. Option 25 has paid no regard to live planning applications 11. Option 25 provides excessive additional headroom over and above what is necessary to facilitate the SRFI & other growth expected to come forward</p>	<p>1. The assessment set out within the draft ES Transport Chapter includes work covering the AL proposals. The design of the J10 improvements has been developed to incorporate the AL scheme. 2. As set out in the draft ES Transport Chapter and supporting appendices, several options for the J10 improvement works have been considered. 3. Further detail about the proposed J10 improvement works is included as part of the Stage 2 consultation within the draft ES Transport Chapter. 4. AL proposals considered within the draft ES Transport Chapter with further work ongoing. 5. The design of the J10 improvements has been developed to incorporate the AL scheme which is presented in the draft ES Transport Chapter and supporting Appendices. 6. The assessment work has significantly progressed since the Stage 1 consultation and therefore the Stage 2 consultation includes further details and explanation as part of the consultation material. Further work is also ongoing which will be presented in the application submission. 7. Cumulative Effects are included within the draft ES Chapters, with further work still ongoing which will be presented in the application submission. 8-9. Further highways assessment work, including J10 improvement options, is set out in the draft ES Transport and Appendices. 10. AL proposals considered within the updated assessment work included in the draft ES Chapter. 11. The justification for the proposals set out are included in the draft ES Transport Chapter.</p>	<p>Yes - updates to the J10 improvements include consideration of the Albion Land proposals.</p>
<p>Stage 1 - 7</p>	<p>Middleton Stoney Parish Council</p>	<p>04/07/2022</p>	<p>1. Strongly oppose 'inappropriate development on greenfield site' 2. No conformity with development plan 3. Fails to demonstrate public need 4. Disappointed that they had to request consultation event 5. Repeated requests for evidence (especially re. traffic) not responded to 6. Consider proposed highways mitigation to be unrealistic, flawed, inadequate 7. Believe proposals will exacerbate overcapacity junction in Middleton Stoney (MS); partial relief road proposed not adequate 8. Not convinced by traffic mitigation for east-west flows nor north-south; request that this is examined further, that MS are consulted further on the matter, and request a meeting in early July 2022 9. Claims that HGVs are prevented from routing south towards and through MS are 'flawed' as can do u-turn; automatic number plate recognition camera not adequate to prevent 10. Proposed walking/cycling routes do not 'join up' or connect MS to infrastructure improvements, thus no benefit to MS residents</p>	<p>1. The NPS states there is a compelling need for more SRFIs across the country and that due to their scale and nature it acknowledges that countryside locations may be required to facilitate them. 2. The SRFI proposals are classed as a nationally significant infrastructure project (NSIP) with the NPS being the relevant policy, not the Local Plan. 3. The NPS states there is a compelling need for more SRFIs across the country. 4. The Stage 2 consultation includes an exhibition event at Middleton Stoney. 5. The highways assessment process has been in preparation for many years, in consultation with the local highways authority and National Highways, with more data now being presented publicly as part of the Stage 2 consultation. 6-7. The proposed highways mitigation will help reduce traffic flows through Middleton Stoney centre by 31%. 8. Evidence for the benefits of the highways mitigation strategy are included within the draft ES Transport Chapter. 9. The HGV Routing Strategy will adopt accepted measures to require all HGV traffic to arrive and depart the site to travel via M40 J10 and the new Ardley Bypass. HGVs would be restricted from travelling to and from the south of the site on the B430. 10. The proposed footpath/cycleway/bridleway strategy provides additional routes and connections in the local area which residents of Middleton Stoney will be able to take advantage of.</p>	

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<p>Stage 1 - 8</p>	<p>Mid-Cherwell Neighbourhood Plan Forum</p>	<p>01/07/2022</p>	<ol style="list-style-type: none"> 1. Mainly greenfield site - planning policy favours PDL 2. Conflicts with Local Plan 3. Rural location is unsustainable location 4. Historic landscape damaged forever 5. Loss of agricultural land, particularly given climate crisis and potential food shortages 6. Visual impact of 'enormous' warehouses, esp. at Heyford Park 7. Damage to setting of historic assets at Heyford Park 8. Already other major warehouse developments within 30-mile radius 9. Road scheme will provide over-capacity and encourage more traffic 10. 'Very significant' construction disruption 11. Insufficient public transport connections for employees 12. Cumulative effects arising from Great Wolf leisure complex at Chesterton and other logistics schemes 13. Less than 10% of freight by train = modest reduction in road freight traffic dwarfed by the number of containers going to/from site by road 14. Health impacts – air quality, light, noise 15. Impact on wildlife, flora, fauna, including SSSI 16. Limited capacity of Chiltern Railways line = proposals likely to adversely affect passenger services 	<ol style="list-style-type: none"> 1. The NPS states there is a compelling need for more SRFIs across the country and that due to their scale and nature it acknowledges that countryside locations may be required to facilitate them. 2. The SRFI proposals are classed as a nationally significant infrastructure project (NSIP) with the NPS being the relevant policy, not the Local Plan. 3. The connectivity to the site from M40 J10, as well as the opportunity for improved bus provision and, active travel methods, help to maximise sustainable modes of travel to and from the site. 4. The historic landscape will change but the scheme includes a significant green infrastructure strategy which helps to minimise views. 5. The majority of the site (over 67%) is either poorer quality agricultural land or non-agricultural land. 6-7. Visual impacts and impacts on historic assets at Heyford Park minimised by the proposed landscape strategy, which includes reducing bunds to half heights at the end of the runway to preserve its historic context. 8. The OxSRFI directly addresses a gap within the current SRFI network, meeting a recognised market requirement for a facility capable of serving Oxfordshire, the Greater London conurbation, and parts of the Midlands. 9. The highways scheme and approach has been developed in consultation with the local highways authority and National Highways, in consideration of the proposed OxSRFI scheme and cumulative schemes. Further work is also ongoing at this stage in terms of capacity, which will be presented as part of the application submission. 10. The impacts during the construction process are temporary and are assessed as part of the draft ES Chapters. 11. A public transport strategy is included as an appendix to the draft ES Transport Chapter which sets out the proposed bus service provision for the scheme. 12. The Great Wolf, and other schemes in the vicinity of the site, are included within the cumulative sites assessed as part of the draft ES (see draft Chapter 1 for the full cumulative list of sites). 13. The NPS (2024) states that: "depending on its load, each freight train can remove up to 76 Heavy Goods Vehicles from the road. The rail freight industry resulted in 5.56 million fewer lorry journeys in 2020/21". The OxSRFI scheme will therefore help reduce the number of HGVs on the roads. 14. Measures such as the bus service provision, footway/cycleway/bridleway connections, the lighting strategy and landscape strategy, all included within the proposals will help to mitigate health impacts and provide health benefits where possible. 15. Measures set out within the scheme and explained in the draft ES Ecology Chapter help to mitigate impacts on biodiversity, and help deliver at least 10% BNG. 16. Consultation with Network Rail has confirmed capacity for at least 4 trains a day for the site with further details to be set out as part of the application submission within Rail Reports.. 	<p>Yes - landscape strategy, particularly the approach to bund heights at the end of the former Heyford Airfield runway. Updates to the sustainable transport strategy in terms of the approach to Public Rights of Way have also been updated as work on the scheme has progressed.</p>
<p>Stage 1 - 9</p>	<p>Severn Trent Green Power</p>	<p>30/06/2022</p>	<ul style="list-style-type: none"> • STGP 'significantly affected' by scheme as it requires relocation of their in-vessel composting (IVC) facility. • Limited information provided to date means they cannot determine extent of any adverse impacts on land interests and operational requirements • STGP state they must be able to fulfil operational requirements • Note that IVC facility is a safeguarded waste management facility and has a key role in managing Oxfordshire's waste • Alternative facility must meet specific requirements and be carefully located and designed to minimise adverse amenity impacts • Query whether EA has been consulted on relocation proposals and likelihood of Environmental Permit being granted. • Concern about new footpath/cycleway close to proposed relocated IVC facility - compatibility, mitigation, etc. • Query whether access to new IVC facility could be from the east / more direct rather than north, ask what assessments have been undertaken on this • Concern over routing strategy and whether HGV restrictions apply to IVC facility as they 'should not' • Raise importance of new site being appropriate size given latest environmental regs and operational requirements; currently masterplan shows same footprint – want confirmation that this will change • Would like to understand timescale and phasing, in particular of the proposed relocated IVC facility to ensure continuity of service 	<p>The commercial arrangements for the IVC Facility are that the lease ends in 2030 and the operator will vacate the site at that time.</p>	<p>Yes - the IVC facility will no longer be relocated as part of the OxSRFI proposals.</p>

