



Applicant's Comments on Relevant Representations

Document 9.1
Revision -

On behalf of
Oxfordshire Railfreight Limited

Prepared by Oxalis Planning
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Oxfordshire Strategic Rail Freight Interchange and Highways Order 202X

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1. INTRODUCTION

- 1.1 Following acceptance of the Oxfordshire Strategic Rail Freight Interchange (OxSRFI) application by the Secretary of State on 31 March 2026, Interested Parties were invited to register and make representations (Relevant Representations). The Examining Authority (ExA) has requested that comments on Relevant Representations (RRs) are submitted at Procedural Deadline A. Where the Applicant wishes to respond to the issues raised, this report sets out that response.
- 1.2 The report is split into several parts. The first part, **Part 1A** below, deals with issues arising out of the RRs submitted by statutory bodies, organisations and local Councils. These are addressed in a tabular form by direct reference to each respondent's representation number, as assigned by the Planning Inspectorate.
- 1.3 Due to the length of representations provided by Cherwell District Council (RR-024), the Environment Agency (RR-042) and Oxfordshire County Council (RR-109), the summaries of, and responses to these RRs are provided under separate cover within **Appendix B** to this document. It should also be noted that the Applicant's responses to issues raised specifically relating to the draft DCO can be found in **Appendix A** to this document.
- 1.4 The second table (**Part 1B**) focuses on RRs from individuals or groups of individuals focused on those which have raised very specific or uncommon questions or issues.
- 1.5 The third table (**Part 1C**) contains the Applicant's responses to RRs made by those parties with an interest in the land within the Order limits.
- 1.6 The final part of the Applicant's response (**Part 2**) is in the form of a narrative report covering common issues and concerns raised by individual respondents. Most of the representations received have been organised into common themes. In order to avoid repetition, this report does not deal with each individual representation in isolation but rather addresses the concerns raised in a single response to each identified issue. Where statutory bodies, organisations and local authorities raise general issues which mirror the concerns set out by individuals in their relevant representations, these are addressed in Part 2 of this report with a cross reference made to the relevant paragraph in Part 1.

PART 1A – REPRESENTATIONS OF STATUTORY BODIES, ORGANISATIONS AND LOCAL AUTHORITIES

RR Reference	Name/Organisation	Summary of Representation	Applicant Response
RR-017	Bucknell Parish Council	Bucknell Parish Council's main concerns relate to traffic and transport. They welcome the proposals for the proposed 7.5T weight restriction and speed restriction on the approaches to the village, but suggest that further measures are required. In particular they request that the project delivers a relief road around Bucknell to ease congestion through the village. The RR also raises concerns that the Middleton Stoney Relief Road will encourage rat running along Middleton Road (which leads to Bucknell) particularly when the B4030 is busy. Finally, the RR raises concerns about the cumulative impact of development in the area, including Tritax/Albion at Baynard's Green, Puy du Fou, Hawkwell Village, Heyford Park and additional housing at Caversfield, and urges OxSRFI, as a government-led national infrastructure project, to show leadership on this issue.	The provision of the Ardley Bypass and Middleton Stoney Relief Road provides an effective and improved route for traffic travelling between Bicester and M40 J10. The highway works address existing congestion, particularly at the Middleton Stoney crossroads, and this leads to forecast traffic reductions on Middleton Road and Ardley Road, as drivers choose to use the improved route instead of travelling via Bucknell. In addition, numerous measures are proposed to mitigate the impact of traffic and transport on Bucknell, including: • Automatic Number Plate Recognition (ANPR) cameras as part of the HGV Routeing Strategy (which is Appendix 6 of the TA (Document 6.3A.02, pages 518 to 531/AS-056) to ensure that OxSRFI HGV traffic does not use the local road network, including through Bucknell. • A 7.5T environmental weight restriction zone is proposed around the villages to the north and west of the Main Site, including Bucknell, see figure 5 of the HGV Routeing Strategy (Document 6.3A.02/AS-056, pages 518 to 531). This is a complementary measure to the wider highway network changes in that it will clearly set out to the wider travelling public that the local routes through Bucknell are not appropriate for use by HGVs. • A speed limit reduction along Bucknell Road/Bicester Road combined with a cycle scheme to discourage vehicles travelling from Bicester to access M40 Junction 10 through Bucknell; • A speed limit reduction and traffic calming feature along Ardley Road to increase travel times for vehicles who travel

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			from Bicester to M40 Junction 10 to discourage them from using this route; and • Signalisation of the Middleton Road bridge over the M40, that will increase travel times and discourage through traffic from using this route and allow for an off-carriageway route for walkers, cyclists, and horse riders connecting the currently separate lengths of bridleway either side of the M40. Detailed highways modelling has been progressed with Oxfordshire County Council who agree that with these measures in place, the impact of transport on Bucknell is acceptable. The Applicant has undertaken a robust cumulative impact assessment as part of each ES topic which considers the cumulative impacts of an extensive list of planned, committed and proposed development in the vicinity of the Main Site, in addition to the OxSRFI scheme (please refer to ES Chapter 16 (Cumulative Effects) (Document 6.16/APP-184). The list of sites was informed by discussions with the local planning authority, as explained in ES Chapter 1 (Introduction) (Document 6.1/APP-169).
RR-019	CPRE Oxfordshire	The RR confirms CPRE is supportive of the principle of moving freight from road to rail, but suggests OxSRFI will not achieve that aim to a significant extent. The loss of countryside and environmental harm outweigh any mode shift benefits. The five main areas of concern identified are:	The Applicant's response to these 5 main areas of concern is: 1. NSIP designation – The OxSRFI scheme is a NSIP as a matter of law because it meets the thresholds set by the Planning Act 2008. The Application would not have been accepted by the Planning Inspectorate if it did not meet the requirements and definition of a NSIP. As set out in paragraph 3 of the Explanatory

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		1. Inappropriately designated as an NSIP - CPRE considers this a new regional lorry and warehousing operation with inadequate proof it will increase use of rail freight. The fact it is on the national freight network does not make it 'strategic'. The approach should mirror the rigour applied to planning applications, and should consider cumulative issues with other distribution proposals near Junction 10 (currently at appeal). 2. Location, need and cost concerns CPRE consider there is a lack of evidence regarding need, and note the proximity to existing SRFIs at Daventry and Northampton Gateway. CPRE cite other concerns including OxSRFI not being allocated in the local plan, and no identification by Chiltern Railways of a future requirement for an Ardley Station. The RR suggests a lack of evidence of genuine road-to-rail freight transfer benefits not merely abstracted from other SRFIs. CPRE suggests an SRFI should be provided on the M4 corridor to meet needs. CPRE acknowledges the increased supply of large (over 1m sq.ft) warehouses suggesting no further need for this scheme.	Memorandum (Document 3.2, APP-140), the Application comprises three NSIPs together with associated development. The proposals clearly meet the definition of an SRFI which explicitly requires both road and rail access to the strategic networks, and the provision of a rail freight terminal and warehousing. 2. Location, need and costs - The Application responds directly to the '<i>compelling need</i>' for additional SRFIs identified by national policy (the NPS) which explicitly seeks to enable an expanded network of SRFIs across the regions. The Applicant's strategic case in support of the Proposed Development and the location is set out in the Planning Statement (Document 5.4/APP-161), and the Market Analysis Report (Document 7.1/APP-311), supported by the GB Railfreight Supporting Statement (Document 7.2B/ APP-313). In addition to the need established by the NPS, there is a recognised need for strategic logistics in this part of the M40. The Applicant has concluded that the OxSRFI will help to expand the network of SRFIs, meeting the needs of a market area currently poorly served. Evidence from all other SRFIs, consistent with national policy, shows that there is market demand for rail freight and mode shift does occur once new terminal capacity is created (see both the Market Report, incl. Section 6) and GB Railfreight statement referred to above). Without new SRFIs the ability to achieve further mode shift from road to rail will be constrained. The increase in supply of very large warehouses underlines the market need and demand for such buildings – it is a market signal that sites capable of accommodating such buildings are needed, not a signal that no more are required.

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		The RR questions profitability of the proposals and suggests the Applicant has likely underestimated the costs including the M40 junction upgrades and tunnel gauge clearance works. CPRE also suggests that the proposed Junction 10 works are inadequately designed, and that works there would be 'charged back' by National Highways to OxSRFI and would make it unprofitable. 3. Insufficient cumulative impact analysis The RR refers to several other large-scale development proposals in the vicinity (including Heyford Park new town, Puy du Fou leisure park, and the 'Baynard's Green' warehousing proposals). CPRE is concerned about the cumulative effects, including loss of countryside, on water supply, and loss of farmland. 4. Highways mitigation is insufficient - CPRE considers the proposed design of the M40 J10 works inadequate, and also refers to potential cumulative effects with other proposals, with concerns that the B4100 cannot handle increased traffic. Concerns regarding distance to Bicester and reliance on car	The Applicant is fully aware of aspirations and ambitions for a new passenger Railway Station – see the Passenger Rail Station Note (Document 5.4C/AS-050) appended to the Planning Statement. The Applicant is in constructive dialogue with OCC regarding their work to promote a new Station. OxSRFI would not prejudice the delivery of a future passenger Station and indeed could help (as noted in paragraph 6.2 of the Statement of Common Ground with Network Rail (Document 8.1, AS-092)). CPRE's concerns regarding infrastructure costs are noted, but unfounded. The Applicant would not seek consent for a scheme which could not be delivered commercially. The highways works have been informed by direct involvement from National Highways (NH) and OCC Highways (and CDC), and are considered appropriate and deliverable. CPRE are misinformed regarding the delivery or funding arrangements regarding works at M40 Junction 10 which will be funded by OxSRFI and will not be subject to any 'charge back' to the public sector. 3. Cumulative impacts - The Transport Assessment (TA) (ES Appendix 3.1 Transport Assessment – part 1 of 11 (Document 6.3A.01/AS-055)) is explicitly based on a comprehensive assessment of 'cumulative' transport and traffic issues, considering all committed and consented development (local plan sites and planning permissions)– the approach is a direct response to constructive working via the Transport Working Group (TWG) of NH and OCC Highways. Furthermore, the approach takes due account (as agreed with the TWG) of emerging live

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		traffic, and environmental harm to local communities from noise, pollution and congestion from such traffic. 5. Loss of countryside and environmental harm Concerns regarding the loss of farmland, and that CPRE cannot find detail regarding mitigation for loss of farmland in the application. No evaluation of economic benefits of the site continuing in agricultural use. CPRE suggest shortcomings in the Environmental Assessment including lack of SSSI mitigation strategy, veteran tree/ancient woodland assessment inaccuracies, no indirect ancient woodland impact assessment, bat mitigation (hop-over) concerns, BNG assessment inaccuracies and no quantification of impact of loss of irreplaceable habitats, and inadequate heritage screening to off-site listed dwellings nearby. CPRE's view is that the sum of harms may outweigh any gains from the OxSRFI proposals.	planning applications (which are not committed or approved). The Applicant has also engaged where required to share highways data with Puy du Fou and Dorchester Living (developer of Heyford Park) to enable them to also engage in appropriate cumulative assessments. The wider ES for OxSRFI also considers potential cumulative effects – see all ES Chapters, but specifically also Chapter 16. 4. Highways mitigation - CPRE's view that the Junction 10 proposals are inadequate is contrary to that of the key highways consultees (NH and OCC) who have engaged with the detail of the proposals via the TWG since 2020/21. The position of these key consultees is also being captured through emerging SoCGs. The proposals include comprehensive Active Travel and sustainable travel elements, including significant investment in bus services serving a range of nearby communities, and ensuring the OxSRFI site is connected by means other than the private car. Chapter 9 of the TA (ES Appendix 3.1 Transport Assessment – part 1 of 11 (Document 6.3A.01/AS-055)) presents the assessment of the strategic transport modelling using the Bicester Transport Model (BTM). As shown in the traffic flow change plots at Figures 9.7 and 9.8 of that chapter, a reduction in traffic is forecast on the B4100 between Bicester and the Baynard's Green roundabout as a result of the proposed highway works. 5. Environmental harms -

