



DCO Submission

Environmental Statement

Chapter 3: Transport

Appendix 3.3: Summary of Stage 1 Non-Statutory consultation comments

Document 6.3C

On behalf of

Oxfordshire Railfreight Limited

Prepared by ADC Infrastructure Ltd
March 2026

- The Report for Cabinet, dated 19 July 2022, set out OCC’s response to the (Stage 1) non-statutory consultation. It noted that the published consultation information was preliminary, and so the response “sets out the interim position statement” of OCC. Section 2 focused on Highways. Table A3.3:1 below sets out the comments made within the text, together with a response on how this comment has been addressed.

Table A3.3:1 OCC comments on (Stage 1) non-statutory consultation

Paragraph reference	Subject	Response / Action Taken
The need for development at this location		
21	OCC raise concern that the rail freight terminal use cannot be enforced, and that the site could become a large logistics park with the added benefit of freight handling. This would in turn mean the environmental benefits of the development are overstated.	The DCO is drafted in such a way as to secure the delivery of the rail terminal an early action, and to limit occupation of warehousing beyond a defined level (2.5million sq. ft).until the terminal is complete and available for use. As proposed, the site could not be delivered without a rail terminal.
22	OCC have not seen much evidence that the location is an optimal place for an SRFI.	The 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 ES establishes the suitability of the site in environmental terms. The Alternative Sites Assessment ES Appendix 2.4 identifies no more suitable (or equally suitable) sites in a wide search area.
23	OCC note uncertainty on the origin/destination of rail-based container goods, and thus the danger of underestimating road-based trips not involving the rail terminal.	The rail terminal is a trip generator in its own right, and the approach to the road-based trip generation associated with the rail terminal uses empirical evidence from DRIFT, which is that 65% of road trips associated with the rail terminal have an origin / destination external to the site.
24	OCC uncertain on whether the Chiltern Line is or is planned to be a key freight corridor.	The Chiltern main line is included within the Strategic Rail Freight network as a proposed 'Diversionary Route'.
25	OCC query if the site could be considered as close to major urban conurbations.	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.
Consideration of alternative sites		
28	OCC query what alternative sites were considered and expect that this will include Graven Hill.	See the Alternative Site Assessment (ES Appendix 2.4 , which includes a consideration of this site as an alternative SRFI location).
Possible future passenger rail station		
29	OCC request that the development does not rule out the possibility of reopening Ardley station in the future; request information on how a passenger station could be accommodated alongside the freight terminal; and request that the land required is safeguarded.	Passenger rail travel will be facilitated with direct bus links to Bicester and its railway stations, to provide for rail travel as part of a multi-modal journey to and from OxSRFI. A new passenger rail station does not form part of the OxSRFI development proposals, although the OxSRFI scheme would not prejudice the future provision of such at the former Ardley Station site, should proposals be brought forwards by others.
Significant new road building		
30	OCC acknowledge proposed infrastructure is required to address impacts in local communities but note that proposed embedded infrastructure is very significant, and provides capacity at M40 J10 above that required to mitigate the impact of development, in turn risking the potential to induce additional car journeys.	The scale of the infrastructure proposed at M40 Junction 10 has been reduced since the Stage 1 non-statutory consultation following a review of the scheme during the project pause. The transport modelling demonstrates that the proposed Highway works are required to provide satisfactory access to the SRFI.
Dominance of car travel		
31	OCC note the robust forecast 92% single occupancy car trip generation leads to significant additional highway infrastructure which is at odds with the 'Decide and Provide' approach.	Discussion on the modelling scenarios and the Decide and Provide were held with the TWG, who have approved the final modelling scenarios that include additional scenarios to consider the effect of the Travel Plan.
32	OCC consider the Travel Plan target of a 10% reduction in SOV is insufficiently ambitious.	Travel Plan targets were discussed and agreed with the TWG and an ambitious but achievable target to reduce SOV trips by 26% is agreed. This aligns with the OCC LTCP5

		target to remove 1 out of every 4 current car trips in Oxfordshire by 2030.
The need for further mitigation		
33	OCC note that mitigation may be required for environmental factors beyond highway safety or relieving congestion; and that local engagement should be carried out on any proposed schemes.	The need for mitigation to prevent or reduce significant environmental effects is considered in Chapter 3 of this ES.
34	OCC require a S106 Agreement to secure contributions to provide bus services, travel plan measures, schemes to mitigate off-site traffic impacts, and improvements to PROW.	The Applicant expects that financial contributions will be secured as appropriate via S106 Planning Obligations as part of the DCO application. There is in principle agreement with OCC with regards to the Bus Service Contribution. Other measures such as speed limit changes outwith the Order Limit, cycle signage and other measures, and the Travel Plan monitoring will be delivered and secured through the DCO.
Public rights of way and non-motorised user connectivity		
35	OCC require a walking, cycling and horse-riding assessment.	The WCHAR Assessment Report was shared with OCC and NH as part of the Stage 2 Statutory Consultation. This and the WCHAR Review Report are appended to the TA, which is Appendix 3.1 of this ES.
36	OCC require a commitment to providing routes at the early stages, along with provision for ongoing maintenance and replacement costs. OCC also note there needs to be a contribution to off-site mitigation measures focused on NMU safety, accessibility and connectivity.	Diversion and changes to PROW will be undertaken as soon as practicable as part of the construction of the Proposed Development, with temporary diversions provided where necessary. The walking, cycling and right of way strategy has been developed in consultation with OCC and includes enhancements to routes beyond the Main Site.
38	Further detail is required where bridges and underpasses connect bridleways.	Details were provided as part of this Stage 2 consultation and as part of the DCO submission (see Bridge Plans Document 2.12)
Innovation – vehicle charging; local power generation; communication		
42	OCC note implications for energy supplies and space at the site for HGVs to refuel via alternative energy sources	Noted.