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Stage 1 - 10	Historic England	29/06/2022	<p>1. Advise consideration is given to potential harm to significance of Upper Heyford Conservation Area</p> <p>2. Refer to historic significance of air base being its central function of providing take-off, landing, and maintenance facilities for military aircraft of cold war period, meaning area immediately around base has historically been kept clear of development, and airbase has been historically isolated, which may be 'eroded' by development</p> <p>3. Suggests there is potential for harm where buildings or earthwork bunds are visible from runway as this detracts from understanding that area would have been kept clear of such obstructions for planes landing/taking off.</p> <p>4. Proposed structures being visible at end of runway from base would 'detract from an understanding of the central importance of the runway'</p> <p>5. Expect photomontages of 'key views' and welcome opportunity to discuss/identify key viewpoints</p>	<p>1. The potential harm to the Upper Heyford Conservation Area has been considered as part of the draft ES Heritage and Archaeology Chapter and it concludes that there will be a minor adverse harm from the proposals.</p> <p>2-4. The design of earthworks and bunds at the end of the runway has been informed by consultation with Historic England and the Conservation Officer at Cherwell District Council, and as a result the bund has been reduced to a half height to preserve historic views from the runway.</p> <p>5. Photomontages of key views, including from the end of the runway, are included in the landscape and visual assessment in the draft ES LVIA Chapter.</p>	Yes - landscape strategy, particularly the approach to bund heights at the end of the former Heyford Airfield runway.
Stage 1 - 11	Upper Heyford Parish	04/07/2022	<p>1. No need for another SRFI given others near by</p> <p>2. Loss of agricultural land</p> <p>3. Not allocated site</p> <p>4. Visual effects on the historic environment</p> <p>5. Roads do not have sufficient capacity</p> <p>6. No evidence rail will work therefore excuse for warehousing</p> <p>7. There is full employment locally</p>	<p>1. The NPS states there is a compelling need for more SRFIs across the country and that due to their scale and nature it acknowledges that countryside locations may be required to facilitate them. The OxSRFI also directly addresses a gap within the current SRFI network, meeting a recognised market requirement for a facility capable of serving Oxfordshire, the Greater London conurbation, and parts of the Midlands.</p> <p>2. The majority of the site (over 90%) is either poorer quality agricultural land or non-agricultural land.</p> <p>3. The SRFI proposals are classed as a nationally significant infrastructure project (NSIP) with the NPS being the relevant policy, not the Local Plan.</p> <p>4. Visual effects on the historic environment have been minimised by the landscape strategy which includes significant earthworks, bunds and planting. Further details about the effects on the historic environment are set out in the draft ES Heritage and Archaeology Chapter.</p> <p>5. The draft ES Transport Chapter sets out the assessment work undertaken so far, including explaining how the mitigation proposals (which includes highways improvement works) will help to increase capacity at key junctions such as M40 J10 and M40 J9., to accommodate the proposed development.</p> <p>6. Consultation with Network Rail has confirmed capacity for at least 4 trains a day for the site with further details to be set out as part of the application submission within Rail Reports.</p> <p>7. The draft ES Socio-Economic Chapter identifies the proposed housing growth in Cherwell and also the issue with out-commuting of residents for work. The OxSRFI proposals will therefore provide job opportunities to accommodate the proposed housing growth and reduce out-commuting in the District.</p>	
Stage 1 - 12	Chesterton Parish	04/07/2022	<p>1. Traffic issues associated with Great Wolf</p> <p>2. No evidence for traffic assumptions</p>	<p>1. The Great Wolf, and other schemes in the vicinity of the site, are included within the cumulative sites assessed as part of the draft ES (see draft Chapter 1 for the full cumulative list of sites).</p> <p>2. Evidence for the traffic assumptions are included in the draft ES Transport Chapter and Appendices.</p>	
Stage 1 - 13	Steeple Aston and Middle Aston	04/07/2022	<p>1. Object to use of greenfield site, landscape damage will be irreversible</p> <p>2. Visual impact of 30m buildings</p> <p>3. Effects on air, noise and light and health and well being</p>	<p>1. The NPS states there is a compelling need for more SRFIs across the country and that due to their scale and nature it acknowledges that countryside locations may be required to facilitate them. The landscape and visual impacts will be minimised through the significant landscape strategy which includes earthworks and bunds, and planting to help minimise views.</p> <p>2. The maximum building heights within the development are proposed at up to 25.5m, but will vary across the proposed scheme (with some less than this). The visual impacts are assessed within the draft ES LVIA Chapter which sets out how the significant landscape strategy will help to minimise views of the scheme from surrounding receptors.</p> <p>3. The effects on light will be minimised through the lighting strategy. In terms of health, measures such as the bus service provision, footway/cycleway/bridleway connections, the lighting strategy and landscape strategy, all included within the proposals will help to mitigate health impacts and provide health benefits where possible. The assessment on air and noise impacts are still be finalised but initial work indicates mitigation will help to minimise impacts on the nearest communities.</p>	
Stage 1 - 14	Lower Heyford Parish	05/07/2022	<p>1. Effect on traffic on the B4030 through the village</p> <p>2. Noise, air and vibration</p>	<p>1. The highways strategy aims to direct traffic to the OxSRFI site via the strategic highways network and along the new Ardley Bypass.</p> <p>2. The assessment on air and noise & vibration impacts are still be finalised but initial work indicates mitigation will help to minimise impacts on the nearest communities.</p>	

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Stage 1 - 15	Kirtlington Parish Council	04/07/2022	<ol style="list-style-type: none"> 1. The CDC Plan does not envisage any development of this scale in the open countryside 2. Loss of agricultural land during a climate crisis and food shortages 3. Warehousing up to 30m high will have major visual impact on communities 4. Major warehousing already 30 miles away in Northamptonshire 5. Disruption will be caused by new roads and junction works 6. An increase in freight running through Kirtlington is untenable - requests freight to use the M40, no southern freight access, APNRs in Kirtlington, improvements to J9 and J10, weight restrictions removed to allow HGVs to access the A34 to Oxford 	<ol style="list-style-type: none"> 1. The NPS states there is a compelling need for more SRFIs across the country and that due to their scale and nature it acknowledges that countryside locations may be required to facilitate them. The SRFI proposals are also classed as a nationally significant infrastructure project (NSIP) with the NPS being the relevant policy, not the Local Plan. 2. The majority of the site (over 90%) is either poorer quality agricultural land or non-agricultural land. 3. The maximum building heights within the development are proposed at up to 25.5m, but will vary across the proposed scheme (with some less than this). The visual impacts are assessed within the draft ES LVIA Chapter which sets out how the significant landscape strategy will help to minimise views of the scheme from surrounding receptors. 4. The OxSRFI will directly addresses a gap within the current SRFI network, meeting a recognised market requirement for a facility capable of serving Oxfordshire, the Greater London conurbation, and parts of the Midlands. 5. The new roads will help move traffic to and from the site to the strategic highways network, and will also help reduce traffic flow through the village centres of Ardley and Middleton Stony. Impacts during the construction process are assessed within the draft ES Chapters. 6. Freight will access/egress the site via the strategic highways network with measures in place, such as APNRs, to prevent HGVs travelling on local roads.
Stage 1 - 16	Royal Mail	30/06/2022	<ol style="list-style-type: none"> 1. Any changes/disruption/closures to main roads around the SRFI may impact Royal Mail's (RM) operations and therefore RM's service delivery targets 2. RM does not wish to stop or delay the SRFI development but wishes to protect its future operations 3. Insufficient highways detail provided in the PEIR/ES at this stage for a full assessment of impacts 4. RM makes 3 requests relating to a Construction Transport Management Plan (CTMP) for dialogue and notification of road closures 	<ol style="list-style-type: none"> 1. Noted. The anticipated phasing of delivery infrastructure works are set out in the draft ES Description of Development Chapter and the proposed programme seeks to minimise disruption to road-users. 2. Noted. 3. Further details on the transport work are included at this stage in the draft ES Transport Chapter and Appendices. Further work is also ongoing and will be presented as part of the application submission. 4. A CTMP will be included as part of the CEMP at the detailed design which can be reviewed by RM at the detailed stage.
Stage 1 - 17	Health & Safety Executive (HSE)	04/07/2022	<ol style="list-style-type: none"> 1. SRFI site is not within the vicinity of any other major hazard installations or pipelines and does not require HSC 2. Consideration given to location of creche re: explosive consultation zones 3. Applicant may wish to contact licensee for further details of the existing license status 	<ol style="list-style-type: none"> 1. Noted. 2. Noted - potential creche located on eastern edge of site as part of the Central Hub. 3. Noted.
Stage 1 - 18	Office of Road & Rail (ORR)	04/07/2022	<ul style="list-style-type: none"> • Response just says no comment 	Noted
Stage 1 - 19	Environment Agency (EA)	20/05/2022	<ul style="list-style-type: none"> • Referred to charged service 	Noted - additional consultation outside the formal Stage 1 process has been undertaken.
Stage 1 - 20	Department for Transport (DfT)	26/05/2022	<ul style="list-style-type: none"> • Land ownership comment wanting further information 	Response sent by the Applicant
Stage 1 - 21	Stratford upon Avon Council	08/07/2022	<ul style="list-style-type: none"> • Response just says no comment 	Noted
Stage 1 - 22	Gloucestershire County Council (Waste)	15/06/2022	<ul style="list-style-type: none"> • Response just says no comment 	Noted
Stage 1 - 23	Oxfordshire LEP	16/06/2022	<ol style="list-style-type: none"> 1. Want to further understand how the developer and employer intends to address local employment and training issues considering the long-standing labour shortages both in the Construction and the Logistics, Manufacturing and Supply Chain industries within Oxfordshire. 2. Would recommend and can support the development of a Community Employment Plan in partnership with the Local Authority, OxLEP and other relevant stakeholder groups to identify training, skills and employment initiatives related to the construction and/or end-use phase of the development 	<ol style="list-style-type: none"> 1-2. The draft ES Socio-Economic Chapter includes proposals for a employment and skills plan - both during construction and operation to help address any training and skill shortages, and will also include measures to help engage the community in employment opportunities.
Stage 1 - 24	Oxfordshire County Council	19/07/2022	See separate sheet	
Stage 1 - 25	Cherwell District Council	22/08/2022	See separate sheet	

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Cherwell District Council response to Stage 1 Consultation			
Date of response - 22/08/2022			
Topic	Comment	Applicant Response (note: references to draft ES Chapters relate to the Stage 2 PIER)	Have any changes been made to the design of the OxSRFI scheme which are relevant to the comment
General Comments	<p>Officers are clear that the proposed development is of unprecedented scale for Cherwell district with the potential to effect significant, long-lasting change and harm to its rural centre. Without prejudice to the Council's future formal position, we are of the view that the development must be planned to be acceptably accommodated in that rural context. At a strategic level, the proposed development has the potential to fundamentally change the character of the heart of the district; change that would be irreversible and long-lasting. This is not an urban area of the district, nor is it presently planned to be. The mitigation of the impacts of the proposed development must appropriate for this rural area. It must be unambiguously demonstrated that the character, appearance, identity, of nearby and affected villages, would be appropriately protected from the outset. Residential and other amenities must be given utmost consideration.</p> <p>In view of the level of strategic and local impact that could be caused, the net social, environmental and economic advantages of the proposed development should be shown to be unequivocally positive. The application to the Planning Inspectorate must be transparent about the range, level and potential mitigation of likely impacts. This must be clearly understood by all parties.</p>	<p>The NPS states there is a compelling need for more SRFIs in the country, and also acknowledges that countryside locations may be required to deliver them due to their locational requirements. The OxSRFI site meets the locational requirements for an SRFI.</p> <p>The OxSRFI site is also proposed in the context of further planned (allocated and/or permitted) and proposed development in the wider Bicester area and M40 J10.</p> <p>The proposed mitigation for the scheme is set out in the draft ES Chapters and has been proposed following an assessment of the environmental impacts. Some of the mitigation measures are embedded into the design such as the significant landscaping scheme, which includes earthworks, bunds and planting to help minimise views from sensitive receptors in the area, and the lighting strategy which will utilise best practice measures to minimise lighting from the scheme. Many of the measures proposed in the CEMP will also be embedded into the construction of the scheme to help reduce impacts such as from noise (through the location of plant) and odour (through an Odour Management Plan). Additional measures will include a bus service provision and an employment and skills plan which will set out how opportunities will be provided for local residents as the scheme develops.</p>	<p>Yes - several changes to the scheme to enhance the landscaping and biodiversity benefits to be delivered which include additional land (within the red line) for BNG and more land for landscaping to the south of the Main Site.</p>
The Purpose of the Proposed Development	<p>Upon submission, and to meet the requirements of the NPS, the application must demonstrably and unequivocally provide confidence that the proposed SRFI would achieve required objectives in terms of modal shift, reduced road freight and highway impacts, transportation efficiency and local, national and regional environmental benefit. Officers consider that proposed development is not required to attract investment to the district, particularly in the logistics sector. Without prejudice to its formal position, the Council would wish there to be certainty that the facility would be a fully functioning interchange to achieve stated objectives and not be a logistics park in its own right. It is considered that the scale of the proposed development and, the highway infrastructure mitigation suggested, would be hugely impactful in this rural area, on an unjustified basis, if this were not the case. The County Council's concerns that use of a rail interchange could effectively become ancillary to highway based logistic operations and cited environmental benefits not being fully realised are ones that are shared. A fully operational interchange must be shown to be deliverable and the logistic operations to be provided, demonstrably integral. It is acknowledged that the terms of the DCO could assist in this regard.</p>	<p>The NPS states there is a compelling need for more SRFIs in the country, and that each freight train can remove up to 76 HGVs from the road. The OxSRFI scheme includes a requirement for a rail connection beyond 2.5million sq. ft. of development.</p> <p>In addition, experience at both the East Midlands Gateway (EMG) and Northampton Gateway (NG) SRFIs is that the rail terminal is operational early in the process. At NG the rail terminal is operational before any warehouses are operational.</p>	