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			The environmental issues and topics raised have been considered in the submitted ES, including mitigation for loss of farmland through protection and re-use of on-site soils to retain that resource and support landscaping and planting on-site (secured as part of the earthworks details in accordance with draft DCO Requirement 13(1)(a)). The ES adopts a proportionate approach to assessment, focusing on those economic effects with the potential to be significant (In EIA terms), including construction employment, operational employment, GVA generation, expenditure effects and wider economic benefits associated with the proposed Strategic Rail Freight Interchange, which are of a substantially greater magnitude than the economic activity currently supported by the existing agricultural uses of the Site. Ashgrove Farm is a relatively small agricultural holding, centred on a traditional farmstead, with a number of buildings having been identified as redundant or suitable for alternative uses and some that have been converted to domestic purposes in recent years. The farm supports agricultural activities associated with arable farming and grazing, which generate a relatively low level of direct on-site employment and economic output compared with the scale of economic activity associated with the proposed development. Other agricultural landholdings would only see a relatively small proportion of land lost if OxSRFI is developed, and is not considered likely to alter in a significant way. As a result, the economic benefits associated with the retention of the Site in agricultural use were considered negligible within the context of the wider study area economy and therefore were scoped out of detailed assessment. In this context, any reduction in agricultural economic activity

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			attributable to the development would be limited and would not materially alter the conclusions of the socio-economic assessment. The mitigation for impacts on the SSSI is multi-faceted with geological and ecological elements, addressed through ES Chapters 6 (Document 6.6/APP-174) and 11 (Document 6.11/APP-179), the BNG Assessment (Documents 6.6I.01 and 6.6I.02/AS-072 and AS-073) and HMMP (Document 6.6K/AS-075). Following dialogue with CDC the Applicant is making updates to the submitted Arboricultural Assessment (Document 6.6H/APP-241), the BNG Assessment, the CEMP (Document 6.2C/APP-189) and Draft HMMP (Document 6.6K/AS-075) to correct identified errors including regarding veteran trees, noting the different definitions of 'veteran' under the NPPF as compared to the BNG regulations. A veteran tree mitigation strategy will be produced and provided as set out in the Cover Letter for Procedural Deadline A. This will outline a bespoke strategy to compensate the loss of irreplaceable habitats and conserve ecological function that covers habitat creation, long-term management and monitoring. The BNG Assessment and HMMP together will secure the proposed measures and long-term management of retained and created habitats. These will also each be amended in light of changes to be made to the farmland bird compensation mitigation and provided as set out in the Cover Letter for Procedural Deadline A. A separate document summarising the bespoke SSSI mitigation strategy will also be provided.

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			Recent correspondence received from Natural England will be appended to the updated Bat Survey Report (current ref. Document 6.6C/AS-069) that confirms the appropriateness of avoiding the use of hop-over trees in circumstances such as the relief road crossing of the Gagle Brook. The provision of hop-over trees at other road crossing points will be reconsidered on a location-by-location basis and the Bat Survey Report updated as appropriate (please refer to the Cover Letter for Procedural Deadline A for further detail). The reference to off-site listed buildings is unclear and the CPRE RR does not give any details about the heritage assets of concern. The Applicant has submitted a comprehensive assessment of likely impacts on heritage assets on and off-site, and has worked closely with CDC Heritage and Historic England, from whom no such similar concerns have been raised.
RR-024	Cherwell District Council (CDC)	Due to the nature and length of the RR, and also the extent of response provided by the Applicant, RR-024 has been summarised within Appendix B .	Due to the nature and length of the RR, and also the extent of response provided by the Applicant, please see Appendix B .
RR-025	Chiltern Railways (CR)	Chiltern Railways (CR) is grateful for the constructive sessions held with the Applicant to address concerns raised earlier in the process. CR recognises many of their concerns will not be mitigated until the formal Network Rail Network Change process. In summary CR's position is set out as:	The Applicant welcomes CR's acknowledgement of the constructive sessions held to address early concerns, and the clear policy context which explicitly encourages additional use of rail freight on the UK network. The Applicant continues to liaise with CR and has had constructive discussions in relation to CR's RR. As stated by CR, further detailed modelling and timetable work will be required post-consent, i.e. through the Network Change

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		- Further technical information is required for CR to fully support the scheme – CR recognises some answers will not be available until later in the process, i.e. Network Change (also notes that Signalling and rail capacity works are required to accommodate this scheme). - Connection on to the Chiltern Main Line will provide seamless connectivity to the national rail network for freight services, and is aligned with several rail and freight growth policies. - Proposals should include reference to the Heyford Park housing estate and possible new station at Ardley. Further rail modelling will take place at a later stage in the process. - CR recognise that at least four return freight paths have been identified, and further timetable and performance modelling needed at a later stage in the process ('Network Change'). - CR is aware of significant growth planned through numerous major schemes, including Heyford Park and Puy du Fou, as well as a new potential Ardley Station – CR is keen to understand the growth trajectory to support business cases to enable future rolling stock.	process working with Network Rail. This is common practice for SRFI. The Statement of Common Ground with Network Rail includes, as an Appendix, an explanation as to how the freight pathing process works. This explains how freight paths are allocated alongside passenger service paths and how Network Rail works to accommodate both passenger and freight growth. The Applicant acknowledges CR's comments in relation to a possible new station at Ardley and the further work (by others) required to investigate the prospect of a new station. The Applicant has assessed the potential relationship between the OxSRFI scheme and a potential new station, and this is set out within the Planning Statement Appendix 3 (Passenger Rail Station Note (Document 5.4C/AS-050)). It is relevant to note that the Chiltern Railways franchise will transfer to the Government's state owned holding company DfT Operator Limited on the 20th September 2026.

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		There is currently limited information on the method for construction and integration into the Chiltern Main Line. It is vital that Chiltern Railways is aware of proposed construction and commissioning strategies for all aspects of this scheme relating to the existing Chiltern Main Line railway. CR recognise the engineering access strategy will not have been drawn up at this stage and therefore further information will be available at the Network Change stage.	
RR-034	Deddington Parish Council	Deddington Parish Council objects to the proposals on the following grounds: 1) Traffic The RR sets out that the area affected by traffic impacts will extend beyond the area where highways mitigation is proposed and that reliance on the Junction 9 and 10 improvements will not adequately address these impacts. It goes on to say there will be traffic impacts both during construction and operation and that in particular Deddington suffers severely from traffic when the M40 is closed. The RR requests that should consent be granted several mitigation measures to be delivered in advance of construction:	1) Traffic The strategic traffic modelling covers Deddington and the A4260/B4031 junction. The traffic impact of the Proposed Development on the junction was considered as part of the Stage 2 Transport Modelling work (Appendix 27 of the TA) (Document 6.3A.09/AS-063, pages 3 to 102). That assessment work confirmed that there would not be material changes in the operation of the junction with the Proposed Development in place. This was agreed with OCC as part of the agreement of the study area for detailed assessment. The traffic flow changes at the junction fall below the thresholds at which changes in environmental transport effects would be discernible. Hence there is no requirement for its inclusion in the study area considered in the transport chapter of the ES. Information on the planned and unplanned closures of the M40 between J9 and J10 (and vice versa) that resulted in traffic being diverted onto the B430 (the designated diversion route) was provided by National Highways and considered by the

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		- Improvements to the A4260/B4031 junction in Deddington. - Resurfacing of New Street and High Street with low-noise surfacing. - Installation of ANPR enforcement cameras on the B4031 Clifton Road to prevent HGVs breaching the existing 7.5-tonne weight restriction. - Traffic-calming measures along Clifton Road and in Clifton village. 2) Cumulative impacts Alongside other developments proposed nearby (i.e. Heyford Park new town, Puy du Fou theme park and Albion/Tritax logistics at Junction 10) the proposals represent overdevelopment that together would change the whole character of the area. 3) Need for a rail terminal, gauging and capacity The RR questions the need for the terminal given the presence of existing rail freight facilities to the north and south. The RR raises concerns that the proposed W8 rail gauge could limit the terminal's long-term usefulness in a freight market increasingly geared towards W10 and W12 container standards.	Transport Working Group (TWG). That data showed an average of 1 unplanned closure of the M40 per year over the most recent 3.5-year period, and an average of 3 (rising to 6 if slip lane closures are included) planned closures of the M40 per year. The planned closures were generally scheduled overnight. Therefore, it is not a frequent event and the TWG confirmed that there is no requirement to examine such a scenario in the ES, as the ES needs to consider the most likely scenario. As detailed in the HGV Routeing Strategy (Document 6.3A.02/AS-056, pages 518 to 531) the Proposed Development will provide ANPR enforcement on the B4100 to the north of the Baynard's Green roundabout and on Station Road just to the north of Ardley. Provision of this ANPR enforcement already ensures that OxSRFI HGV traffic will not travel via the local route network, including the B4031 Clifton Road. Hence there is no requirement for additional ANPR cameras directly on the B4031 Clifton Road. The routeing of construction traffic will be controlled as set out in the Construction Traffic Management Plan (CTMP), Appendix 38 of the TA (Document 6.3A.10/AS-064, pages 84 to 99). As detailed, HGV construction traffic will not be permitted to route via the B4031 (or other local routes). 2) Cumulative Impacts OxSRFI has undertaken a robust cumulative impact assessment as part of the ES – this considers the potential for impacts in combination with an extensive list of planned, committed and proposed development in the vicinity of the Main Site, in addition to the OxSRFI scheme (please refer to ES

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		Concerns are also expressed about rail capacity, noting that Birmingham is already a bottleneck on the network and that additional freight services could worsen congestion and delays.	Chapter 16 (Cumulative Effects) (Document 6.16/APP-184). The list of sites was informed by discussions with the local planning authority, as explained in ES Chapter 1 (Introduction) (Document 6.1/APP-169). 3) Need for a rail terminal, gauging and capacity The Application responds directly to the ‘compelling need’ for additional SRFIs identified by national policy (the NPS) which explicitly seeks to enable an expanded network of SRFIs across the regions. The Applicant’s strategic case in support of the Proposed Development and the location is set out in the Planning Statement (Document 5.4/APP-161), and the Market Analysis Report (Document 7.1/APP-311), supported by the GB Railfreight Supporting Statement (Document 7.2B/APP-313). The Applicant has concluded that the OxSRFI will help to expand the network of SRFIs, meeting the needs of a market area currently poorly served. The Chiltern Main Line has regularly been used by freight traffic for some time, and does form part of the national Rail Freight Network. The Applicant has submitted various reports regarding the rail infrastructure context for the OxSRFI proposals and these directly address issues of capacity and gauging – see the Rail Report (Document 7.2/APP-312), and the reports submitted by GB Railfreight who intends to operate the terminal, including their Rail Freight Capacity Report (Document 7.2C/APP-314). The recent email received by the Applicant from Network Rail (at Appendix D) is also referring directly to a number of issues raised in various RRs from interested parties.
RR-041	England’s Economic Heartland (EEH)	EEH request the Examination to consider:	The study area for assessment in the Transport Assessment (TA) (Document 6.3A.01/ AS-055), including at remote off-site

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		• Highways impacts and potential mitigation at remote off-site locations • Potential cumulative transport impacts with emerging (not committed) development proposals in the area. • Potential for a future new rail passenger station. • Location of the site on the rail network in terms of serving key freight paths • Potential impact on passenger rail services EEH are disappointed ES Chapter 3 (Transport) and the relevant appendices do not discuss rail impacts. The amount of warehousing permitted ahead of the main line rail connection being fully operational should be limited (EEH acknowledges DCO Requirement 5. There does not, however, appear to be provision for alternative fuelling for road freight vehicles e.g. consideration of electric charging or hydrogen refuelling. OxSRFI proximity to the Radlett, Northampton Gateway and DIRFT SRFI result in potentially overlapping catchments.	locations, was agreed with OCC and National Highways and has been appropriately and thoroughly assessed. The TA is explicitly based on a comprehensive assessment of ‘<u>cumulative</u>’ transport and traffic issues, considering all committed and consented development (local plan sites and planning permissions)– the approach is a direct response to constructive working via the Transport Working Group (TWG) of NH and OCC Highways. Furthermore, the approach takes due account of emerging live planning applications (which are not committed or approved) as agreed with the TWG. The Applicant has also engaged where required to share highways data with Puy du Fou and Dorchester Living (the developer of Heyford Park) to enable them to also engage in appropriate cumulative assessments. The wider ES for OxSRFI also considers potential cumulative effects – see all ES Chapters, but specifically also Chapter 16 (Document 6.16/APP-184). The Applicant is confident that the OxSRFI meets the relevant test set out in the NPS in relation to <u>rail</u> pathing and will provide the opportunity for a successful rail freight terminal which can deliver meaningful mode shift. Details of the approach to rail and the rail freight market are set out in the submitted Rail Report (Document 7.2A/APP-312), the Supporting Statement by GB Railfreight (Document 7.2B/APP-313), and the GBRailfreight Capacity Report (Document 7.2C/APP-314). The recent email received by the Applicant from Network Rail (at Appendix D) is also referring directly to a number of issues raised.