43	OCC refer to the charging load for cars and HGVs, and highlight that 25% of all vehicle spaces need to be provided with electric charging.	The Applicant is proposing to deliver 25% of all vehicle spaces with electric charging.
44	OCC note additional sources of power generation may be needed.	Noted.
46	OCC suggest consideration of provision for monitoring sessions for counts of movement by all modes as well as air quality and noise.	Noted.
Changes in modes of transport		
47	OCC require consideration of connected and autonomous vehicles (CAVS) and unmanned aerial vehicles (UAVs), and note that space allocated for private car parking should be flexible enough to be repurposed in the longer term.	Noted.

2. In addition, Table 1 at pages 12 to 20 of the Report to Cabinet provided detailed comments on specific documents and plans and designs. These comments have been considered in the ongoing work that has taken place since the Stage 1 non-statutory consultation, with many of the points discussed and the relevant approach agreed with OCC via the TWG.
3. National Highways did not provide a response to the Stage 1 non-statutory consultation but have continued to engage with the Applicant via the TWG.
4. CDC provided their response to the Stage 1 non-statutory consultation dated 22 August 2022. The comments raised under the 'Development and Highway Context' and 'Travel to Work' sections of their response, and action taken with regards to each comment is shown in Table A3.3:2.

Table A3.3:2 CDC comments on (Stage 1) non-statutory consultation

Subject	Response / Action Taken
Development and Highways Context	
CDC need assurance that the development would not hinder the development of planned development including at Heyford Park and Bicester; that cumulative and synergistic impacts are considered; and that three applications at Baynard's Green are taken into account.	The transport modelling includes for all committed and planned development as agreed with the TWG, of which CDC are a member, and therefore the assessment takes into account the cumulative impact of the Proposed Development with other approved and planned growth. This includes committed development at Heyford Park and Bicester. The (now refused) applications at Baynard's Green are also considered, as discussed in ES Chapter 3, and

	following the approach agreed with the TWG at that time.
CDC require details regarding construction access and proposed phasing of development and associated highway infrastructure	The phasing of the embedded Highway Works is described at Chapter 5 of the TA (ES Appendix 3.1). Details regarding the routing of construction traffic is also provided within the Construction Traffic Management Plan (CTMP) that is appended to the TA.
CDC require the parameters plan to be updated to include all existing and proposed pedestrian and cycle routes associated with the approved Heyford Park development. CDC also require the parameters plan to be updated with details of approved and currently proposed developments at and near to Heyford Park, Chesterton and Bicester, including the eastern edge of Heyford Park west of Chilgrove Drive.	The role of the Parameters Plan is to define the proposed parameters of the scheme (and forms the basis of the EIA). The existing and future baseline walking cycling and PRow are discussed in the Sustainable Transport Strategy (STS) that is appended to the TA and at Chapter 4 of the TA. This describes how the Proposed Development will integrate with those facilities.
CDC require the assessment to take account of 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 transport modelling includes for all committed and planned development as agreed with the TWG, of which CDC are a member, and therefore the assessment takes into account the cumulative impact of the Proposed Development with other approved and planned growth.
Travel to work	
CDC require clear understanding of travel to work patterns, and the sustainability of those patterns, including with regard to carbon emissions.	The STS that is appended to the TA considers the travel to work patterns and catchment areas of the Proposed Development. An assessment for the greenhouse gas emissions associated with the Proposed Development is provided at Chapter 15 of this ES.
CDC require a comparative assessment of potential locations for the proposed SRFI with a proportionate comparison of sustainability credentials and impacts.	The Alternative Sites Assessment appended to the ES provides a comparative assessment of potentially suitable alternative sites.
CDC agree with OCC that a 10% modal shift target for single occupancy car modal share is insufficiently ambitious.	Travel Plan targets were discussed and agreed with the TWG and an ambitious but achievable target to reduce SOV trips by 26% is agreed. This aligns with the OCC LTCP5 target to remove 1 out of every 4 current car trips in Oxfordshire by 2030.
CDC note that deliverable proposals for non-car based connectivity to Bicester will be needed. The	The STS that is appended to the TA along with the Framework Travel Plan (ES Appendix 3.2) describe the hard infrastructure and softer

<p>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.</p>	<p>measures and commitments being made to ensure that the Proposed Development is provided with high quality active travel connectivity, including new and enhanced public transport links and car share opportunities, to maximise the use of sustainable modes of travel to and from the site.</p>
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5. Consultation responses were also received from numerous other parties which included comments relating to transport matters. All responses and information received have been considered and have informed the preparation of the information contained in the Transport ES Chapter.