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National Policy and Context	<p>The Summary of Need within the NPS includes references (inter alia) to supporting the national economy and stimulating economic growth, to addressing road congestion, to addressing the impact of national networks on quality of life and environmental factors, to creating capacity on, and resilience of, transport networks (both for freight and non-freight), to address safety problems, enhance the environment or enhance accessibility for non-motorised users.</p> <p>It is considered essential that any application fully demonstrates how it will positively address all the national needs identified having explicit regard to the whether those individual needs would be met at a local, as well as a national and regional level. In the context of the national Summary of Need, and likely local environmental, social and economic effects, the net benefits of the proposed development would need to be significant, realisable and unambiguous.</p> <p>Further, in the context of likely adverse impacts on the local area, it is important that the location and site-specific justification for the proposed facilities is clearly evidenced having regard to the fact that Cherwell district is already a significant attractor of economic investment and growth and which has not necessitated rail integration. The logistics industry is already embedded within the district and likely to expand further before an SRFI could be constructed. It will be important to clearly understand how an SRFI would benefit the national economy, sustainable transportation and the local area over and above what could be achieved without it. This will be important in explaining the proposed development in the context of the national Summary of Need.</p>	<p>The NPS states there is a compelling need for more SRFIs in the country, with further details on the market need set out in the submission of the application. The draft Planning Statement will be finalised prior to the application submission and will set out an assessment of need within the context of the planning balance. From the draft ES prepared for the Stage 2 consultation, it is evident the OxSRFI will deliver a significant number of jobs, investment in the local area, new sustainable travel opportunities and at least 10% BNG. The draft ES Chapters also set out how any environmental effects will be mitigated.</p> <p>The Alternative Sites Assessment (ASA) which is an Appendix to the draft ES (Chapter 2) has assessed several sites within a defined search area along the M40 corridor in Oxfordshire, and demonstrates that the OxSRFI site is the most preferable site within the established search area for the delivery of a SRFI.</p>	
	<p>The Council is also cognisant that the NPS was published in 2014 and prepared over the preceding period. It is therefore important that the very latest understanding of locational need, capacity, demand and supply is presented in the application from a national, regional and local perspective with equitable comparison of potential locations and site options. The latest evidence, strategies and programmes will need to be considered and any material changes in circumstances, since the NPS was prepared, clearly presented.</p> <p>It is appreciated that a new NPS will be a significant consideration and one that might affect your timetable for submission and the need for additional work beforehand.</p>	<p>The NPS was updated in 2024 and states there is a compelling need for more SRFIs throughout the country. The 2024 NPS has informed the preparation of the material prepared for the Stage 2 consultation.</p>	
Regional Context	<p>In presenting the regional context to the proposals, it is important to be specific about the effects of the proposed development on the transit of freight into and out of the region including with and without the SRFI. It is important to fully understand the positive and negative effect on goods traffic by road, including the effect in achieving net zero carbon emission targets. It is important to have a very clear understanding on how this weighs in the balance with other social, environmental and economic effects.</p> <p>It is also important to understand how the development of an SRFI in the proposed location would affect freight transportation logistics in other areas and to be clear on the extent to which the wider rail network would be enhanced or hindered, including with regard to passenger services and the potential for their improvement. This includes having regard to the network relationship with other interchanges, and, as highlighted by the County Council, whether or not they have capacity.</p>	<p>The NPS states that the government is committed to growing rail freight due to the environmental benefits of the sector, with rail freight emitting approximately 76% less CO2 than equivalent transport by road - the OxSRFI scheme will therefore contribution towards the governments targets to reduce CO2 emissions.</p> <p>In terms of the relationship with other SRFIs, the OxSRFI directly addresses a gap within the current SRFI network, meeting a recognised market requirement for a facility capable of serving Oxfordshire, the Greater London conurbation, and parts of the Midlands. The Market Report will also set out more details in relation to market effects, with the report to be included as part of the application submission.</p>	
	<p>Although close to the M40 motorway junction with the A43 (T) and immediately south of the Chiltern main line, the railway line is currently only a passenger service with no freight use. The impact of the proposals on the strategic and local rail network and on strategic and local highway networks needs to be critically assessed.</p>	<p>Consultation with Network Rail has confirmed capacity for at least 4 trains a day for the site with further details to be set out as part of the application submission within Rail Reports.</p>	
	<p>The potential benefits of an SRFI for freight in the proposed location may not be clear cut and the Council will wish to explore this further.</p>	<p>From the draft ES prepared for the Stage 2 consultation, it is evident the OxSRFI will deliver a significant number of jobs, investment in the local area, new sustainable travel opportunities and at least 10% BNG.</p>	
Cherwell Local Plan	<p>It will be necessary to consider the position of the Cherwell Local Plan 2011-2031 (2015) and, to some extent, the adopted Partial Review of that Plan (2020). It will be important for the application to examine how an SRFI in the proposed location would impact on the policies of the Development Plan and their objectives. Additionally, it will be necessary to consider the impact of the proposed development on the development strategy of the district which focuses on its three urban areas – Banbury, Bicester and Kidlington.</p>	<p>The OxSRFI will be assessed against the NPS, however the Planning Statement will also include an appraisal of the Local Plan as a material consideration within the final version which will be part of the application submission.</p>	

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<p>Oxfordshire County Council's Local Transport Connectivity Plan 5 (LTCP5)</p>	<p>The OCC Transport Plan targets include reducing 1 in 4 car trips by 2030; delivering a net-zero transport network by 2040; having zero, or as close as possible, road fatalities or life-changing injuries by 2050. It seeks to reduce the need to travel to discourage individual private vehicle journeys and to make walking, cycling, public and shared transport the 'natural' first choice.</p> <p>The LTCP is supported by a Freight and Logistics Strategy which seeks to support modal shift from road to rail including to reduce the number of HGVs, free up road space, tackle congestion and emissions and create a more efficient road network for all users. It highlights the importance of not affecting the passenger rail network and the lack of spare capacity on Oxfordshire's rail network as a key constraint to increasing the rail freight.</p> <p>From the District Council's perspective as Local Planning Authority, it is important that the proposed development delivers on all relevant aspects of the transport plan and not just the ambition for modal shift to rail. Sustainable transport connectivity to Bicester will be particularly important.</p>	<p>The highways assessment process has been in preparation for many years, in consultation with the local highways authority and National Highways, with more data now being presented publicly as part of the Stage 2 consultation within the draft ES Transport Chapter and its Appendices. Further assessment work is also ongoing and will be presented as part of the final application submission. The detail included for the Stage 2 consultation does include a public transport strategy and strategy for the provision of footways, cycleways and bridleways, with connections to Bicester set out in both strategy as part of the overall approach to sustainable travel as part of the OxSRFI scheme.</p>	<p>Yes - updates to the Sustainable Travel Strategy included within the draft ES Transport Chapter and its Appendices.</p>
<p>Economic Development</p>	<p>Overall, this significant development proposal could be expected to create substantial economic benefits for the national and regional economy. This ought to be detailed in supporting reports, clarifying the local economic benefits alongside mitigation of all socio-enviro effects.</p>	<p>The significant socio-economic benefits to be delivered by the scheme are set out in the draft ES Socio-Economic Chapter and include:</p> <ul style="list-style-type: none"> - Around 9,600 jobs - Significant capital investment in excess of £500million - Added value of £361 million per annum to the local economy - Potential Business Rates revenue of over £48 million per annum 	
	<p>Skills and labour - the site is in a rural location – one that has very low unemployment and a limited supply of labour. Therefore, most urgently, a Community Employment Plan should be prepared for the recruitment of staff including temporarily during the construction phase and for operational staff of completed development.</p> <p>Due to skills taking some years to develop, such a plan should be in place well before planning permission is sought. It is therefore important to know for example:</p> <ol style="list-style-type: none"> a) what links to local schools and colleges have been made (if any)? b) how would an apprenticeship scheme be implemented? c) Is it the intention to import construction labour daily? d) how do the operational jobs match the skills of the current and projected local population? e) what provisions has the applicant already put in place, which gaps remain and what is the mitigation plan? <p>Community priorities - the Council's economic growth aims are reflected in its Business Plan priority to support "An Enterprising economy with strong and vibrant centres". It is therefore key to explain in some depth how local enterprise will be supported and how local (town and village) centres will be enhanced?</p> <p>Supply chains: the scale of the development could also support the development of supply chains. An economic impact report should detail this and help local businesses prepare for opportunities to actively engage with the proposed development.</p>	<p>The draft ES Socio-Economic Chapter sets out an assessment of the OxSRFI proposals against the socio-economic status of the local area and Oxfordshire, with comparison to national data. In terms existing skills, the draft ES Chapter notes that the OxSRFI will provide a range of occupations and skills levels which will be a significant benefit to Cherwell and Oxfordshire.</p> <p>The OxSRFI will also provide for an employment and skills plan for both the construction and operational phases of the development will be secured through requirements at the relevant stages. This will set out in further details for how the scheme will provide local opportunities for training and employment.</p>	
	<p>Warehousing: The term warehousing is used but one might expect this to be 'logistics'. An indication of careers supported, stock turnover, vehicle movements, destinations supported, etc will be key to understand.</p>	<p>The draft ES Socio-Economic Chapter sets out a typical breakdown of jobs in the logistics sector, which would generally include:</p> <ul style="list-style-type: none"> - 8% driving roles. - 25% in office based roles including Information Technology, customer service, sales, and engineering support; - 12% in managerial roles. - 49% warehouse roles. - 6% other roles. 	
	<p>Energy: The indication is for BREEAM 'Excellent' buildings but it is not explained why an 'Outstanding' level is not being proposed. Given the huge development is in open countryside, near to Bicester Garden/Eco Town which has for some years demonstrated good practice encouraged by Government, with energy bills ever increasing, etc an exemplar development, that 'future-proofs' the development to be designed-in from the outset, is expected.</p>	<p>The draft ES Climate Change Chapter sets out a range of measures which will help the OxSRFI scheme to deliver a high-quality development which will play a direct role in enabling the transition to a more sustainable economy with rail freight currently estimated to be approximately 76% more carbon efficient than road freight. The scheme will have a minimum BREEAM target of 'Excellent', whilst targeting 'Outstanding' and a minimum EPC rating of 'A' and targeting A+. The scheme will also design to reduce energy demand and consumption and increase on-site renewable energy through PV panels.</p>	