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		EEH queries whether the Chiltern Main line in this area serves obvious freight paths – for example, Network Rail’s Core Freight Network does not appear to route directly past the proposed main line connections. Also queries the routes used in the Pathing Study (figure 8, Appendix 7.2A). EEH queries whether the Chiltern Main Line is part of the Strategic Rail Freight Network. EEH reference further consideration of the Mode Shift from Road to Rail based on information in ES Chapter 3 (Transport) and question whether the forecast container numbers used in the trip road freight to rail freight mode shift calculations remain appropriate.	The Applicant is fully aware of the local ambitions and aspirations to see a new passenger rail Station close to Ardley. The Applicant is engaged in constructive dialogue with OCC and CDC regarding their exploration of the feasibility of a new Station, including ongoing work on a SoCG on rail issues. The Planning Statement Appendix 3 contains a Passenger Rail Station Note (Document 5.4C/AS-050) which helps set out the Applicant’s position with regard to the emerging potential new Station. That Note explains how OxSRFI would not prejudice the delivery of a passenger Station and includes details of the ways in which OxSRFI would potentially help enable delivery or reduce future infrastructure works and costs for those bodies who would bring it forward in due course. Consistent with the recommended approach referred to by EEH, the proposed draft DCO does include a limit on warehousing permissible in advance of the terminal being operational. Restricted to no more than 232,258 square metres of warehouse floorspace (including ancillary office). The assumptions made in ES Chapter 3 (Transport) (Document 6.3/APP-171) relating to mode shift and container numbers are considered to remain appropriate and up to date. The approach to the assessment is based on the average payload per intermodal train. It is not based on maximum train lengths but does take account of the forecast increase in payload per train which includes the potential for trains to get longer (from around 500m to 640m or up to 750m (775m with locomotive)), in the future.

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RR-042	Environment Agency (EA)	The RR is comprehensive at 66 pages, and is structured using four broad sections (appendices): A. Key Issues B. Ardley Landfill and Environmental Permitting Requirements C. Additional Comments and Advice D. Summary Table of EA Position. The issues are summarised in Appendix B.	The Applicant notes and welcomes the constructive content of the RR which follows extensive dialogue about the proposals, and relevant associated technical and regulatory issues. Specific responses to the various detailed queries and points are provided as part of Appendix B.
RR-043	Evenley Parish Council	Whilst being supportive of economic growth in principle, Evenley Parish Council raise concerns about the cumulative traffic impacts of existing and proposed developments along the A43 corridor between the M40 and M1. The RR highlights a range of schemes contributing to increased pressure on the route, including the expansion of Silverstone, the proposed Puy du Fou theme park, major logistics developments at Barley Mow, OxSRFI and Towcester, and the recently approved anaerobic digester in Evenley. The RR requests that a strategic package of measures, including safer cycling infrastructure between Evenley and Brackley, upgrades to the Barley Mow and Evenley roundabouts, improvements to capacity and traffic flow at M40 Junction 10,	The Applicant acknowledges and welcomes the support of economic growth in principle. The Transport Assessment (TA) (Document 6.3A.01/AS-055) submitted with the Application includes a comprehensive assessment of 'cumulative' transport and traffic issues, considering all committed and consented development (local plan sites and planning permissions), plus – in direct response to constructive working via the Transport Working Group (TWG) of NH and OCC Highways - takes due account of emerging live planning applications (which are not committed or approved). The Applicant has also engaged where required to share highways data with Puy du Fou and Dorchester Living (the developer of Heyford Park) to enable them to also engage in appropriate cumulative assessments. The highways mitigation proposed as part of the scheme includes considerable improvements to M40 J10 to improve capacity and traffic flow. In addition, a monitor and manage strategy has been agreed with National Highways to deliver an

RR Reference	Name/Organisation	Summary of Representation	Applicant Response
		and additional landscaping and tree planting to mitigate noise and air pollution impacts on nearby communities.	improvement to the Barley Mow roundabout in the event traffic reaches defined triggers. Provisions will be included in the draft DCO once those are agreed with NH. A careful and considered approach has been taken in terms of planting and landscaping along the highways infrastructure proposed to mitigate potential impacts as set out in the Design Approach Document – Highways Design Approach (Document 5.5C/ APP-168).
RR-045	Gallos Brook Campaign (GBC)	The GBC raise concern about the levels of PFAS in the streams, rivers surrounding the former Heyford Airbase with test results for 10 of the rivers to the south side of the base, all showing significantly high levels of PFAS contamination. On the assumption that watercourses are polluted, GBC raises concerns that contamination in clay or soils, and groundwater, could expose construction workers to high levels of PFAS. GBC believes that within the OxSRFI Application Site, Padbury Brook (near Crowfoot pond) is contaminated with PFAS and request further testing and a remediation plan to demonstrate how it will be dealt with.	The Applicant is aware of the PFAS agenda locally and of the context relevant to the former Heyford Air base, and is aware that some other sites or locations nearby have identified relatively high-levels of PFAS, including in the Gallos Brook. PFAS contamination is becoming increasingly common and widespread as understanding and knowledge, and the ability to test for it, improves. In response the Applicant has undertaken testing on the OxSRFI Main Site. The Applicant's work to date has identified low levels of PFAS in parts of the SRFI site, considerably lower than some of the levels known to have been found at other sites nearby which have a more direct 'pathway' from the former RAF base. The results show OxSRFI site's watercourses (tributaries of the Gagle Brook – not the Gallos Brook) have been receiving PFAS from off-site. The Applicant's groundwater testing also shows low levels of PFAS on-site with no evidence of any major accumulations. The submitted Construction Environmental Management Plan (CEMP) (Document 6.2C/APP-189), and associated draft DCO Requirements already make provision for dealing with contamination on-site, and the processes and approach identified would apply equally to PFAS contamination.

RR Reference	Name/Organisation	Summary of Representation	Applicant Response
			However, the Applicant can provide the additional information to the Examination process regarding the results of the assessment and how it proposes to remediate or manage PFAS on-site (as part of an updated ES Chapter 11).
RR-050	Gloucestershire County Council (GCC)	GCC would welcome further information on transport modelling outputs to understand the potential trip distribution to/from the site, to make an informed judgement on any potential impacts on Gloucestershire's highway network. A "Construction Traffic Management Plan" and "Travel Plan" would be welcome showing appropriate HGV routes to access the site. GCC want to ensure that we fully understand the wider HGV routing impacts for the A40, A429, A44 primary route network during the construction phase and the movement of quarry materials to the intermodal freight terminal in the longer term. As outlined in the Gloucestershire Local Transport Plan 2020-2041, a large area of the Cotswolds National Landscape is subject to a "Lorry Management Zone". Gloucestershire has in place an "Advisory Freight Route Map". HGVs serving the site should only use the primary road network. Opportunities for sustainable traction (electric, battery, bi-mode) should be	The light vehicle trip distribution for the Proposed Development is presented at Appendix 10 of the TA (Document 6.3A.03 /AS-057, pages 3 to 43). The HGV trip distribution for the Proposed Development is presented at Appendix 11 of the TA (Document 6.3A.03 /AS-057, pages 44 to 70). The Gloucestershire Lorry Management Zone was identified by National Highways as part of the process and selection and agreement of the method used to calculate the development HGV distribution, which recognises that HGV traffic would not be expected to have origins or destinations within that area. Transport modelling outputs showing the assignment of the Proposed Development traffic in the 2034 Completion Year are provided at Appendix D of the Bicester Transport Model Forecasting Report document, which is TA Appendix 14 (Document 6.3A.04/AS-058). Outputs are provided showing traffic flows in passenger car units (PCUs) and total vehicles. Separate outputs showing the assignment of the light vehicle development traffic, and the HGV development traffic are also provided. This confirms that very little light development traffic is forecast to travel to and from the west of the Main Site and hence beyond to Gloucestershire's highway network, and that the development HGV traffic would use the A34 to travel west (and southwest), from where access is available to the primary road network – the A40 and A44 (and A429 beyond). A Construction Traffic Management Plan (CTMP) is provided at Appendix 38 of the TA (Document 6.3A.10/AS-064, pages 84

RR Reference	Name/Organisation	Summary of Representation	Applicant Response
		explored to maximise the environmental credentials of the site, as well improving links to/from the Electric Freight Spine route.	to 99). A Framework Travel Plan (Document 6.3B/APP-203) is provided as part of the submission. However, the Applicant does not consider the Travel Plan the appropriate document to include HGV routes. GCC are referred to the aforementioned CTMP and the HGV Routeing Strategy, which is Appendix 3 of the TA (Document 6.3A.02/AS-056, page 518 to 531) with regards to HGV traffic routeing. As explained in the Rail Report (Document 7.2A/APP-312), passive provision is made within the track layout for future electrification, the southern and northern chords, reception sidings and southern headshunt all provide with suitable clearances to permit overhead 25 kV AC catenary to be installed in future if required. In the interim, the layout is fully accessible by diesel, bi-mode (diesel and electric via catenary) and tri-mode (diesel, battery and electric via catenary) locomotives.
RR-053	Health & Safety Executive (HSE)	The Explosives Inspectorate has no comment to make as there are no HSE licenced explosives sites in the vicinity of the proposed development. Former sites 2026 and 778 on the former Upper Heyford RAF site are no longer explosives sites.	The Applicant notes this confirmation that the former explosive storage sites on the adjacent former RAF Upper Heyford are no longer in that use.
RR-056	Heyford Park Community Action Group	Heyford Park Community Action Group (HPCAG), representing residents of Heyford Park, objects to the proposed OxSRFI development, arguing that it would have significant adverse effects on the local community, environment and infrastructure.	Scale The Application responds directly to the 'compelling need' for additional SRFIs identified by national policy (the NPS) which explicitly seeks to enable an expanded network of SRFIs across the regions. The Applicant's strategic case in support of the Proposed Development and the location is set out in the Planning Statement (Document 5.4/ APP-161), and the Market Analysis Report (Document 7.1, APP-311).

RR Reference	Name/Organisation	Summary of Representation	Applicant Response
		The group's principal concern is the scale of the development, which would comprise approximately 6.5 million sq.ft of warehousing and a rail terminal adjacent to a village of around 2,500 residents. HPCAG believes the scheme would overwhelm the existing settlement and erode access to surrounding green space. The group also raises concerns about the impact on the historic environment, arguing that warehouse buildings would detract from views of the former RAF Upper Heyford runway conservation area, Scheduled Monuments and listed buildings, contrary to local planning policies seeking to protect the area's heritage and landscape character. HPCAG highlights the length and scale of construction works, which it says would result in years of disruption through noise, dust, pollution and extensive highway works, including changes to M40 Junctions 9 and 10 and key local routes used by residents. The group is concerned that the development would generate substantial traffic impacts, with thousands of employees and significant HGV	supported by the GB Railfreight Supporting Statement (Document 7.2B /APP-313). In addition to the need established by the NPS, there is a recognised need for strategic logistics in this part of the M40. The Applicant has concluded that the OxSRFI will help to expand the network of SRFIs, meeting the needs of a market area currently poorly served. With regard to scale, the DAD (Document 5.5A/APP-166) summarises the extensive iterative design process including details of the scheme evolution and range of environmental and other design principles which have informed the scheme. This includes reference to both landscape and infrastructure considerations which led to the site, and scale of development, being defined as it is. The OxSRFI proposals (at 603,870 sq.m/approx. 6.5m sq.ft plus mezzanine) are comparable with all other approved SRFIs, albeit smaller than some including DIRFT 3 and West Midlands Interchange (which are both around 8m sq.ft). The NPS refers to the strategic nature of SRFIs as "<i>large-scale commercial operations</i>" and defines uses and criteria which have to be met including an ability to handle the longest (775m) trains which can operate on the UK network, a freight terminal and HGV facilities, and warehousing. In meeting the NPS's ambition to shift the long-haul freight legs from road to rail it is necessary and logical to seek to provide for National Distribution Centres – which tend to be the largest of all distribution warehouse facilities – on SRFI sites, and the scale of the OxSRFI proposals will allow for a number of such facilities on this site. Historic Environment An assessment of potential built heritage impacts and proposed measures to mitigate these impacts is set out in ES Chapter 10