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	The applicant is invited to engage with the economic growth service as proposals are progressed.	Noted - further engagement opportunities will be explored by the Applicant after the Stage 2 consultation.	
Development and Highways Context	The Council would wish to be satisfied that the proposed development would not hinder the delivery of planned development including that at Heyford Park and Bicester. There will be a need to consider cumulative and synergistic impacts and to have appropriate regard to other potential developments that are being promoted. In particular, there are three applications for planning permission that may be influential: employment development proposals just to the east at Baynards Green, to the southwest, southeast and northeast of the A43/B4100 junction, comprising a total in excess of 550,000sqm of B8 logistics floorspace. Application ref numbers 21/03267/OUT, 21/03268/OUT and 22/01340/OUT.	The proposed developments at M40 J10 are included within the list of cumulative sites in the draft ES Introduction Chapter.	Yes - updates to the J10 improvements to include consideration of the Albion Land proposals.
	The need for, deliverability and delivery of strategic highway interventions would require certainty with all proposals supported by necessary assessment of all impacts. Section 3.5 of the draft Environmental Statement acknowledges that the proposed Ardley Bypass and Middleton Stoney Relief Road are both essential elements necessary to mitigate what would otherwise be unacceptable environmental impacts caused by vastly increased HGV movements on the local highway network. The statutory consultation will need to provide details as to construction access and proposed phasing of development and associated highway infrastructure, which is presently omitted from the ES accompanying the non-statutory consultation.	The indicated phasing of the development is set out in the draft ES Description of Development Chapter.	
	The Parameters Plan appears not to include all existing and proposed pedestrian and cycle routes associated with the approved Heyford Park development. The plan therefore needs updating. The Parameters Plan should also be updated with details of approved and currently proposed developments in the locality at and near to Heyford Park, Chesterton and Bicester. This should include residential proposals on the eastern edge of Heyford Park west of Chilgrove Drive.	The draft Parameters Plan has been updated from the Stage 1 consultation, however, it is not the purpose of the plan to include committed or proposed schemes. The draft ES Chapters included an assessment of cumulative effects from schemes in the vicinity of the OxSRFI (as far as they are progressed), with the assessment to be finalised prior to the application submission.	Yes - updates to the Parameters Plan have been made. Details of updates to the footway/cycleway/bridleway proposals are included within the draft Sustainable Travel Strategy (as an Appendix to the draft ES Transport Chapter).
	In addition to the above speculative B8 logistics proposals, there is a need to take account of the approved leisure developments at Chesterton on part of the golf course (Great Wolf Leisure Resort), at Bicester Sports Association and assorted B1, B2 and B8 employment proposals south of Bicester at Graven Hill, Symmetry Park, Axis J9, Bicester Gateway and alongside the M40 at Junction 9 (Siemens).	The list of committed schemes and sites being assessed as cumulative sites within the ES Chapters comprises: <ul style="list-style-type: none"> - Heyford Park - Bicester Eco-Town (also know as NW Bicester) - Great Wolf leisure resort - David Wilson Homes off Camp Road - Albion and Tritax proposals around M40 J10 - M40 J9 Siemens proposals - Richborough Estates off Camp Road. Other schemes, due to their distance from the scheme or stage of progress, have not been included.	
Travel to Work	From a planning perspective, a clear understanding of travel of work patterns, the sustainability of those travel patterns (including with regard to carbon emissions) must be provided. A comparative assessment of potential locations for the proposed SRFI should involve a proportionate comparison of sustainability credentials and impacts. The County Council has noted that the rural location and likely dispersed workforce mean that the majority of employees are likely to travel to work by private car and the highway infrastructure demand generated by a reasonable assumption of 92% single car occupancy. The County Council's concern that this is '...at odds with the 'Decide and Provide' approach set out in the Oxfordshire Local Transport and Connectivity Plan (LTCP5), which was approved by Cabinet on 21 June 2022' is noted. Officers agree with the County Council's view that the stated ambition of the proposed travel plan is to reduce single occupancy car modal share by 10% is insufficiently ambitious. Given the anticipated very high level of maintained single occupancy car vehicles (even allowing for a 10% modal shift) this development is likely to have significant air quality issues in the locality. The Environmental Statement for the statutory consultation will need to address this issue more rigorously. Deliverable proposals for non-car based connectivity to Bicester will be needed. The application needs to show how the proposed highway infrastructure at the A43(T) at Baynards Green, at Junction 10 of the M40, along the B430, the proposed Ardley Bypass, Middleton Stoney Relief Road and revised Heyford Park access road will relate to/complement existing cycle and pedestrian networks and public transport services linking Bicester and Heyford Park.	The Stage 2 consultation includes a draft Framework Travel Plan as an Appendix to the draft ES Transport Chapter which sets out measures to deliver behaviour change over a 10 year period which will result in more employees travelling to the site by the following methods: <ul style="list-style-type: none"> - Bus - 5% increasing to 8% - Single occupancy car - 82% reducing to 68% - Car sharing - increasing from 10% to 20% - Walking/cycling - increasing from 3% to 4%. The proposed highways improvements works respond to the highways modelling works which have informed the extent of mitigation required to accommodate the OxSRFI scheme.	

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Access to employees / Job Displacement	As this stage of officer's consideration there is anecdotal concern about the availability of potential local employees to meeting the needs of the proposed development. There are similar concerns that an SRFI could draw employees out of job markets in more sustainable travel to work locations. These concerns need to be carefully examined.	The draft ES Socio-Economic Chapter identifies the proposed housing growth in Cherwell (particularly at Heyford Park and around Bicester) and also the issue with the out-commuting of residents for work. The OxSRFI proposals will therefore provide job opportunities to accommodate the proposed housing growth and reduce out-commuting in the District.	
Investment Displacement	Similarly, there are concerns that the proposed development would draw investment away from the district's urban areas, particular at Bicester and reduce the prospect of achieving stated objectives including, in Bicester's case, maximising the opportunity for improving the balance between homes and jobs and reducing out-commuting.	The OxSRFI scheme responds to the compelling need for an increase in SRFIs throughout the country, and also the recognised market requirement for a facility capable of serving Oxfordshire, the Greater London conurbation, and parts of the Midlands. Further details will be provided within the Market Report as part of the application submission.	
Conservation	The conclusion in para 3.78 of the Heritage Impact Statement (which relates to the impacts from the proposed OxSRFI scheme on the setting of the Upper Heyford Conservation Area) is open to further analysis and the views of Historic England will be required. The application site abuts the Conservation Area boundary. The impact of the proposed development and any mitigation measures will require very careful consideration in the context of the duty to preserve or enhance the character and appearance of the Conservation Area. Policy ESD 15 of the Local Plan requires new development to contribute positively to an area's character and identity by creating or reinforcing local distinctiveness and respecting local topography and landscape features, including skylines, valley floors, significant trees, historic boundaries, landmarks, features or views, in particular within designated landscapes, within the Cherwell Valley and within conservation areas and their setting.	Since the Stage 1 consultation the assessment has been informed by further consultation with Historic England and the Conservation Officer at Cherwell District Council, and this has resulted in a proposed change to the draft landscape strategy, particularly the approach to bund heights at the end of the former Heyford Airfield runway which have been reduced to half-height to help preserve the historic nature of views from the runway.	Yes - the draft landscape strategy, and the approach to bund heights at the end of the former Heyford Airfield runway.
Archaeology	The proposed site is located in an area of considerable archaeological interest. The results of on-going archaeological investigations may well need to influence the final locations for planned logistics developments and the precise alignment of associated transport and drainage infrastructure.	Further archaeological investigation and assessment work has progressed since the Stage 1 consultation. This has informed the final design of the proposed highways improvement works, particularly around M40 J10 in consideration of the Iron Age banjo enclosure.	Yes - the design of the proposed highways improvement works around M40 J10 with the proposed Iron Age banjo enclosure.
Landscape Impacts	Policy ESD 13 of the Local Plan seeks to avoid undue visual intrusion into the open countryside, harm to important natural landscape features and topography and development that is inconsistent with local character. It also seeks to protect the setting of settlements, buildings, structures or other landmark features and the historic value of the landscape. The scale of buildings proposed across the SRFI site would be considerable across approximately two square miles of largely flat, rural countryside. Careful building design and landscape mitigation, carried out in compliance with Development Plan policies ESC10, ESC13 and ESC15, will therefore be essential to mitigate significant environmental detriment locally from such bulky, alien structures. Landscape mitigation appears to be in the form of large screening bunds with landscape treatments on top and alongside the proposed roads. More detailed evidence of proposed landscape treatments, including cross-sections will be required to accompany the statutory consultation particularly in respect to boundary edge treatments with existing settlements and the heritage setting of the former Upper Heyford airbase with its associated Scheduled Monuments, listed buildings and Flying Field Conservation Area.	The draft landscape strategy has informed the proposed parameters from the start of the OxSRFI scheme, and includes significant earthworks, bunds and planting to help minimise views from the sensitive receptors (including the former Upper Heyford Airbase). Both the Stage 1 and Stage 2 consultation material includes cross-sections and montages demonstrating landscaping and visual impacts and also form part of the draft ES LVIA Chapter. The above described changes to bund heights at the end of the runway are also proposed.	Yes - the draft landscape strategy, and the approach to bund heights at the end of the former Heyford Airfield runway.
Residential and Recreational Amenity	Serious regard must be given to the amenities of residents in nearby Heyford Park, Ardley and Middleton Stoney, particularly in this rural location. The proximity of properties in Ardley and Middleton Stoney to the proposed bypass and relief roads for those villages is likely to generate significant noise and light pollution, which will need to be far more rigorously addressed and mitigated for in the Environmental Statement for the statutory consultation.	The draft ES Chapters includes an assessment of identified sensitive receptors which, depending on the topic, includes the communities of Heyford Park, Ardley and Middleton Stoney. Further detail will also be included in the ES Chapter once finalised prior to the application submission.	

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<p>Biodiversity Net Gain</p>	<p>The Environmental Statement (para. 6.5.9) states that an Impact Assessment using the DEFRA 3.0 metric has been undertaken and that the proposed development could provide more than a 10% net gain in biodiversity. This would need to be evidenced and tested. However, a proposed development of the scale suggested should be unrestrained in its intent to deliver a strategically significant ‘step-change’ in the achievement of net gain in biodiversity beyond minimum expectations. This should be local and enduring.</p> <p>The application should be accompanied by detailed proposals integral to the development and its landscaping strategy, and which are phased for early delivery and continuous enhancement and maintenance. Simultaneous opportunities for community benefit should also be identified.</p> <p>Parameters Plan 8308-L-12 Rev. S does include ‘Landscape/Green Infrastructure (including strategic landscape mounding, sustainable drainage features, mixed habitats)’ but, there is concern that the measures appear to be proposed primarily as mitigation and not as a planned strategic environmental gain of benefit to the local community.</p> <p>The location of the site within the Ardley & Heyford Conservation Target Area (CTA) means that there is significant potential for biodiversity enhancement. There will also be a need to carefully consider the impact on designated conservation assets. The County Council’s response assists in this regard.</p>	<p>The draft ES Ecology Chapter has been updated for the Stage 2 consultation and includes further details on the BNG assessment, which includes setting out how the scheme will deliver at least 10% BNG.</p> <p>The landscape strategy has been informed by the BNG assessment, and the overall approach to the OxSRFI scheme to deliver environmental benefits which includes measures to enhance and create new habitats as part of the CTA. The proposed rights of way strategy will also enable local residents to access areas which form part of the landscape strategy.</p>	<p>Yes - the development of the landscape strategy to include new areas for biodiversity. Including changes to the red line boundary.</p>
<p>Renewable Energy</p>	<p>Again, officers are of the view that there is very significant potential for on-site renewable energy generation. It is understood that the proposed development would include sustainable energy consumption and production in the interest of achieving net zero carbon emissions and that there would be renewable energy generation and buildings which meet at least BREEM ‘Excellent’ standards i.e in excess of the requirement of policy ESD 3 of the Cherwell Local Plan (2015). It is considered that this will be important to demonstrate in seeking to comply with the expectations of the NPS.</p>	<p>The scheme will have a minimum BREEM target of ‘Excellent’, whilst targeting ‘Outstanding’ and a minimum EPC rating of ‘A’ and targeting A</p>	
<p>Conclusions</p>	<p>In conclusion, officers are cognisant that the proposed development is likely to result in, and be an agent for, very significant change in the rural centre of Cherwell district. The character and setting of the countryside and local villages could change quite dramatically. It is therefore vital that all planning and highway issues are given the utmost and careful consideration.</p>	<p>The OxSRFI scheme is proposed in the context of the NPS stating there is a compelling need for more SRFIs throughout the country. The draft ES Chapters includes an assessment of environmental effects, with measures proposed as required to mitigate impacts.</p>	

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Oxfordshire County Council response to Stage 1 Consultation				
Date of response - 19/07/2022				
Topic	Topic Summary	Comment	Applicant Response (note: references to draft ES Chapters relate to the Stage 2 PIER)	Have any changes been made to the design of the OxSRFI scheme which are relevant to the comment
Key Issues	Need for the development in this location	No information has been provided that clarifies whether the other Interchanges (Daventry, East Midlands Gateway, Hinckley, Northampton Gateway) are at capacity, and nor has there been any consideration of the overlap of the Northampton Gateway with the proposed OxSRFI proposal.	The OxSRFI scheme responds to the compelling need for an increase in SRFIs throughout the country, and also the recognised market requirement for a facility capable of serving Oxfordshire, the Greater London conurbation, and parts of the Midlands. Further details will be provided within the Market Report as part of the application submission.	
	Suitability of the site	Given the proximity of the OxSRFI proposals to M40 J10, the impact on the County's local highway network needs to be assessed alongside Highways England's assessment of the impact on the strategic road network.	The draft ES Transport Chapter includes an assessment of highways impacts on both local roads and the strategic highways network, with further assessment work ongoing which will be presented in the final ES Chapter as part of the application submission.	
		Relocation of the STGP facility - the proposal would need to show that the proposed relocation site is appropriate and sustainable as a replacement for the existing facility.	The commercial arrangements for the IVC Facility are that the lease ends in 2030 and the operator will vacate the site at that time.	Yes - the IVC facility will no longer be relocated as part of the OxSRFI proposals.
		The OCC response requests additional evidence studies that assess the potential impacts of the proposal and the suitability of the site.	The Stage 2 consultation includes updated draft ES Chapters which includes progressed environmental assessment work which has informed the draft parameters for the OxSRFI scheme. Additional reports, such as the Alternative Sites Assessment and Design Approach Document have also been prepared for the Stage 2 consultation.	
	Alternative sites	It is necessary to review whether or not there exists alternative sites that perform as well as, or better than the OxSRFI proposal in meeting the Government's aim of creating a national network of SRFIs. The alternative sites assessment should consider the Graven Hill site (Policy Bicester 2) as allocated in the Cherwell Local Plan under Policy SLE 4 which supports rail freight at Graven Hill	The Alternative Sites Assessment (ASA) which is an Appendix to the draft ES (Chapter 2) has assessed several sites within a defined search area along the M40 corridor in Oxfordshire, and demonstrates that the OxSRFI site is the most preferable site within the established search area for the delivery of a SRFI. The ASA includes the Graven Hill site which is not considered available due to existing allocations and permissions for development at the site.	
	Cumulative impacts	ES to include consideration of other strategic developments coming forward in the local area including the potential cumulative impacts of the SRFI, combined with the other strategic development proposals that are coming forward around Junction 10.	The list of committed schemes and sites being assessed as cumulative sites within the ES Chapters comprises: - Heyford Park - Bicester Eco-Town (also know as NW Bicester) - Great Wolf leisure resort - David Wilson Homes off Camp Road - Albion and Tritax proposals around M40 J10 - M40 J9 Siemens proposals - Richborough Estates off Camp Road. Other schemes, due to their distance from the scheme or stage of progress, have not been included.	
	Oxfordshire Plans & Strategies	Include reference to Oxfordshire Plans and Strategies including Oxfordshire County Council's Local Transport Connectivity Plan 5 (LTCP5) which includes supporting strategies for freight, Oxfordshire Plan 2050, Adopted Cherwell Local Plan, and the emerging Cherwell Local Plan Review.	Given the time lapse since the Stage 1 consultation, these are included within the draft ES Chapters as deemed relevant as a material consideration in policy terms to the OxSRFI scheme.	
Compulsory acquisition	Land owned by OCC	Clarification of the purpose of the new access (Works No 26) and remind the applicant that the land is held for countryside / recreation purposes and contains a variety of Priority Habitats which may not be compatible with the use for which the land is held.	Works 26 relate to the provision of a turning head for Quarry Cottages, and also a bridleway which connects into the existing footpath network. These uses are compatible with the existing countryside / recreation purposes of the land.	
Highways (also comments on rail and need)	Need for the development in this location	There is a risk that rail handling could be a very minor or even negligible part of the operations of what is in effect, a large logistics park with the added benefit of freight handling if desired. If this were to be the case, then it means the environmental benefits of the development are overstated.	The OxSRFI scheme includes a requirement for a rail connection beyond 2.5million sq. ft. of development. In addition, experience at both the East Midlands Gateway (EMG) and Northampton Gateway (NG) SRFIs is that the rail terminal is operational early in the process. At NG the rail terminal is operational before any warehouses are operational.	