RR Reference	Name/Organisation	Summary of Representation	Applicant Response
		movements putting additional pressure on local roads and motorway junctions, despite the proposed mitigation measures. A further concern relates to the proposed Ardley passenger rail station, which forms part of Oxfordshire County Council's long-term rail strategy. HPCAG fears the SRFI could constrain the station's future delivery and undermine sustainable transport objectives for Heyford Park and the wider area. The group also raises concerns regarding PFAS contamination, citing reported elevated levels of "forever chemicals" in Gallos Brook and questioning whether development of the site could expose residents, workers and future occupants to potential health risks. HPCAG emphasises the cumulative impact of the SRFI when considered alongside other major planned developments, including a proposed 9,000-home expansion at Heyford Park, the Puy du Fou theme park and employment development at M40 Junction 10. It argues that the combined effects on traffic, air quality, infrastructure and landscape have not been adequately assessed.	(Heritage – Built and Archaeology) (Document 6.10/APP-178). Specific measures to mitigate impacts on the RAF Upper Heyford Conservation Area (including Scheduled Monuments and Listed Buildings includes reduced building heights within northern part of the Site (Zone B) and a half-height bund orientated on the eastern end of runway. The ES Chapter concludes that the effect of the development on the RAF Upper Heyford Conversation Area is Minor Adverse both during construction and operation. Historic England confirmed in their Relevant Representation (RR-058) that they concur with this assessment. Disruption during construction The implementation of a range of relevant measures and controls embedded within the Construction Environmental Management Plan (CEMP) (Document 6.2C/APP-189) and the Construction Traffic Management Plan (CTMP) (Document 6.3A.10/AS-064, pages 84 to 99) will minimise disruption during the construction phase of the development and minimise adverse environmental effects. Each topic within the ES assesses construction impacts from the OxSRFI scheme with mitigation measures proposed where needed to minimise residual effects, these measures are often included in the CEMP and CTMP. A summary of construction effects for each topic is included in ES Chapter 17 (Summary of Effects) (Document 6.17/APP-185). Traffic impacts There has been considerable work by the Applicant with the main statutory highways consultees, notably National Highways

RR Reference	Name/Organisation	Summary of Representation	Applicant Response
			and Oxfordshire County Council (OCC) as well as Cherwell District Council (CDC) over several years to prepare a robust and comprehensive Transport Assessment (TA) (see the main report in Document 6.3A.01/AS-055). The submitted TA identifies the likely impacts of the OxSRFI scheme, and has informed the comprehensive package of mitigation proposed to minimise or avoid those otherwise likely adverse impacts, and to deliver benefits to local road-users as well as pedestrians, cyclists and public transport users. Ardley passenger station The Applicant is engaged in constructive dialogue with OCC and CDC regarding their exploration of the feasibility of a new Station, including ongoing work on a SoCG on rail issues. The Planning Statement Appendix 3 contains a Passenger Rail Station Note (Document 5.4C/AS-050) which sets out the Applicant's position with regard to the emerging potential new Station. That Note explains how OxSRFI would not prejudice the delivery of a passenger Station and includes details of the ways in which OxSRFI would potentially help enable delivery or reduce future infrastructure works and costs for those bodies who would bring it forward in due course. PFAS The Applicant is aware of the PFAS agenda locally and of the context relevant to the former Heyford Air base, and is aware that some other sites or locations nearby have identified relatively high levels of PFAS, including in the Gallos Brook. PFAS contamination is becoming increasingly common and widespread as understanding and knowledge, and the ability to test for it, improves. In response the Applicant has undertaken testing on the OxSRFI Main Site. The Applicant's work to date

RR Reference	Name/Organisation	Summary of Representation	Applicant Response
			has identified low levels of PFAS in parts of the SRFI site, considerably lower than some of the levels known to have been found at other sites nearby which have a more direct 'pathway' from the former RAF base. The results show OxSRFI site's watercourses (tributaries of the Gagle Brook – not the Gallos Brook) have been receiving PFAS from off-site. The groundwater testing also shows low levels of PFAS on-site with no evidence of any major accumulations. The submitted Construction Environmental Management Plan (CEMP) (Document 6.2C/APP-189), and associated draft DCO Requirements already make provision for dealing with contamination on-site, and the processes and approach identified would apply equally to PFAS contamination. However, the Applicant can provide the additional information to the Examination process regarding the results of the assessment and how it proposes to remediate or manage PFAS on-site (as part of an updated ES Chapter 11). Cumulative Impacts OxSRFI has undertaken a robust cumulative impact assessment as part of the ES which considers the cumulative impacts of an extensive list of planned, committed and proposed development in the vicinity of the Main Site, in addition to the OxSRFI scheme (please refer to ES Chapter 16 (Cumulative Effects) (Document 6.16/APP-184). The list of sites was informed by discussions with the local planning authority, as explained in ES Chapter 1 (Introduction) (Document 6.1/APP-169).
RR-057	Heyford Park Parish Council	Heyford Park Parish Council objects to the proposed OxSRFI development and has	Cumulative Impacts

RR Reference	Name/Organisation	Summary of Representation	Applicant Response
		raised concerns about its potential impacts on the local community, particularly when considered alongside other major developments planned or proposed in the area. The Parish Council's main concerns are: • Cumulative Development Impacts: The Council argues that the SRFI has not been adequately assessed alongside numerous nearby developments, including logistics schemes, housing proposals totalling over 9,000 homes, and the proposed Puy du Fou tourist attraction. It believes the combined effects on infrastructure, particularly the road network, are likely to exceed the assumptions used in the SRFI's transport modelling. • Noise and Light Pollution: The Council is concerned that the development would significantly affect existing and newly approved residential areas. It argues that extensive lighting associated with the warehouses and rail terminal would harm local amenity and wildlife in what is currently a relatively dark rural environment. It also considers that proposed mitigation measures, such as bunding and acoustic glazing, would not adequately address impacts on outdoor recreation	The Applicant has undertaken a robust cumulative impact assessment as part of the ES which considers the cumulative impacts of an extensive list of planned, committed and proposed development in the vicinity of the Main Site, in addition to the OxSRFI scheme (please refer to ES Chapter 16 (Cumulative Effects) (Document 6.16/APP-184). The list of sites was informed by discussions with the local planning authority, as explained in ES Chapter 1 (Introduction) (ref. APP-169 / Document 6.1). Noise and Light An assessment of potential noise and light impacts and measures to mitigate these impacts are set out in the respective ES Chapter 5 (Noise and Vibration) (Document 6.5/AS-066) and Lighting ES Chapter (Document 6.8/APP-176). ES Chapter 5 (Noise and Vibration) concludes that the embedded mitigation avoids significant adverse noise impacts both during construction and operation on existing and consented housing at Heyford Park. ES Chapter 8 (Lighting) concludes that the embedded mitigation avoids significant adverse lighting impacts both during construction and operation on existing and consented housing at Heyford Park. It also confirms the same for ecological receptors. Health Impacts The submitted Health Impact Assessment (HIA) (Document 6.12C/APP-298) assesses the health impacts and benefits from the OxSRFI scheme in terms of the queries raised. The HIA was informed by assessments within the relevant ES topics. The

RR Reference	Name/Organisation	Summary of Representation	Applicant Response
		and residents' enjoyment of open spaces. • Health Impacts: The Parish Council believes the proximity of the SRFI to residential areas and a growing community could have adverse health consequences. It cites concerns relating to: ○ Air quality impacts from freight operations and associated traffic. ○ Noise and vibration from rail freight movements. ○ Mental health and wellbeing effects arising from long-term exposure to noise and industrial activity. ○ Risks associated with the transport of hazardous materials near an expanding residential population. ○ Impacts on vulnerable groups, including elderly residents living in nearby park homes.	only exception being the transport of hazardous material as this is not proposed as part of the proposed development. It is worth noting that such measures would be subject to the relevant regulations.
RR-058	Historic England (HE)	HE has engaged with the Applicant with pre-application advice provided, with a focus solely on potential impacts on scheduled monuments and RAF Upper Heyford Conservation Area. During the pre-application stage HE recommended amendments to the proposals to lower the landscape bund and remove proposed tree planting adjacent to	There has been good and long-standing dialogue between the Applicant and HE and the lack of objection is noted and welcomed. The Applicant has discussed the omission of Troy Farm with HE and will amend the ES and given the nature of that asset and its distance from the site no significant or direct effects are considered likely. The Applicant also confirms acknowledgement of the labelling errors in the ES Tables identified. In response to these errors, the Applicant proposes

RR Reference	Name/Organisation	Summary of Representation	Applicant Response
		the eastern end of the runway at Upper Heyford to allow an understanding of the function of the runway. The Applicant made these changes which accord with HE's recommendation. HE does not object to the principle of the proposed development and broadly concurs with the Applicants ES re: historic environment issues and effects. The level of harm prescribed by the Applicant to these assets is broadly agreed, and should form part of the balancing exercise by the ExA. HE notes that the ES makes no reference to the scheduled Turf Maze at Troy Farm which lies within 2km of the Main Site, and has made the Applicant aware of this omission. HE have also identified some labelling inaccuracies in the ES (Tables 10.4, 10.6 and 10.7) where the word 'magnitude' should be used in place of 'significance'.	to submit an updated version of ES Chapter 10 (Heritage - Built and Archaeology) together with the submission of the other application change documents as explained in the Applicant's Procedural Deadline A submission Cover Letter.
RR-085	Lower Heyford and Caulcott Parish Council	The representation raises a range of concerns, focusing on transport impacts, environmental effects and cumulative development impacts. Transport	Transport The implementation of a range of relevant measures and controls embedded within the Construction Environmental Management Plan (CEMP) (Document 6.2C/APP-189) and the Construction Traffic Management Plan (CTMP) Document/6.3A.10/AS-064, pages 84 to 99) will minimise

RR Reference	Name/Organisation	Summary of Representation	Applicant Response
		The RR raises the following concerns in terms of transport: • Disruption during construction • Increase in traffic, particularly on the B4030 • Potential harm to the historic medieval Rousham Bridge from increased traffic, with calls for measures such as ANPR to restrict heavy vehicle movements. • Doubts that proposed public transport, cycling and walking improvements will offset traffic generated by up to 9,000 employees. Environmental Impacts The RR raises the following concerns in terms of environmental impacts: • Loss of productive agricultural land, mature hedgerows and wildlife habitat. • Concerns regarding PFAS contamination associated with the former Upper Heyford airbase, with fears that construction could disturb contaminated soils and watercourses, posing risks to workers, residents and the wider environment. • Objections to noise and light pollution from a 24-hour freight and warehousing operation, and its effects on local residents and wildlife.	disruption during the construction phase of the development and prevent significant adverse environmental transport effects. The proposed Middleton Stoney Relief Road and Heyford Park Link Road will deliver significant improvements and journey time reliability for drivers using the B4030 east/west (and vice versa). The operation of the B4030 corridor with the proposed Highway Works in place is assessed in detailed as part of the Transport Assessment (Document 6.3A.01/AS-055) and is demonstrated to accommodate the traffic from the Proposed Development along with all required committed and allocated development. This is agreed with OCC. Loss of agricultural land The proposed development will result in the loss of agricultural land, and this has been assessed as part of the application. In particular ES Chapter 14 (Soil Resources and Agricultural Land) (Document 6.14/AS-082) shows that a very small percentage (approximately 9%, 37.7ha) of the agricultural land is solely in the 'best and most versatile' quality. While this represents a significant adverse effect as defined by standard metrics, ES Chapter 14 confirms that as mitigation, the soils will be protected and retained on-site and will form part of the landscaping or habitat enhancement features proposed, meaning the good quality soils will be retained, albeit their use will change. A Soil Management Plan (SMP) is required by the Construction Environmental Management Plan (CEMP) (Document 6.2C/APP-189) for relevant phases of construction activity. The SMPs will be phase- and site-specific to ensure protection of