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	We have not seen in this consultation much evidence that this location is an optimal place for an SRFI. The Oxfordshire Rail Corridor Study (ORCS) does not seem to identify a need for an SRFI in this area on the Chiltern Line.	The draft Planning Statement underlines the compliance with the requirements of the NPS which sets criteria for SRFIs, and their locations, including with regard to the strategic road and rail networks. The draft ES establishes the suitability of the site in environmental terms. The Alternative Sites Assessment (ASA) which is an Appendix to the draft ES (Chapter 2) has assessed several sites within a defined search area along the M40 corridor in Oxfordshire, and demonstrates that the OxSRFI site is the most preferable site within the established search area for the delivery of a SRFI.	
	It is not yet known which ports would be the origin/destination of containers handled at the site, which suggests that the demand is uncertain. Also, which markets are being served: i) what locations are goods to be loaded on to rail coming from; and ii) where are goods coming off of rail going to? This also impacts traffic modelling assumptions in that there is a danger of under-estimating likely road-based trips (i.e., two-way HGV trips not involving the rail terminal at all) because the rail opportunities are lower at OxSRFI compared to other SRFIs.	The OxSRFI scheme responds to the compelling need for an increase in SRFIs in the country. The Applicant is working with GB Rail Freight (operator) who consider that the OxSRFI site is extremely well located to meet market needs and deliver rail freight services, and expects the terminal to serve Oxfordshire but also to distribute product towards the south-western Midlands, the upper Thames Valley and into the western home counties as well as western parts of London with further details about rail markets provided as part of the application submission. The draft highways assessment work included as part of the draft ES Transport Chapter provides detail in relation to the traffic movement, with further assessment work ongoing.	
	It is also not clear whether the Chiltern Line is or is planned to be a key freight corridor. Two maps published by Network Rail do not show it as such.	The Chiltern main line is included within the Strategic Rail Freight network.	
	SRFIs need to be located on main lines with a loading gauge that can accommodate cost-effective intermodal trains and located close to the strategic highway network and close to major urban conurbations; the latter provides both consumers for the cargo passing through them and a local source of labour. We question whether the site could be considered close to major urban conurbations.	The NPS sets out that SRFIs should ideally be located on a route which can accommodate larger freight wagons, ideally on a route with a gauge clearance of W8 or more, or capable of enhancement to a suitable gauge. The NPS sets out that SRFIs should ideally be located close to the markets they serve, but also recognises countryside locations will usually be required. SRFIs must be in locations on both strategic road and rail networks. The site is strategically located adjacent to the Chiltern main line and south of the M40 J10, with major growth proposed at Heyford Park and Bicester, and access to both Birmingham and the underserved London market. The site is well located with regard to connectivity to and proximity to urban conurbations.	
	The selection of this site could be pre-empting the evidence base being developed by Network Rail and National Highways as part of their Solent to the Midlands Multimodal Freight Strategy.	The OxSRFI scheme responds to the compelling need for an increase in SRFIs throughout the country and does not conflict with the Solent to the Midlands Multimodal Freight Strategy.	
	OCC request that the Rail Report is provided as soon as possible.	The Stage 2 consultation includes two rail reports as part of the consultation material.	
Alternative sites	No information is provided on alternative sites. Detail should be provided in the next consultation, including the Graven Hill site (Policy Bicester 2)	The Alternative Sites Assessment (ASA) which is an Appendix to the draft ES (Chapter 2) has assessed several sites within a defined search area along the M40 corridor in Oxfordshire, and demonstrates that the OxSRFI site is the most preferable site within the established search area for the delivery of a SRFI. The ASA includes the Graven Hill site which is not considered available due to existing allocations and permissions for development at the site.	
Possible future passenger station	Whilst there are no policies currently regarding the reopening of Ardley railway station, we reiterate our request that the proposals do not rule out this possibility as a future opportunity. We have heard that the plans do not affect the footprint of the former Ardley railway station, but further information should be provided to demonstrate how a passenger station could be accommodated alongside the freight terminal. We further request that the land required, including access, is safeguarded.	The OxSRFI scheme does not prejudice the delivery of a passenger station at Ardley.	
Significant new road building	The embedded infrastructure proposed is very significant. Free flow links are being provided at M40 J10 which will provide capacity over and above that required to mitigate the impact of the development, and there is a risk that provision of additional capacity will induce additional car journeys.	The highways assessment process has been in preparation for many years, in consultation with the local highways authority and National Highways, with more data now being presented publicly as part of the Stage 2 consultation within the draft ES Transport Chapter and its Appendices. Further assessment work is also ongoing and will be presented as part of the final application submission. The detail included for the Stage 2 consultation includes amended improvement works for M40 J10 to address identified capacity issues.	Yes - amended proposals for M40 J10.
Dominance of car travel	The rural location and likely dispersed workforce mean that the majority of employees are likely to travel to work by private car (92%) - this leads to an assumption of need for the significant additional highway infrastructure proposed, which is at odds with the 'Decide and Provide' approach. The ambition of the travel plan is to reduce single occupancy car modal share by 10%, is insufficiently ambitious when set against the headline target of the emerging LTCP5 to remove 1 out of every 4 current car trips in Oxfordshire by 2030 and 1 out of every 3 by 2040.	The Stage 2 consultation includes a draft Framework Travel Plan as an Appendix to the draft ES Transport Chapter which sets out measures to deliver behaviour change over a 10 year period which will result in more employees travelling to the site by the following methods: - Bus - 5% increasing to 8% - Single occupancy car - 82% reducing to 68% - Car sharing - increasing from 10% to 20% - Walking/cycling - increasing from 3% to 4%. The proposed highways improvements works respond to the highways modelling works which have informed the extent of mitigation required to accommodate the OxSRFI scheme.	

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Need for further mitigation	It should be noted that the need for off-site mitigation measures may be generated by a range of environmental factors rather than solely for highway safety or to relieve congestion. The applicant should carry out local engagement on any proposed schemes.	The highways assessment process has been in preparation for many years, in consultation with the local highways authority and National Highways, with more data now being presented publicly as part of the Stage 2 consultation within the draft ES Transport Chapter and its Appendices. Further assessment work is also ongoing and will be presented as part of the final application submission. The detail included for the Stage 2 consultation includes off-site highways works which are explained within the draft ES Transport Chapter. The Stage 2 consultation provides an opportunity for engagement with local communities about these proposals. The off-site junctions where improvement works are proposed comprise: junction of Camp Road and Chilgrove Drive, Middleton Road, the B430 west of the Main Site, Quarry Cottages, Middleton Stoney Crossroads and Aves Ditch, and potential works potential works to the junction of Empire Drive with the B4030 and to the B4030/A4095 roundabout at Middleton Stoney Road and Vendee Drive west of Bicester.	Yes - the red line has been extended to include proposed improvement works at the identified off-site junctions.
	OCC will seek Requirements and a S106 agreement as necessary - mitigation is likely to include contributions to provide bus services, travel plan and travel plan measures, schemes to mitigate off site traffic impacts, and improvements to public rights of way in the vicinity.	The measures are acknowledged and are reflected in the draft DCO which is included as part of the Stage 2 consultation.	
Public rights of way and non-motorised user connectivity	There is not yet any walking, cycling and horse-riding assessment and review - this must be carried out. A commitment to providing wide green access and landscape corridors, better connectivity, and full year-round accessibility for all NMUs for new and upgraded routes needs to be built in at early stages, along with provision for ongoing maintenance and replacement costs. There also needs to be a contribution towards offsite (beyond DCO limits) mitigation measures focused on NMu safety, accessibility, and connectivity. The detail of crossings, underpasses, diversions, widths, surfaces, and furniture needs to be agreed at earliest stages. Likewise, for potential environmental and amenity improvements like seating and viewing points, information panels, landscape, biodiversity, and habitat enhancements. Engagement with OCC required on these. Additional measures are required where bridges separate bridleway routes, requiring NMUs to join the carriageway to cross the bridge (subject to ongoing discussions). Details of proposed underpasses will be required.	A sustainable travel strategy is included as an appendix to the draft ES Transport Chapter with details of the proposed footway/cycleway/bridleway scheme.	Yes - updated detail for footway/cycleway/bridleway proposals are included within the draft Sustainable Travel Strategy (as an Appendix to the draft ES Transport Chapter).
Vehicle charging capacity & local power generation	Trials are underway of alternative ways of powering HGVs including pure battery; hydrogen; and power from overhead lines picked up by a pantograph – the ‘electrified road’. Assuming a need for HGVs to ‘refuel’ at the SRFI, this will have an implication for energy supplies and space at the operational site. It should also be noted that the Oxfordshire Electric Vehicles Infrastructure Strategy (OEVIS) requires at least 25% of all new vehicle parking spaces to be provided with electric charging – this is an increase from the 10% mentioned in the consultation documents. Public transport to and from the site will also be electrified, adding to the charging load. It may be that additional locally generated, renewable power with battery storage and smart network connectivity is needed to supplement the planned PV cell installation for warehouse and building base needs, to meet the needs of the electric charging load described above.	The detailed design of the scheme, which is secured through requirements, will include details in relation to EV charging for the warehouses and HGV parking area.	
Communications	Will the small-scale infrastructure required to support 5G and 6G in the future be in place	The detailed design of the scheme, which is secured through requirements, will include details in relation to communications (see draft DCO requirement 9)	
Monitoring sensors	Provision for monitoring sensors should be considered for counts of movement for all types of transport modes including cycling and walking. Also, for air quality and noise.	The scheme includes the provision for ANPR cameras to prevent HGVs travelling south along the B430. No additional transport specific cameras are proposed at this stage.	
Changes in modes of transport	Consideration should be given to the impact of changes in the modes of transport that are expected, such as connected and autonomous vehicles (CAVs) and unmanned aerial vehicles (UAVs). Targets in the Oxfordshire Local Transport and Connectivity Plan (LTCP) are to replace or remove 1 out of every 4 car trips in Oxfordshire by 2030 and 1 out of every 3 by 2040. Therefore, consideration should be made for space initially allocated for private car parking to be flexible enough to be repurposed in the longer term.	The highways assessment process has been in preparation for many years, in consultation with the local highways authority and National Highways, which has informed the methodology and modelling work undertaken. Therefore all relevant measures have been taken into consideration as part of the highways assessment work undertaken prior to the Stage 2 consultation.	

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	Table 1 comments	<p>Comments within Table 1 on the draft plans and draft ES chapter include several comments which are repeated elsewhere within the OCC response. For ease of reference the comments are listed as topics below:</p> <ul style="list-style-type: none"> - Highways works, transport and public rights of way - Alternatives - Air quality - Noise and vibration - Ecology and arboriculture - Lighting 	<p>Highways - the highways assessment process has been in preparation for many years, in consultation with the local highways authority and National Highways (through the Transport Working Group (TWG)), and has progressed considerably since the Stage 1 consultation. The assessment work has informed the design and layout of the highways work proposed. In addition, work with the TWG has informed the sustainable travel strategy which includes the proposed bus provision and rights of way strategy with draft proposals included within the Stage 2 consultation. The draft ES Transport Chapter and its Appendices includes further details about the assessment work and highways and sustainable transport proposals, which includes an explanation for how consultation with OCC has informed the highways design. Further assessment work is also ongoing and will be presented as part of the final application submission.</p> <p>Alternatives - the ASA is provided as part of the Stage 2 consultation material as an Appendix to the draft ES (Chapter 2).</p> <p>Air quality - assessment work is ongoing with the final assessment provided as part of the application submission.</p> <p>Noise - assessment work is ongoing with the final assessment provided as part of the application submission, with the Stage 2 consultation providing a further opportunity for engagement by consultees.</p> <p>Ecology and arboriculture - the OxSRFI scheme will be assessed against the NPS with consideration given to relevant local policies and guidance.</p> <p>Lighting - the draft ES Chapter includes an assessment of highways lighting.</p>	<p>Yes - in terms of the highways works proposed, and also the ecology/arboricultural mitigation proposed and included to deliver at least 10% BNG.</p>
Archaeological impact		<p>A geophysical survey was not able to investigate the full extent of the site due to ecological constraints and a further programme of evaluation is likely to be required in these areas ahead of determination. Fieldwork for the evaluation of the accessible parts of the main area has been completed but the report has not yet been completed and has not been agreed with County Archaeological Services. Once this evaluation report has been agreed then it will be used to assess the significance of these sites in order to provide appropriate advice as to whether or not the impact of this development on the significance of these sites is acceptable. This should also inform the ES chapter.</p> <p>A programme of archaeological evaluation will need to be undertaken along all of the proposed highways works in advance of the granting of any permission for this site.</p>	<p>Further archaeological investigation work has been undertaken, including within the proposed highways works areas and in correspondence with the County Archaeologist, since the Stage 1 consultation and this is set out within the draft ES Heritage and Archaeology Chapter. This work has informed the progress of the draft ES Chapter and the assessment of effects and proposed mitigation. Further archaeological investigation work will be controlled through draft DCO requirement 14.</p>	
Drainage		<p>The detailed design of the surface water drainage scheme will need to be submitted to and approved by the County Council (LLFA) in order to ensure it provides adequate mitigation.</p>	<p>The detailed design of the scheme, which is secured through requirements, will include details in relation to the drainage strategy for the whole site and individual development plots. An outline strategy is however included as part of the draft ES Water Chapter for the Stage 2 consultation. The detailed design of the drainage scheme will be controlled through draft DCO requirement 21.</p>	
Public Health		<p>While it is welcomed that transport methods alternative to the private car will be enabled, it is important that this infrastructure is promoted through a range of activation methods. This may be in the form of workplace travel plans, the provision of secure cycle storage, lockers, and shower facilities, and with careful consideration as to the bus routes which will use this route so as to maximise the ability for users of the proposed site to reach home destinations. Given the proximity of the site to residential areas at Heyford Park, Ardley and Middleton Stoney, specific cycle routes should be provided to support sustainable active travel from these locations to the site for work purposes. Due to the rural location of the proposed development, there will naturally be a lack of major transport infrastructure that would normally be present in towns and cities, so it is vital that opportunities to travel sustainably to the site are provided. A site management plan should consider how the site will manage and maintain public rights of way within the site and which connect to it; these include legible signage, vegetation cutback and other hazard removal.</p>	<p>The Stage 2 consultation includes a draft Framework Travel Plan as an Appendix to the draft ES Transport Chapter which sets out measures to deliver behaviour change over a 10 year period which will result in more employees travelling to the site by the following methods:</p> <ul style="list-style-type: none"> - Bus - 5% increasing to 8% - Single occupancy car - 82% reducing to 68% - Car sharing - increasing from 10% to 20% - Walking/cycling - increasing from 3% to 4%. <p>The detail included for the Stage 2 consultation does include a public transport strategy and strategy for the provision of footways, cycleways and bridleways, with connections to Bicester set out in both strategy as part of the overall approach to sustainable travel as part of the OxSRFI scheme. Please also note that the sustainable transport strategy will be controlled through draft DCO requirement 6.</p>	
		<p>The new landscaping and planting should carefully consider areas for people to stop and rest, especially when walking or cycling considerable distances to and from the site. This should tie in with strategic planting to deliver shade and cooling from the sun on hot days. Planting within the site should consider the mental wellbeing of those who might use the area during breaks. This should also include canopy shading and shrubs.</p>	<p>The detailed design of the scheme, which is secured through requirements, will include details in relation to the landscaping scheme including planting details.</p>	
		<p>A detailed assessment of operational phase road traffic emissions on local air quality should be undertaken to identify any potential impact on the nearest housing units to the development (i.e., Heyford Park). It is noted that a construction phase dust assessment will be included; a construction phase dust management plan should also be provided.</p>	<p>The draft ES Air Quality Chapter assesses impacts from the OxSRFI scheme on the identified nearest sensitive receptors. Assessment work also remains ongoing with the final ES Chapter provided for the application submission.</p>	
		<p>There should be a sufficient number of EV charging points to meet future demand and charge points should be free to use in order to make electric vehicle ownership more appealing.</p>	<p>The detailed design of the scheme, which is secured through requirements, will include details in relation to EV charging facilities - please see draft DCO requirement 9.</p>	

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		A Health Impact Assessment will need to be completed as part of the planning application. The results of the HIA should be reported in a specific healthy place shaping chapter.	A draft HIA is included as an Appendix to the draft ES Socio-Economic Chapter, with the assessment to be finalised prior to the application submission.		
Minerals & Waste	General Comments	The proposal includes an alternative site for the Severn Trent Green Waste facility, but the proposal would need to show that this proposed site is appropriate and sustainable as a replacement for the existing facility.	The commercial arrangements for the IVC Facility are that the lease ends in 2030 and the operator will vacate the site at that time.	Yes - the IVC facility will no longer be relocated as part of the OxSRFI proposals.	
		The site is in close proximity to an existing Household Waste Recycling Centre, Energy from Waste Plant, and a former landfill site to the east. The proposal should demonstrate that it would not prevent or prejudice the operation of the Household Waste Recycling Centre or the EfW plant.	The proposed OxSRFI scheme will not prevent or prejudice the operation of the Household Waste Recycling Centre or the EfW plant.		
		The site is within a mineral safeguarded area (crushed rock) (Policy M8). The site is not an allocated site, there is no proposal to extract the mineral prior to the development taking place, and so it is necessary to demonstrate how the development outweighs the mineral considerations.	A Minerals Assessment is included as an Appendix to the draft ES Ground Chapter with further details also included in the draft ES Waste Chapter which states that the exact source of materials required for the construction of the Proposed Development cannot be defined at this stage, however, materials for construction would be sourced locally where practicable by the contractor.		
	ES Chapter comments	13.2.15 - This refers to a “minimal level” of mineral being required. This is a large site and so even a minimal level could be significant. If the proposal is to use mineral from the cut and fill operations, it should be included in the ES as this would be relevant to Policy M8.			
		13.2.51 - If climate change is not going to be covered in this part of the ES it should reference where it has been considered.	The Stage 2 consultation includes a draft ES Climate Change Chapter.		
		13.2.56 - It would be worth mentioning in this section that inert waste used in the restoration of an unrestored quarry is considered to be recovery. This should be used in preference to landfill at a site that does not require restoration.	Noted.		
		13.3.13 - In the interest of reducing the transport effects on climate change, proximity should be considered in the waste management options.	A Site Waste Management Plan will be secured through requirements draft DCO requirement 31 and prepared at the detailed stage.		
		13.3.28 - The policy in the OMWCS that relates to the disposal of wastewater and sewage sludge is policy W10, so this should be referred to in the OMWCS section.	Wastewater is referred to in the draft ES Water Chapter.		
		13.4.2 - Policy W11 of the OMWCS safeguards existing waste facilities such as the Severn Trent IVC facility. This should be referred to here and in the OMWCS section.	The commercial arrangements for the IVC Facility are that the lease ends in 2030 and the operator will vacate the site at that time.	Yes - the IVC facility will no longer be relocated as part of the OxSRFI proposals.	
		13.4.8 - The latest Local Aggregates Assessment (2021) should be used. Table 13.14 - This refers to the District Council as the Local Authority. In this case it is the County Council that is the Local Planning Authority, and it would therefore be sensible to refer to the County authority in each case. Buckinghamshire is now a unitary authority. The exception in Oxfordshire’s case is the Blenheim Palace permission which was granted by West Oxfordshire District Council. In all cases, the latest information from the Authority Monitoring Reports, and the Waste Data Interrogator should be used. 13.4.17 - The review of waste management facilities is restricted to the two Oxfordshire Districts of Cherwell and West Oxfordshire. However, some areas of South Oxfordshire are closer to the proposed site than parts of West Oxfordshire. Waste is in any event a County Matter, so it would more sense to refer to counties with or without a radius around the SRFI site.	The draft ES Water Chapter has been updated to refer to the relevant policies, guidance and local authorities for the OxSRFI scheme. This includes an assessment of the relevant waste facilities.		
13.6.28 - Depletion of finite mineral resources is also caused by sterilisation. This proposal would cause a loss of workable mineral deposits, and this should be considered in the ES.	A Minerals Assessment is included as an Appendix to the draft ES Ground Chapter which concludes that by retaining mineral resources on site and ensuring that additional demand is not put on external resources that can be sourced on site there will be minor adverse effect on loss of mineral resources based on a minor effect magnitude of low sensitivity.				