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		Concerns that the proposed mitigation measures are insufficient to protect the nationally significant dinosaur trackway SSSI, which is considered of international scientific importance. <u>Cumulative Development</u> The Parish Council argues that OxSRFI is only one of numerous major developments proposed around M40 Junctions 9 and 10, including the Heyford Park expansion, Puy du Fou, Tritax, Albion Land, Himley Village and other schemes around Bicester. Concerns are raised that the cumulative impact could fundamentally alter the region and place unsustainable pressure on infrastructure. <u>Socio-Economic Concerns</u> Questions whether the development is economically viable given the area's low unemployment rates and competition from other employment developments for labour. Concerns that local housing affordability may make recruitment difficult, potentially requiring workers to commute from further afield, undermining environmental benefits. <u>Project Delivery and Phasing</u>	the resource and best re-use of soil resources, preventing damage to soils and potential losses. Loss of mature hedgerows and wildlife habitat As set out in the Planning Statement (Document 5.4/APP-161) the Applicant proposes to plant 13.9km of new species hedgerow (over 4.1km of which will include standard trees). Some sections of existing hedgerow are proposed to be translocated within the site, including 260m in total of 'important' hedgerow. This new and translocated provision off-sets the approx. 11.3km of hedgerow to be removed and results in a positive (beneficial) effect overall. The impacts on ecology have been assessed within ES Chapter 6 (Ecology including Arboriculture) (Document 6.6/APP-174). Section 6.8 of ES Chapter 6 sets out the summary and conclusions of the assessment and highlights that through the mitigation measures proposed as part of the development, the OxSRFI scheme will deliver a Biodiversity Net Gain (BNG) in excess of 10%. PFAS The Applicant is aware of the PFAS agenda locally and of the context relevant to the former Heyford Air base, and is aware that some other sites or locations nearby have identified relatively high levels of PFAS, including in the Gallos Brook. PFAS contamination is becoming increasingly common and widespread as understanding and knowledge, and the ability to test for it, improves. In response the Applicant has undertaken testing on the OxSRFI Main Site. The Applicant's work to date has identified low levels of PFAS in parts of the SRFI site,

RR Reference	Name/Organisation	Summary of Representation	Applicant Response
		Requests assurances that the rail terminal will be delivered alongside the warehouses rather than warehousing being constructed first. Seeks guarantees that transport infrastructure improvements will be completed to an agreed timetable and not lag behind warehouse development.	considerably lower than some of the levels known to have been found at other sites nearby which have a more direct 'pathway' from the former RAF base. The results show OxSRFI site's watercourses (tributaries of the Gagle Brook – not the Gallos Brook) have been receiving PFAS from off-site. Similarly, the groundwater testing undertaken also shows low levels of PFAS on-site with no evidence of any major accumulations. The submitted Construction Environmental Management Plan (CEMP) (Document 6.2C/APP-189), and associated draft DCO Requirements already make provision for dealing with contamination on-site, and the processes and approach identified would apply equally to PFAS contamination. However, the Applicant can provide the additional information to the Examination process regarding the results of the assessment and how it proposes to remediate or manage PFAS on-site (as part of an updated ES Chapter 11). Noise and Light An assessment of potential noise and light impacts and measures to mitigate these impacts is set out in the respective Noise ES Chapter (Document 6.5/AS-066) and Lighting ES Chapter (Document 6.8/APP-176). ES Chapter 5 (Noise and Vibration) concludes that the embedded mitigation avoids significant adverse noise impacts both during construction and operation on receptors in Lower Heyford and Caulcott. ES Chapter 8 (Lighting) concludes that the embedded mitigation avoids significant adverse noise impacts both during

RR Reference	Name/Organisation	Summary of Representation	Applicant Response
			construction and operation on receptors in Lower Heyford and Caulcott. It also confirms the same for ecological receptors. SSSI The Applicant has considered the potential for dinosaur footprints to be found on-site during construction, and has proposed a 'watching-brief' during relevant construction works (secured by draft DCO Requirement 13(3)). Given the very limited areas of appropriate geology which will be disturbed on-site, the Applicant is of the view that such finds are of low probability, but the watching brief is considered an appropriate and proportionate mitigation response. The Applicant notes and welcomes the positive response of Natural England (RR-101) who have confirmed agreement to the Applicant's approach to avoiding or mitigating potential effects on the nearby SSSI. Cumulative Impacts The Applicant has undertaken a robust cumulative impact assessment as part of the ES which considers the cumulative impacts of an extensive list of planned, committed and proposed development in the vicinity of the Main Site, in addition to the OxSRFI scheme (please refer to ES Chapter 16 (Cumulative Effects) (Document 6.16/APP-184). The list of sites was informed by discussions with the local planning authority, as explained in ES Chapter 1 (Introduction) (Document 6.1/APP-169). Socio-Economic As set out in ES Chapter 12 (Socio-Economics – including Health) (Document 6.12/APP-180), in 2024 Cherwell's unemployment rate was 1.6% below the sub-regional (3.6%)

RR Reference	Name/Organisation	Summary of Representation	Applicant Response
			and national rates (3.8%). However, the ES Chapter 12 also concludes that Cherwell is a net exporter of people commuting out of the district for work. OxSRFI therefore represents an opportunity to support more sustainable patterns of travel to work, reducing the need to travel through additional job creation within the District. Project Delivery and Phasing The draft DCO includes requirements to ensure that the rail terminal and highways infrastructure is delivered at appropriate times alongside the proposed warehousing. Requirement 5 from the Draft Development Consent Order (Document 3.1/APP-139) sets out that no more than 232,258 square metres of warehousing may be occupied before the rail terminal is operational. Occupation of warehousing before the rail terminal is operational is supported by the National Policy Statement for National Networks (paragraph 4.88). Requirement 8 of the Draft Development Consent Order (Document 3.1/APP-139) sets out timescales for the delivery of highways infrastructure (these are either before any warehousing is occupied or before 185,806 square metres of warehousing is occupied).
RR-097	Mid-Cherwell Neighbourhood Plan Forum (MCNP)	The MCNP forum is concerned that there has been little research into the Socio-Economic and Demographic impacts of this development in an area of low employment and minimal relevant skill-sets germane to the operation of this facility. MCNP is commissioning research to produce	The Applicant acknowledges that this RR is now superseded by RR-098. Therefore please see the Applicant's response to RR-098 below, also submitted by MCNP.

RR Reference	Name/Organisation	Summary of Representation	Applicant Response
		evidence on this topic area with a view to submitting this data to the Examiners.	
RR-098	Mid-Cherwell Neighbourhood Plan Forum (MCNP)	After advice from Oxfordshire County Council, the MCNP original submission to PINS (reference number FA09CB9EC) based on concerns about demographics and socio-economics is now superseded by this representation. The 9 topic areas of concern (not in priority order) include: • Local policies affected by this DCO • Cumulative Harms in the area • Noise and Light Pollution • Infrastructure • Security • Use of the Warehouses • Rail • Commercial viability • Health	The Applicant understands from this RR (RR-098) that it supersedes that referred to above (RR-097) which focuses on demographic and socio-economic issues. The RR on the PINS website provides no detail about any of the 9 topics listed. However, the Applicant has addressed each of these topics through the detail submitted in the documents referred to below: • Local policies affected by this DCO – please see the Planning Statement (Document 5.4/APP-161) • Cumulative Harms in the area – please see ES Chapter 16 (Cumulative Effects) (Document 6.16/APP-184) • Noise and Light Pollution – please see ES Chapters 5 (Noise and Vibration) (Document 6.5/AS-066) and 8 (Lighting) Document 6.8 APP-176) • Infrastructure – the specific element of ‘infrastructure’ referred to is not stated but the assessment and justification for the proposed highways works is set out in ES Chapter 3 (Transport) (Document 6.3/APP-171) • Security – please refer to the Design Approach Document (DAD) for the Main Site (Document 5.5A/APP-166) • Use of the Warehouses – please refer to the Design Approach Document (DAD) for the Main Site (Document 5.5A/APP-166) and the Planning Statement (Document 5.4/APP-161)

RR Reference	Name/Organisation	Summary of Representation	Applicant Response
			• Rail – please refer to the Rail Report (Document 7.2A/APP-312) • Commercial viability – please refer to the Market Analysis Report (Document 7.1/APP-311) • Health – please refer to the Health Impact Assessment (HIA) (Document 6.12C/APP-298)
RR-099	Middleton Stoney Parish Council	Middleton Stoney Parish Council objects that OxSRFI would have a significant adverse impact on the village and surrounding rural area. Key concerns include: • Traffic and congestion: Existing congestion at the B430/B4030 traffic light junction is already severe during peak periods, and the village road network is considered incapable of accommodating additional HGV traffic. • Cumulative development impacts: The proposal has not been adequately assessed alongside other planned developments, including the Baynard's Green warehousing proposals, the proposed Puy du Fou theme park, and the expansion of Heyford Park. • Purpose of development: The Parish Council considers the rail terminal to be in an unsuitable location and argues that the scheme is primarily a	Traffic and congestion The OxSRFI proposals include a Heyford Park Link Road and a Middleton Stoney Relief Road to remove vehicular traffic travelling East – West from Middleton Stoney. Highways modelling indicates that following completion of the development, traffic flows at the B430/B4030 junction in Middleton Stoney will decrease, with a material reduction in congestion at the crossroads. This will allow new and improved pedestrian facilities to be provided at the crossroads, and these improvements form part of the development proposals (see Figure 11.10 of the TA Document 6.3A.01/AS-055). HGVs travelling to and from OxSRFI will not be permitted to travel through Middleton Stoney. This will be enforced by height restriction at the site access and ANPR cameras. All OxSRFI HGV traffic will be required to access OxSRFI from M40 Junction 10 (see HGV Routeing Strategy - Document 6.3A.02/APP-056, pages 518 to 532). Cumulative impacts The Applicant has undertaken a robust cumulative impact assessment as part of the ES which considers the cumulative impacts of an extensive list of planned, committed and proposed development in the vicinity of the Main Site, in addition to the OxSRFI scheme (please refer to ES Chapter 16

RR Reference	Name/Organisation	Summary of Representation	Applicant Response
		warehousing development, which would generate significant additional traffic and adversely affect local communities. • Employee travel impacts: It is claimed that insufficient consideration has been given to the projected 9,000 daily employee movements associated with the development.	(Cumulative Effects) (Document 6.16/APP-184). The list of sites was informed by discussions with the local planning authority, as explained in ES Chapter 1 (Introduction) (Document 6.1/APP-169). The Application responds directly to the 'compelling need' for additional SRFIs identified by national policy (the NPS) which explicitly seeks to enable an expanded network of SRFIs across the regions. The Applicant's strategic case in support of the Proposed Development and the location is set out in the Planning Statement (Document 5.4/APP-161), and the Market Analysis Report (Document 7.1/APP-311), supported by the GBRailfreight Supporting Statement (Document 7.2B/APP-313). In addition to the need established by the NPS, there is a recognised need for strategic logistics in this part of the M40. The Applicant has concluded that the OxSRFI will help to expand the network of SRFIs, meeting the needs of a market area currently poorly served. Travel impacts There has been considerable work by the Applicant with the main statutory highways consultees, notably National Highways and Oxfordshire County Council (OCC) as well as Cherwell District Council (CDC) over several years to prepare a robust and comprehensive Transport Assessment (TA). The submitted TA identifies the likely impacts of the OxSRFI scheme, and has informed the comprehensive package of mitigation proposed to minimise or avoid those otherwise likely adverse impacts, and to deliver benefits to local road-users as well as pedestrians, cyclists and public transport users.
RR-100	National Highways (NH)	With regard to traffic impacts of OxSRFI, the RR refers to the collaborative work over	As reflected in this RR, the Applicant has worked extensively in collaborative dialogue and technical work with NH over several

RR Reference	Name/Organisation	Summary of Representation	Applicant Response
		several years between Applicant and NH, and references the extensive strategic, microsimulation and local modelling undertaken and reviewed in depth by NH and its technical consultants. NH confirms it is content with the modelling carried out of the forecast impacts, and that the modelling shows the proposed mitigation will be effective at M40 J10, and J9, and on the A43 to Baynard's Green. The RR sets out some unresolved queries or potential concerns under 5 headings set out below: a) The need for a Road Safety Audit (RSA) for the proposed works at M40 J10 and J9, and on the A43 from M40 J10 to Baynard's Green, and for all departures from standard to be agreed. The RR confirms the RSA brief has been agreed, and that the Audit is likely to have been completed before Examination begins. NH also confirms it has not completed its review of the Walking, Cycling and Horse-Riding assessment (WCHAR). b) Proposals for works at Barleymow roundabout are not yet agreed, but the principle is supported by NH. Collaborative dialogue is ongoing including re: further preliminary design	years in preparing the submitted Transport Assessment (TA) (ES Appendix 3.1, Document 6.3A.01/AS-055). The Applicant is in ongoing constructive dialogue with NH to advance the final few outstanding points set out in the RR, none of which are considered fundamental. The 'in-principle' support of NH to the proposed mitigation, including at the Barleymow junction, and construction and phasing proposed is welcomed. As noted, the Stage 1 RSA brief has been approved by NH and the Audit is currently underway, and is expected to have been completed prior to the commencement of the examination. It is typical that some changes to the highway design will be necessary following the Stage 1 RSA and the ExA will be kept up to date on this. Similarly, the departures from standard are in progress and it is likely that all of those related to the road layout/geometry will be with NH for formal review before the start of the examination. The Applicant is awaiting any outstanding comments on the WCHAR (none have been provided to date, and an earlier verbal indication of agreement had been provided) but having discussed this with NH (in September 2026) it is understood only a few final points may remain. This notwithstanding, the Applicant notes that DMRB GG 142 does not require the WCHAR Assessment Report to be 'approved' by NH. The preliminary design for the proposed intervention at the Barleymow roundabout has been further developed based on the recently completed topographical survey. This has been submitted to NH along with updated modelling of the operation

RR Reference	Name/Organisation	Summary of Representation	Applicant Response
		works as part of the proposed 'monitor and manage' approach. c) Some outstanding questions on phasing, construction traffic and construction management. The proposed 2 phase approach to infrastructure delivery is supported in principle, but some further information is requested by NH including re: proposed triggers for some elements of the infrastructure works. NH has not yet concluded a review of the outline Construction Traffic Management Plan and has requested more detail about assumed construction traffic flows. d) The RR confirms NH's general support for the OxSRFI Travel Plan (TP) and the ambitious but achievable mode share targets set. The RR raises detailed points re: monitoring periods and the process for amending TP interventions if required post-operation of OxSRFI via the Sustainable Transport Working Group. e) Book of Reference queries re: various NH land parcels and powers sought by the Applicant, including some proposed Compulsory Acquisition. NH queries the proposed approach to some land	of the junction. The Applicant welcomes NH's collaborative approach to conclude work on this matter – including the specific detail of the 'monitor and manage' strategy - and the ExA will be kept up to date on this. The Applicant is currently liaising with NH to understand what additional information they require with regards to construction traffic so that this can be provided. Prior to submission the Applicant amended the CEMP in response to NH's statutory consultation response in 2025. The Applicant is currently liaising with NH to understand the detail of any further or outstanding comments. Regarding the query at 4.2.1(a) of the RR about the phasing of the Highway Works at M40 J9, these works are not triggered until the Middleton Stoney Relief Road is provided (part of the Phase 2 works). Until that time the existing congestion at the Middleton Stoney crossroads junction means traffic does not reroute to the B430. However, once the MSRR is provided, the congestion at the crossroads junction is removed and hence the B430 becomes a more attractive route for A34 to A43 traffic. Therefore, the M40 J9 works are provided at that time to address this and keep longer distance traffic on the SRN rather than using the B430. TA Chapter 12 (ES Appendix 3.1, Document 6.3A.01, AS-055) assesses the operation of the highway network in the 2031 Opening Year (with the Phase 1 development and Phase 1 highway works) and confirms there would be only minor changes in the operation of M40 J9 in the 2031 Opening Year (no severe impacts). This therefore supports the delivery of the improvement works at M40 J9 as part of the Phase 2 works.

RR Reference	Name/Organisation	Summary of Representation	Applicant Response
		plots (set out at paragraph 5.2 of the RR), and dialogue is ongoing with the Applicant. f) DCO and Protective Provisions (PPs) proposed to the benefit of NH but which are not all agreed (alternative PPs are proposed by NH in the RR). Agreement is required to ensure PPs would fully secure the protection needed while also seeking to enable quick and efficient delivery of the Proposed Development. Detailed comments are set out in Section 6 of the RR relevant to draft DCO Articles and Requirements.	At 4.2.1(b) of the RR, NH seek clarification on whether there is overlap between the Phase 2 and Phase 1 Highway Works and what impact this has in terms of construction flows and traffic management sections. In that regard, Appendix 1 of the CEMP (Document 6.2C/APP-189), provides the construction programme and shows there is some overlap of the Phase 1 and Phase 2 Highway Works. However, there is no overlap of the main components of the Phase 1 and Phase 2 Highway Works at M40 J10 and Baynard's Green and hence construction traffic flows and traffic management between the phases will be minimised. As set out in Section 10 of the CEMP, details of the traffic management will be set out in the P-CEMP for each phase and agreed with NH. NH seeks signposting to where the Phase 1 Highway Works are assessed to accommodate the Phase 1 development traffic. The operation of the road network with the Phase 1 Highway Works and the phase 1 development traffic is assessed at Chapter 12 of the TA (Document 6.3A.01/AS-055). This includes VISSIM assessment of the M40 J10 and Baynard's Green junction complex, and a separate assessment of M40 J9, and confirms that the Phase 1 Highway Works will satisfactorily accommodate the forecast phase 1 development traffic. The Framework Travel Plan was developed and agreed with OCC, and NH had previously not provided detailed comments when consulted. The proposed monitoring periods are in accordance with OCC's Travel Plan guidance (biennial monitoring and 5 years of monitoring post full occupation) to be secured via a S106 obligation. Opening is anticipated in 2031 with completion in 2034, meaning five years post full occupation is 2039.

RR Reference	Name/Organisation	Summary of Representation	Applicant Response
			Paragraph 7.18 of the Framework Travel Plan (Document 6.3B/APP-203) sets out that monitoring would continue should mode share targets not be achieved, with subsequent paragraphs setting out the process for further steps that could be taken to incentivise the use of sustainable travel, if required. The Applicant is liaising with NH to clarify NH's position on these Travel Plan points. Future management and shaping of the TP would be via the Sustainable Transport Working Group (STWG), and if NH wishes to be a member (as now indicated), the Applicant would welcome this. The STWG protocol (which includes invited parties) has been agreed via the TWG but can be amended appropriately. With regard to the land and rights acquisition requirements, as NH states, ongoing discussion is being held in respect of the arrangements relating to the land. The Applicant's intention, which has been discussed with NH, is: i) No compulsory acquisition is required on the adopted SRN because the Applicant does not require land interests to carry out the highway works, the DCO highway powers will provide those necessary consents; ii) The protective provisions will govern the land arrangements for parcels of land which are currently owned by NH but which are not at this stage part of the adopted SRN, and which will become adopted highway – the intended mechanism is that NH agrees in the protective provisions that the highway works can be carried out and the land will be adopted. This will mean that the Applicant does not require land interests and can agree not to exercise powers of compulsory acquisition over those plots. The Applicant is continuing to seek agreement with NH on this drafting;

RR Reference	Name/Organisation	Summary of Representation	Applicant Response
			iii) Parcels of NH land which are required but which aren't part of the SRN or NH operational land will be covered by a voluntary land agreement. This agreement has not yet been progressed and the Applicant will continue its endeavours to progress with NH. Until that time, the compulsory acquisition powers need to be retained. The Applicant's responses to NH's comments on the dDCO and protective provisions is included at Appendix A.
RR-101	Natural England (NE)	The RR focuses on those issues relevant to NE's statutory remit which are defined in the RR as follows (albeit not all of these issues are directly relevant to OxSRFI): • Internationally designated sites • Nationally designated sites • Protected species • Biodiversity Net Gain • Nationally Designated Landscapes • Soils and best and most versatile agricultural land • Ancient Woodland and ancient/veteran trees. The RR cross-refers to the ongoing engagement with the Applicant re: various Letters of No Impediment (LoNIs) and SoCG. The RR uses a 'red, amber, green' system to indicate their current position on relevant headings, with amber indicating more information is required. No 'red'	The Applicant welcomes the positive and constructive response by NE which reflects the work undertaken over a long period under the NE Discretionary Advice Service. The Applicant's responses to the main issues covered in the RR are: • Internationally designated sites – the Applicant welcomes the NE's agreement with the submitted ES and SHRA which identifies no likely significant effects to the SAC from changes to Air Quality. • Nationally designated sites – the methodological and presentational points regarding the assessment of potential effects on the Ardley Cutting SSSI are noted, and have been discussed with NE since receipt of the RR. Albeit understood that the changes suggested will not affect the overall conclusions reached regarding likely residual effects on the SSSI, the Applicant has agreed to make amendments to the ES Chapter 6 regarding how certain elements of the proposal are considered ('additional' as opposed to 'embedded') to further aid NE's consideration of the proposals. • Protected species – the Applicant welcomes the constructive work to date, and ongoing dialogue, with NE including re: the already issued LoNIs.

RR Reference	Name/Organisation	Summary of Representation	Applicant Response
		issues are identified by NE. Key issues (focused on 'amber' points) identified are: • Internationally designated sites - this is flagged as green by NE. Only 1 internationally designated site has been identified as subject to potentially significant effects (Oxford Meadows SAC). • Nationally designated sites – this is flagged as Amber by NE, and is focused on the impacts on the Ardley Cutting and Quarry SSSI. With reference to the NPS, NE seek clarity regarding the assessment methodology in the ES Ecology assessment and interactions with BNG related measures which also form part of the proposals. NE request a change to set out potential effects on the SSSI without the benefit of compensatory measures which it considers as 'additional' mitigation as opposed to 'embedded' mitigation. This will enable a more straight-forward consideration of how the mitigation hierarchy has been followed. The RR also confirms NE agreement with the principle of the proposed compensation for effects on parts of the SSSI through creation of calcareous grassland	• Nationally Designated Landscapes – NE's RR reflects the site's location outside of any designated landscape. • Soils and best and most versatile agricultural land – DCO Requirement 13(1) (see Document 3.1/APP-139) already includes the requirement to submit a soil management plan. In addition, the submitted CEMP (Document 6.2C/ APP-189) already refers to the need for a SMP, and could be amended to incorporate the points proposed by NE. • Geological Features: The replacement rock faces would expose the same White Limestone Formation succession currently visible within the affected section of Ardley Cutting SSSI. The design objective is to retain exposure of the full stratigraphic sequence so that the notified geological succession remains available for observation, study and fossil discovery. Although the length of continuous exposure may be reduced in some locations, this would be offset by newly created rock faces exposing the same geological sequence. The replacement exposures would be of a similar height and, where practicable, would provide the full stratigraphic succession. As the scientific interest of the site relates to the exposure of the White Limestone Formation rather than the preservation of specific rock faces, fresh exposures may maintain or potentially enhance opportunities for geological investigation by providing clearer sections than existing weathered faces. • The detailed design of the replacement rock faces is still being developed, but it will align with Natural England's guidance on geoconservation in railway cuttings (NE789: Geoconservation: Principles and Practice). The Applicant acknowledges that some replacement exposures would be

RR Reference	Name/Organisation	Summary of Representation	Applicant Response
		within the scheme (but seeks clarification on the area to be provided in compensation for the losses). With regard to geological features and ES Appendix 11.10 re: Jurassic Rock Exposure, the RR seeks further details regarding how the proposed replacement rock exposures would replicate the resulting effects of the losses – and of the proposed replacements outside the current SSSI boundary - and maintenance of scientific integrity. The RR also refers to the Ardley Trackways SSSI and cross-refers to ES Appendix 11.9. NE confirms agreement with the Applicant's approach to have a watching brief for those areas where excavations may interact with relevant geology. • Protected species – this is flagged as Green based on the progress made with LoNIs from NE, coupled with NE standing advice. The RR also welcomes the commitment to delivering BNG. • Nationally Designated Landscapes - this is flagged as Green which reflects the sites location outside of any designated landscape. No detailed	located outside the current SSSI boundary; however, provisions will be made to maximise the extent, visibility and accessibility of replacement exposures and to ensure their long-term value. While designation decisions remain a matter for Natural England, the Applicant welcomes discussions regarding future management arrangements (of the SSSI and any new rock exposures). Overall, the proposed works would not remove the geological resource itself but would reconfigure rock exposures within the White Limestone Formation, with mitigation focused on maintaining equivalent exposures of the notified geological succession for future scientific study. • Ancient Woodland and ancient/veteran trees – the lack of any concerns or detailed comments or concerns from NE is noted. The Applicant is however making updates to the submitted BNG Assessment (Documents 6.6I.01 and 6.6I.02/AS-072 and AS-073) and Draft HMMP (Document 6.6K/AS-075) to correct identified errors including regarding veteran trees. A veteran tree mitigation strategy will be produced and appended to the BNG Report – the updated report will be provided as set out in the Cover Letter for Procedural Deadline A. This will outline a bespoke strategy to compensate the loss of irreplaceable habitats and conserve ecological function that covers habitat creation, long-term management and monitoring. The Applicant's responses to NE's comments on the dDCO are contained in Appendix A.