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Ecology	Habitats	<p>It is estimated that about 1.36ha (approx. 11%) of the Ardley Cutting & Quarry Site SSSI will be permanently lost and another 1.46ha subject to temporary disturbance. It may also be adversely affected by construction impacts such as dust, noise and pollution. Further detailed botanical surveys are planned for this summer.</p> <p>The main part of the application area lies almost entirely within the Ardley & Heyford Conservation Target Area (CTA). There will also be some habitat loss from Ardley Fields Quarry Local Wildlife Site (LWS).</p> <p>Ardley Road Verge Nature Reserve (RVNR) lies adjacent to the main site and will be partly impacted (although none of the grassland itself will be lost) by the creation of a new footpath/cycleway. Therefore, this RVNR is considered to still be of County level importance.</p> <p>Within the main application site, none of the hedgerows were found to meet the criteria to be classified as important under the Hedgerow Regulations 1997. However, three hedgerows potentially impacted by the highways works meet the criteria.</p>		
	Species	<p>There are three great crested newt (GCN) metapopulations around the main site, one of which spans the railway line, and the works have the potential to cause loss of habitat and disrupt migration to breeding ponds. Further survey works in 2022 will confirm whether or not a fourth GCN metapopulation is present within the area of the Ardley bypass.</p>	<p>Further surveys on habitats and protected species have been undertaken since the Stage 1 consultation and have informed updates to the draft Parameters Plan and Illustrative Masterplan included within the Stage 2 consultation. Further details on the results of these surveys are included within the draft ES Ecology Chapter, within some seasonal surveys still ongoing which will be finalised and included in the application submission.</p>	<p>Yes - the ecology surveys have informed the design of the OxSRFI scheme and also helped to inform additional land being included within the red line to incorporate additional land for BNG.</p>
		<p>Two bat roosts have been confirmed at a farmhouse and outbuilding, both of which are proposed for retention and refurbishment; therefore, a licence will be required to undertake these works. No tree roosts have yet been confirmed. Small populations of reptiles (common lizard, grass snake and slow worm) were found within the main site. The railway embankments could not be surveyed but provide excellent habitat for reptiles and they will almost certainly be present in and around the SSSI in good numbers. Low numbers will likely also be present in the highway works areas.</p>		
		<p>The breeding bird assemblage was as expected for the habitats on site, with the exception of spotted flycatcher, which if confirmed breeding makes it of County level importance for the species. Two probable barn owl nesting/roosting sites will be lost. The overwintering bird assemblage was of local value, with the exception of skylark and yellowhammer, which were recorded in high numbers. If these kinds of numbers are recorded in three out of the past five years, the main site could meet the criteria for a LWS for wintering birds (this data is not yet available). These two species are associated with open field habitats and as such the proposed development will have a significant impact on them.</p>		
		<p>The badger survey report was not available to comment on, but they will be present within the main site</p>		
		<p>The grassland and scrub habitats within the Ardley Quarry & Cutting SSSI provide excellent habitat for invertebrates, most notably the rare Duke of Burgundy butterfly; further butterfly surveys are scheduled for this summer.</p>		
	<p>No evidence of otter or water vole was found on the Gaggles brook.</p>			
BNG	<p>The ES states that an Impact Assessment using the DEFRA 3.0 metric has been carried out, which demonstrated the scheme could deliver more than a 10% net gain. The calculations have not been made available and as such I cannot comment further on this aspect. Once all the additional surveys have been carried out this year the Impact Assessment should be re-calculated using the latest 3.1 version of the metric.</p>	<p>An updated BNG assessment has been undertaken using the Statutory Biodiversity Metric calculator and which demonstrates the OxSRFI will deliver at least 10% BNG.</p>		
Mitigation / compensation	<p>Since updated/further surveys are required for many of the species, the existing mitigation proposals are fairly general. They will be required for bats, badgers, GCN, birds, reptiles as well as the SSSI grassland and also possibly invertebrates. A Farmland Bird Strategy is proposed. Measures to prevent and reduce construction and long-term impacts on the SSSI and nearby LWS's will need to be covered in greater detail in a Construction and Environment Management Plan (CEMP).</p> <p>Overall, from the information currently available, I cannot say whether the mitigation and compensation are sufficient and/or appropriate.</p>	<p>Further surveys on habitats and protected species have been undertaken since the Stage 1 consultation and these have informed the proposed mitigation measures which are set out in the draft ES Ecology Chapter (this also includes measures set out in the draft CEMP).</p>		
Landscape & Visual Chapter	<p>a) The proposed assessment criteria in appendix 7.1 look rather simplistic and might not provide sufficient detail to allow and sufficiently nuanced assessment of the scheme.</p>	<p>The draft ES LVIA Chapter has been updated to provide further details on the assessment methodology and the study area.</p>		

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	<p>b) The methodology does not include information on the method to be used for photography and for photomontages. Visualisations should be in accordance with the Landscape Institute Technical Note TGN 06/19 - Visual Representation of Development Proposals.</p>		
	<p>c) The LVIA chapter does so far not include any information on the extent of the study area considered as part of this assessment. This should be determined by a computer generated ZTV (Zone of Theoretical Visibility), which should be refined by site visits. Without this it is difficult to judge whether the appropriateness of the proposed viewpoints outlined on the viewpoint plan</p>		
	<p>d) The viewpoints plan includes some viewpoints to assess the highway infrastructure but the Draft LVIA seems to predominantly focus on the main site. The varying road infrastructure schemes associated with this development are major developments in their own right and will need to be adequately assessed in landscape and visual terms. More viewpoints might potentially be required.</p>	<p>The draft ES LVIA Chapter has been updated to provide further details on the selected viewpoints.</p>	
	<p>e) Proposed mitigation measures include the integration of some of the existing mature vegetation into the scheme and the provision of 132ha (44% of the main site) of land for landscaping and green infrastructure including landscape treatment is focussed on screening the site with bunds and/or vegetation. Although there are some green corridors through the site, they look rather narrow and will be dwarfed by the scale of the buildings. I have not been able to find information on the treatment of these, but the Illustrative Masterplan suggests that landscaping might be rather formal and therefore unlikely to offer the ecological and visual benefits one would hope to see considering the site's context of nature conservation designations.</p>	<p>The detailed design of the scheme, which is secured through requirements, will include details in relation to the landscaping scheme including planting details for the on-plot landscaping proposals.</p>	<p>Yes - the landscape scheme has been updated since Stage 1 to include additional land for landscape greenspace and BNG.</p>
	<p>f) The assessment of construction and operational effects in Draft LVIA is unspecific at this stage making it difficult to get a sense of the impact of the development in views. However, it recognises that the landscape character of the site will permanently change, which I would agree with.</p>	<p>The draft ES LVIA Chapter has been updated to provide further details in relation to the impact on views from the proposed development.</p>	
	<p>g) & h) I note that lighting is addressed separately but the impacts of lighting should also be considered in the context of the LVIA. The LVIA does currently only assess impacts on landscape character, characteristic elements, and views but it should also assess effects on tranquillity and dark skies. There is a lot of development in the area - the LVIA should take account of indirect, secondary, and cumulative effects. As such the LVIA should also assess the effects on tranquillity caused by increases in car and HGV movements in the wider area.</p>	<p>The assessment on lighting is included within the draft ES Lighting Chapter.</p>	
Illustrative Masterplan	<p>I have not been able to find information on the size, height, and design of the buildings but the Illustrative Masterplan and consultation boards suggest that the development is of a design, bulk and height that is not in keeping with the surrounding landscape character and is expected to be visible in the landscape. The proposed highway infrastructure works are also substantive and are major developments in their own right. Both the main site and highway works will by their scale and nature have an urbanising major effect on this rural landscape character. Although other large developments such as Dewars Quarry and ERF exist in the vicinity, these developments are in comparison smaller and of a temporary nature, which will assist in reducing their impact in landscape character and visual terms in the long-term.</p>	<p>The draft Parameters Plan states that the maximum height of buildings will be 25.5m. The draft ES LVIA Chapter sets out that the design approach adopted seeks to assimilate the proposed development as appropriately and robustly as possible, and to minimise and mitigate the landscape and visual effects as far as practicable.</p>	<p>Yes - several changes to the scheme to enhance the landscaping and biodiversity benefits to be delivered which include additional land (within the red line) for BNG and more land for landscaping to the south of the Main Site.</p>
	<p>The Illustrative Masterplan suggests that the development is proposed to be screened by vegetated bunds. This is a rather utilitarian approach to screening as bunds are often uncharacteristic, engineered features in the landscape that are not in keeping with the landscape character. I am unconvinced about the appropriateness and effectiveness of these, and I expect parts of the large warehouse buildings to be remain visible in views.</p>	<p>The draft ES LVIA Chapter includes draft cross-sections to help inform the assessment of landscape and visual effects. The earthworks and bunds have been designed to help minimise view of the proposed development.</p>	
	<p>The draft layout proposes to retain existing mature vegetation within the site, which is welcomed but these areas are dwarfed by the development. The briefing document suggest that 44% of landscape and green infrastructure will be provided but it is unclear what areas are included in this calculation.</p>	<p>The draft ES LVIA Chapter has been updated to provide further details in relation to the extent of green infrastructure provided which now account for over 50% of the scheme.</p>	

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		<p>Overall, the impression is that the landscape proposals focus on screening bunds and landscape treatments along the roads but limited green infrastructure within the site and the wider area to provide comprehensive measures that provide ecological connectivity and offer landscape improvements. For a scheme of this size and importance I would also expect green roofs and green walls as well as solar panels to be an integral part of the design. Green roofs and walls could not only assist in reducing the impact of the development in views but could also deliver benefits for biodiversity, Sustainable Urban Drainage (SUDS) and energy efficiency.</p>	<p>The draft OxSRFI scheme includes significant levels of green space within the site which includes the planting of over 150,000 new native trees and 13km of new hedgerow, as well as over delivering at least 10% BNG. The scheme will also include measures as part of the sustainable drainage strategy which will be secured through requirements and confirmed at the detailed design stage of the scheme.</p>	
		<p>It is unclear whether or how environmental considerations have influenced the design, but the draft layout suggests a planting approach typically associated with business parks with little regard to existing landscape character. Whilst the development might not affect any landscape designations the main site will adversely affect a number of statutory and non-statutory nature conservation sites, such as a Scientific Interest (SSSI), Local Wildlife Sites (LWS) and District Wildlife Sites (DWS). It is also located in a Conservation Target Area (CTA) and within the Draft Nature Recovery Network (NRN) highlighting the importance of this area in nature conservation terms. Whilst these are predominantly ecological and geological considerations, they also influence the landscape character, value, and sensitivity, and should guide the approach to the landscape treatment.</p> <p>In addition to the effects associated with the main site, the proposed highway works are substantive and raise landscape and visual concerns in their own right. The development is expected to increase the number of trains, HGVs, and cars on the access roads, all of which are likely to cause increases in views, noise, and activity. The proposed landscape treatment around the extended junction 10 and the bypasses looks minimal and does not deliver any wider landscape benefits. In addition, the development might also result in an increase in vehicle movements in the wider area, which in turn has the potential to adversely affect the tranquillity of villages and the landscape beyond the immediate site context. An appropriate assessment of impacts on tranquillity for the wider area should be provided.</p>	<p>The landscape strategy and opportunities for biodiversity gain have been fundamental elements of the draft proposals. The assessment of effects on habitats, sites of ecological importance and protected species has also informed the design of the scheme and draft parameters proposed. The impacts on ecology from the proposed development are set out in further detail within the draft ES Ecology Chapter and its Appendices.</p>	
<p>Climate Impact</p>		<p>Being 'preliminary', this draft chapter includes details of the scope and methodology of the above assessments which will be undertaken and presented in the final draft ES chapter (at the 'Stage 2' consultation process). OCC expects more scrutiny will be applied to the final draft of this ES chapter, specifically on operational and construction emissions, and subsequent mitigation measures.</p> <p>Table 15.3 outlines which emission sources will be included in the final draft ES Assessment. We note direct emissions from operations (including vehicular) is included. In this assessment we would expect to see included the emissions from vehicles as a result of reduced congestion of the highways, and evidence of how this will not induce further demand from private vehicles. We also note in Table 15.3 that emissions from the construction phase are not to be included in the ES Assessment. We strongly encourage these sources (particularly embodied carbon and energy from construction) to be included in order to ensure mitigation measures are considered early and built into the Proposed Development's design and contract conditions.</p>	<p>The draft ES Climate Change Chapter has been updated including details on emissions during both the construction and operational phases of development.</p>	