RR Reference	Name/Organisation	Summary of Representation	Applicant Response
		comments or concerns are made by NE. • Soils and best and most versatile (BMV) agricultural land – this is flagged as an Amber issue with reference to the likely loss of some BMV land. The RR suggests a requirement for a Soil Management Plan (SMP) under DCO Requirement 13 and suggests what should be required in the SMP. • Ancient Woodland and ancient/veteran trees – this is flagged as Green to signify no detailed comments or concerns from NE. NE's comments on the dDCO are summarised in Appendix A.	
RR-106	NORA	The RR raises concerns in relation to visual and environmental impacts, and traffic congestion at M40 J10/ A43/ B4100/ Baynard's Green. The RR highlights that Cherwell District Council previously refused a nearby Baynard's Green warehousing schemes on the grounds of landscape harm, ecological damage and traffic congestion. The RR highlights three concerns:	The Applicant acknowledges there are two NORA RRs (also see RR-107 below). In relation to concerns about M40 J10, the Applicant considers that highways strategy for the OxSRFI scheme, which includes the delivery of improvements to M40 J9 and J10, as well as the Ardley Bypass and Middleton Stoney Relief Road, will direct vehicles accessing the Main Site to use the strategic highways network instead of local roads. The significant improvements at M40 J10 have been appropriately assessed and are explained within ES Chapter 3 (Transport) (Document 6.3/APP-171).

RR Reference	Name/Organisation	Summary of Representation	Applicant Response
		• Harm – the RR raises concerns about issues previously used for the refusal of the warehouses at Baynard's Green, which include harm to visual impact and landscape character, destruction of open countryside, ecological impacts and traffic congestion. • The appeal position of Cherwell District Council in relation to the warehouses at Baynard's Green. • Cumulative impacts in consideration of the warehouses at Baynard's Green.	Impacts on ecology from the OxSRFI scheme are assessed within ES Chapter 6 (Ecology including Arboriculture) (Document 6.6/APP-174). The landscape and visual impacts from the OxSRFI scheme been assessed in ES Chapter 7 (LVIA) (Document 6.7/APP-175). The Applicant notes that the principle of SRFI development needing to be located in countryside locations in order to be appropriately located relative to the markets they serve, and/or to ensure appropriate connectivity, is accepted by the NPS (see paragraph 4.81). The cumulative effects of the OxSRFI scheme in consideration of other schemes within the locality of the Main Site are included within each ES topic, with ES Chapter 16 (Cumulative Effects) (Document 6.16/APP-184) providing a summary of these assessments.
RR-107	NORA	NORA's main concern with the OxSRFI proposals is that there are unprecedented levels of development in one small part of Cherwell (with other warehousing proposals and a new town also proposed nearby) which will be overwhelming for rural communities, commuters who use these routes daily and residents of local towns who use the woodlands, bridleways/footpaths and open space to	The Applicant acknowledges there are two NORA RRs (see RR-106 above). The Applicant also acknowledges the comments and concerns raised. The OxSRFI scheme has been informed by an Environmental Statement (ES) which has assessed the effects across several topics, including traffic and transport, and noise, air and light pollution. As a result of these environmental assessments, the Applicant has committed to several measures to mitigate impacts and thereby reduce the overall residual effects from the OxSRFI scheme (please refer to the Planning Statement (Document 5.4/APP-161)), and Chapter 17 of the ES

RR Reference	Name/Organisation	Summary of Representation	Applicant Response
		walk, ride and find balance between busy working lives and leisure time. Along with Puy du Fou, warehousing at Baynard's Green and Hawkwell Village, local residents face unprecedented light, noise and air pollution if all developments (or even one) goes ahead. The OxSRFI will undoubtedly add to these pressures, and NORA will be campaigning for mitigation. In January, at the Cherwell Planning Committee meeting (for Baynard's Green warehouse developments) there was no mitigation allowed for local residents as this caused considerable upset. The RR identifies measures NORA feels are necessary by way of mitigation, with specific reference to NORA's intention to campaign for ANPR cameras for local villages to ensure that small village roads are not used as rat runs for HGVs and workers for the proposed sites. The Stratton Audley Rd (connecting B4100 to A4221) receives a heavy number of HGV and worker-traffic to the HS2 site. Danger to residents and damage to roads have been observed and measured. When there is a traffic incident on the M40 or A34, villages see sudden and unpredictable increase in traffic, often leading to jams and dangerous driving as people desperately	(Summary of Effects) (Document 6.17/APP-185). Details of the proposed ANPR cameras to be delivered as part of the scheme to restrict HGV movement on local roads are explained within paragraphs 4.79-4.84 of the Transport Assessment – part 1 of 11 – Report and Appendix 1 (Document 6.3A.01/AS-055). Reference to how the M40 Junction 9 improvements can reduce 'rat-running' and an accident 'hotspot' is also explained within paragraph 11.124 of Transport Assessment – part 1 of 11 – Report and Appendix 1 (Document 6.3A.01/AS-055). The cumulative effects of the OxSRFI scheme in consideration of other schemes within the locality of the Main Site are included within each ES topic, with ES Chapter 16 (Cumulative Effects) (Document 6.16/APP-184) providing a summary of these assessments.

RR Reference	Name/Organisation	Summary of Representation	Applicant Response
		try to find alternate routes to their work or other destination. With more development coming, residents of Stoke Lyne, Bainton, Bucknell, Ardley, Somerton, Fritwell, Baynard's Green (and more) are anxious about increased traffic.	
RR-109	Oxfordshire County Council	Due to the nature and length of the RR, and also the extent of response provided by the Applicant, RR-109 has been summarised within Appendix B .	Due to the nature and length of the RR, and also the extent of response provided by the Applicant, RR-109 has been summarised within Appendix B .
RR-136	The Gardens Trust	The Gardens Trust will wish to comment on any impact from the proposals on any registered park and garden.	ES Chapter 10 (Heritage - Built and Archaeology) (Document.6.10/APP-178) and the accompanying appendices (10.6 – Document 6.10F/APP-281, and 10.7 – Document 6.10G/APP-282) assesses the impact from the OxSRFI proposals on the Middleton Park (Grade II Registered Park and Garden) (referred to as ref. BHR6) and states that the development would not be highly visible to the Park and Gardens with a large area of agricultural land remaining between the Park and Gardens and the Application Site. The landscaping strategy, particularly along the southern boundary of the Main Site, would mean the temporary and permanent impacts on the Park and Gardens would be negligible adverse and not significant in EIA terms. In terms the Rousham Park and Gardens (Grade I), these are outside the 2km wide Study Area for the OxSRFI scheme due to their distance from the Application Site. Also see the response to RR AS-088 below.

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RR-140	Upper Ouse Water Management Board (WMB)	The WMB maintain the watercourse (Upper Padbury Brook) which flows beneath the A43/M40 junction and which receives surface water flows from the motorway junction. To maintain the watercourse the WMB require access to the banks at any time. The RR notes that the proposal is proximate to, and immediately upstream of, the Board's district. Any surface water or treated foul water discharge proposed to a watercourse in the WMB district requires Land Drainage Consent, and may also require payment of a surface water drainage contribution. In the absence of available drainage plans, WMB cannot confirm whether the Board's involvement would be necessary to protect its flood risk management activities, or whether the DCO needs to make provision for such ongoing activities. WMB request to be contacted by the Applicant if their involvement is required.	The Applicant has liaised directly with the Upper Ouse Water Management Board (WMB) following submission of their RR. The WMB's district is located approximately 2km downstream of the DCO limits along the Padbury Brook. In liaison with the WMB the Applicant understands that, despite it being outside of their district, the WMB maintain the Padbury Brook up to the A43 culvert as part of a private maintenance agreement. The Applicant understands therefore that the WMB's byelaws do not apply, but will continue to work with the WMB to confirm that the J10 highway improvements, which include widening of the A43 over the Padbury Brook and extending the culvert, do not adversely impact the ability of the WMB to access and maintain this watercourse. The proposed highway works (specifically the J10 highway improvements) fall within the natural catchment of the Padbury Brook and appropriate mitigation is proposed to serve any new hardstanding so that flows are appropriately treated and restricted such that contribution will not increase flows within the WMB district. Further dialogue is planned between the parties, and it is anticipated that these points will be recorded in the statement of common ground.
RR-144	Value Retail Management (Bicester Village) Limited (Value Retail)	The RR raises potential highways concerns, in particular: the robustness of the trip generation, distribution and assignment assumptions used to assess the proposed development;	The trip generation, distribution and assignment assumptions are agreed with National Highways and Oxfordshire County Council (OCC). The Applicant notes OCC comments in their relevant representation (RR-109) that <i>"...the impacts of the development have been very thoroughly and robustly assessed..."</i>.

RR Reference	Name/Organisation	Summary of Representation	Applicant Response
		- the modelling of M40 Junction 9 and the A41 corridor, including the extent to which peak visitor periods and seasonal traffic conditions have been appropriately represented; - the adequacy, deliverability and phasing of any proposed mitigation measures relied upon to address highway impacts; and - the cumulative assessment of committed developments and other strategic-scale proposals in the local area, including the interaction of those schemes with the proposed OxSRFI development.	The traffic modelling at M40 Junction 9 is agreed with National Highways and OCC. The Applicant notes National Highways comments in their relevant representation (RR-100) that <i>“The Applicant team has worked collaboratively with National Highways over several years to demonstrate the forecast impact of the proposed development on the SRN and to develop appropriate mitigation solutions. Extensive strategic, microsimulation and local modelling has been undertaken, which has been reviewed in depth by National Highways and its technical consultants. National Highways is content that the modelling has been carried out appropriately and forecast impacts on the SRN have been demonstrated satisfactorily. Further, National Highways agrees that the modelling shows that the proposed mitigation measures are effective in accommodating the increased traffic expected from the proposed development on the M40 at Junction 10 and Junction 9 and on the A43 between M40 Junction 10 and Baynard’s Green Roundabout.”</i> The modelling of the A41 corridor is agreed with OCC. Further, as discussed at paragraph 9.75 of the TA (Document 6.3A.01/AS-055) and shown on the traffic flow difference plots at Figures 9.7 and 9.8 of the TA, one of the effects of the proposed Highway Works is a forecast reduction in traffic using the A41 between Junction 9 and Bicester Village. This is because existing traffic that would otherwise use the A41 to access the M40 at Junction 9, reassigns to use the improved B4030, MSRR, and Ardley Bypass route to access the M40 at Junction 10. The TA assesses the highway peak periods, as agreed with National Highways and OCC. However, the beneficial effects of the Highway Works would also be felt

RR Reference	Name/Organisation	Summary of Representation	Applicant Response
			during other times of day and year – for example during weekends when visitors to Bicester Village are likely at their peak. The adequacy and phasing of the proposed Highway Works is agreed with OCC. As above, National Highways have also confirmed the adequacy of the proposed mitigation, and whilst they have requested some further clarifications regarding the phasing of the highway works at M40 Junction 9, the Applicant has provided that information (see the Applicant's response to RR-100 in the table) and is confident that this will be to the satisfaction of National Highways. No departures from standards are required for the proposed Highways Works at M40 Junction 9. The design of the scheme remains subject to the findings of the Stage 1 Road Safety Audit, which is expected to be concluded prior to the start of the Examination. The TA is explicitly based on a comprehensive assessment of 'cumulative' transport and traffic issues, considering all committed and consented development (local plan sites and planning permissions)– the approach is a direct response to constructive working via the Transport Working Group (TWG) of National Highways, OCC Highways and Cherwell District Council. Furthermore, the approach takes due account of emerging live planning applications (which are not committed or approved) as agreed with the TWG. The Applicant has also engaged where required to share highways data with Puy du Fou and Dorchester Living (the developer of Heyford Park) to enable them to also engage in appropriate cumulative assessments.

RR Reference	Name/Organisation	Summary of Representation	Applicant Response
RR-147	Wendlebury Parish Council	Wendlebury Parish Council's main concern relates to the impact of the development on Junction 9. In particular they are concerned that if Junction 10 is upgraded before Junction 9 is upgraded (during the construction phase of Junction 10), Junction 9 will be placed under more extensive pressure.	The traffic management (TM) measures that will be put in place at M40 J10 during the construction of the Highway Works will be agreed with National Highways and other stakeholders as part of the P-CEMP process, as described in the CEMP (Document 6.2C/ APP-189). A key consideration of the TM strategy will be maintaining lane capacity at M40 J10, except where traffic flows allowed (for example overnight). Hence capacity at M40 J10 during the construction works would not be reduced to a point that would impact M40 J9.
AS-088	The Garden Trust	The Representation consists of a letter dated 29 th October from the Garden Trust to Cherwell District Council Planning regarding the planning application at Heyford Park (reference 25/02190/HYBRID). The letter which forms the basis of this RR makes on comments about the OxSRFI proposals or submitted application material.	This RR consists of a response to the Heyford Park residential led ('new town') application which is registered with Cherwell District Council and being subject to ongoing consultation and consideration ahead of formal determination. As the RR makes no reference to the Proposed Development the Applicant has no response.
AS-089	British Horse Society	The RR states that the existing (public rights of way) off-road availability in this local area is fragmented and limited and that this lack of connectivity leaves equestrians with no viable alternative but to use the public highway. BHS state that the protection of current links and the creation of new link is vital to address this fragmentation and provide safe, off-road access. BHS raise concerns under five headings:	Paragraphs 4.22 to 4.31 of the TA (Document 6.3A.01 AS-055) summarise the Applicant's public rights of way (PRoW) strategy. As described in that summary, the Applicant agrees with the BHS assessment that the <u>existing</u> PRoW network in the local area is fragmented and suffers from severance. However, the Applicant disagrees with BHS assessment of the OxSRFI PRoW proposals. To the contrary, addressing fragmentation and severance has been a key objective in the development of the PRoW strategy. 1. <u>Severance and downgrading:</u> The WCHAR Assessment Report (Document 6.3A.02/AS-056, pages 336 to 452), sets out the opportunities associated with

RR Reference	Name/Organisation	Summary of Representation	Applicant Response
		1. <u>Severance and downgrading of definitive rights to permissive status</u> Concern with Schedule 5, Part 1 of the dDCO with regard to public bridleways 109/28, 109/29 (part) and 109/30 being replaced with permissive shared use cycle tracks, and concern that public bridleway 109/26 is not provided with a substitute. Request for re-provision of peripheral routes legally dedicated as permanent public bridleways. 2. <u>Equestrian safety risks from major infrastructure and heavy plant traffic</u> Concern that the proposed Environmental Weight limit could still allow access for development HGV traffic and result in HGV traffic intersecting with local lanes like Somerton Road and Ardley Road. Requests that the HGV Routeing Strategy and all P-CEMPs incorporate a complete physical separation, including acoustic and visual screening, between heavy construction activity and public bridleways. 3. <u>Protection of connectivity during multi-year construction phases</u>	the Proposed Development to improve walking, cycling and horsing riding facilities and connectivity in the local area. WCHAR Opportunities 12 and 13 directly relate to the provision of alternative bridleway routes to bridleways 109/29, 109/28, and 109/30 within the Main Site area. Opportunity 29 and 1 directly relate to the provision of an alternative bridleway route for bridleway 109/26. The resultant extended bridleway network that would be provided by the scheme is summarised at the fifth and sixth and tenth to twelfth bullet points of paragraph 4.29 of the TA, and the WCHAR Review Report (Document 6.3A.02/AS-056, pages 453 to 474) confirms that these opportunities have been realised as part of the proposed works. The Proposed Development will provide over 4.5km of additional bridleway network, providing improved east-west, and south-north bridleway connectivity, and thereby reducing the fragmentation of the bridleway network in the local area. These will be dedicated bridleways and not permissive routes. Therefore, whilst the proposed new bridleway route around the perimeter of the site (which is to be dedicated and not permissive) is not a legal replacement of the existing route (e.g. substituting A – B for X – Y), the Applicant considers that the perimeter bridleway alternative provides a replacement and betterment of bridleway provision as a whole. It is noted that the BHS RR is in contrast to comments provided by BHS at the Stage 1 Consultation (see paragraph 3.104 of the WCHAR Assessment Report (Document 6.3A.02/AS-056, pages 336 to 452) where the BHS commented that the

RR Reference	Name/Organisation	Summary of Representation	Applicant Response
		Concern regarding risk of temporary 'disconnects' becoming dead ends for extended periods. 4. <u>Surfacing of multi-user routes and 'cycle tracks'</u> Seeking commitment that any share-use route expected to accommodate equestrian traffic is constructed with an equestrian-safe surface. 5. <u>Lack of equestrian infrastructure funding in the draft section S106 agreement</u> Seeking S106 funding allocated to fund the upgrading of local connecting footpaths to bridleways.	proposals for new and extended bridleways were "very welcome". 2. <u>Equestrian safety:</u> Operational HGV traffic routes will be controlled by the HGV Routeing Strategy, which is Appendix 6 of the TA (Document 6.3A.02/AS-056, pages 518 to 531) which restrict development HGV traffic to use the Ardley Bypass to access M40 J10, from where access to the M40 and A43 is provided. Enforcement of the HGV routeing restrictions will be via physical measures at the Principal Access junction and automatic number plate recognition (ANPR) cameras. Development HGV traffic will not be permitted to access the local lanes, including Somerton Road and Ardley Road, with enforcement via the ANPR cameras. The Construction Traffic Management Plan (CTMP) which is Appendix 38 of the TA (Document 6.3A.02/AS-056, pages 84 to 114) sets out the measures and controls regarding HGV construction traffic which will also not be permitted to use the local lanes. The Applicant would highlight that the HGV Routeing Strategy deals with operational HGV traffic movements and is not concerned with construction HGV traffic movements, which is dealt with in the CTMP. With regards to protection measures for bridleway users during the works the Applicant's overall strategy is to provide the new perimeter bridleway routes (along the former Upper Heyford Airfield boundary and along the southern boundary of the Main Site) as early as possible as shown on the Footway, Cycleway, ROW Strategy Overview Phase 1 drawing included in the (Document 6.3A.01/AS-055, drawing ADC-1794-DR-043).

RR Reference	Name/Organisation	Summary of Representation	Applicant Response
			These new routes, which unlike the existing routes will be connected into the wider network, will be opened up once any adjacent substantive construction activity (e.g. building the perimeter screening bund along the former Upper Heyford Airfield boundary) is completed, therefore providing the new routes away from significant construction activities. Where localised activity is still required then the details for management will be set out in the P-CEMP as required by the CEMP (Document 6.2C/APP-189). 3. <u>Protection of connectivity:</u> The Applicant notes that the two bridleways within the Main Site (109/28, 109/29 and 109/30) are already disconnected from the wider network (for example the western end of 109/29 is a dead end having been severed from construction of the airfield, and the northern end of 109/30 requires the user to climb over the safety barrier for the railway). Due to the significant construction activity that is to take place across the Main Site there is no temporary diversion that can be provided which would be safer for horse riding and would be sufficiently screened and segregated from construction activity. However, as noted above, the Applicant is committed to providing the new perimeter routes (which will be connected into the wider network) as early as possible. 4. <u>Surfacing:</u> The routes identified as 'Cycle Track' in Schedule 5 Part 3 of the dDCO are for use by cyclist and pedestrians and not equestrians. The routes identified as 'Public bridleway' will be designed and constructed with an equestrian-safe surface. 5. <u>S106:</u>

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			As set out above the development will provide a comprehensive network of bridleways, with over 4.5km of additional bridleway, filling in gaps in the existing fragmented network. In addition, the Applicant has also agreed to provide the recently requested S106 contribution to OCC to be used to enhance and upgrade existing PROWs in relation to network connectivity and equestrian provision as identified by OCC in their relevant representation (RR-109), these being the bridleway through Ardley Wood quarry (109/20) and the footpath between the landfill and Bucknell (148/3).
AS-090	West Berkshire	This RR consists of the 'Adequacy of Consultation Representation Proforma'.	The Applicant notes that this is the West Berkshire Council response to the 'Adequacy of Consultation Representation Proforma', not a Relevant Representation. At this stage in the process the Applicant has no response regarding consultation.
AS-091	Ministry of Defence (MoD)	Refers to the technical safeguarding zones surrounding RAF Weston-on-the-Green, and requests to be consulted on, and given adequate notice of, any material amendments to the proposals. Requires a construction management plan to be submitted to the MOD prior to construction. Raises concerns in relation to bird strike, specifically relating to the proposed PVs on roofspace, the landfill and SuDS.	The Applicant has met with the MoD since submission of their RR, and discussed the points raised. Key issues in response to these issues are set out below. ES Chapter 2 (Description of Development and Alternatives) (Document 6.2/ APP-170) sets out the maximum building height for the OxSRFI scheme which have been developed having regard to safeguarding constraints. The proposed drainage attenuation features have been designed to be predominantly dry, only engaging and filling up after prolonged and severe rainfall events (up to and including the 100 year + climate change rainfall event). Detailed calculations will be undertaken to determine the drain down times for each attenuation feature such that any mitigation, if

RR Reference	Name/Organisation	Summary of Representation	Applicant Response
			required, can be confirmed at the detailed design stage through detail required by DCO requirements. The risk of bird strike will be reduced/managed through the submission of a Bird Hazard Management Plan (BHMP) which would include appropriate planting/landscaping details to discourage birds, where necessary, as well as measures relevant to PVs (to prevent nesting). The Applicant has discussed with MoD that an outline BHMP will be submitted by the Applicant in due course and a new DCO Requirement will be added to secure compliance with it. In dialogue with the MoD reference post-submission of the RR was also made to an expectation of a 'glint and glare' assessment relating to (in advance of) any PV installation. This is something the Applicant is willing to consider, and could be secured via amendments to the DCO (e.g. via an additional criterion to DCO Requirement 9).

Part 1B - APPLICANT RESPONSE TO LOCAL SPECIFIC ISSUES

Specific responses to less common or specific queries raised by representations are provided in the table below. Some of these also share similarity with issues and/or responses included in the Applicant's Part 2 narrative response (further below):

RR Reference	Identity	Representation (Summary)	Applicant Response
RR-006	Anders Barker	This resident of Upper Heyford raises concerns and objections relating to a number of issues. Key points are summarised below under the headings used in the RR: - Noise – rail freight activity, including 24-hour freight operations will generate continuous noise, in addition to daily construction noise, with constant impacts on those working from home. The ES does not convincingly demonstrate that noise levels at Upper Heyford will remain within acceptable limits. ES modelling assumptions appear optimistic (rely on best-case scenarios), and fail to account for cumulative noise from rail and road operations in addition to existing building noise from the development of Upper Heyford. Road traffic from increased HGVs is a concern. The NPS has not been complied with regarding noise minimisation. Proposed mitigation measures (i.e., noise barriers, bunds and landscaping) are insufficient for Upper Heyford due to elevation changes, distance from the site, and the scale of operations. - Light pollution – extensive lighting proposed, including from new highways, will degrade the rural dark-sky environment around Upper Heyford with additional sky-glow and visual intrusion. The ES does not adequately assess	Noise - The Applicant disagrees that the ES modelling is based on optimistic best-case scenarios: - the construction noise prediction assumptions are based on standard methods and experience of similar schemes, reasonable worst-case assumptions have been made with regard to the proximity of construction works to receptors (paragraph 5.2.44 of ES Chapter 5 Noise and Vibration (Document 6.5/AS-066), - construction predictions also do not include any potential screening effects of the earthworks and bunding around the perimeter of the Main Site (paragraph 5.2.45 of ES Chapter 5 Noise and Vibration (Document 6.5/AS-066), - the modelled operational road traffic noise scenarios do not reflect the impact of modal shift which is embedded mitigation for the scheme and is expected to reduce light vehicle traffic associated with the proposed development (paragraph 5.2.55 of ES Chapter 5 Noise and Vibration (Document 6.5/AS-066), - The modelling of operational noise from the main site considers the peak periods of the day and night to provide a robust assessment (paragraph 5.2.75 of ES Chapter 5 Noise and Vibration (Document 6.5/AS-066),

RR Reference	Identity	Representation (Summary)	Applicant Response
		light spill, glare, skyglow or impacts on residential receptors or wildlife. • Landscape destruction – the development would permanently alter the countryside, removing agricultural land, open views, rural character and habitats. The visual impacts of large warehouses, rail infrastructure, and lighting have been under-estimated in the ES. Proposed ecological mitigation is insufficient to compensate for losses. • HGV disturbance – increased HGV movements will affect local roads, air quality safety, noise and amenity. The modelling undertaken appears optimistic and does not reflect peak congestion or cumulative impacts with other developments. • Construction disruption – construction over multiple years will cause prolonged disruption to Upper Heyford residents, including noise, dust, congestion, and lighting. The CEMP lacks detail and does not demonstrate how impacts on Upper Hefford will be minimised. • Policy/Procedural concerns include alleged deficiencies within the Environmental Statement (ES) as set out under the topics above, plus reference to whether alternatives have been assessed and the scale of development justified. The RR raises concerns that the Applicant has not justified the location or demonstrated need, and has not provided adequate safeguards for the people who will bear the brunt of this development.	• The rail noise modelling assumes that there is no growth from the existing baseline situation, representing a worst case (paragraph 5.4.34 of ES Chapter 5 Noise and Vibration (Document 6.5/AS-066). The site could operate 24/7 but the terminal would operate within any restrictions on the Chiltern mainline that may be in place. The cumulative effects of the development in relation to other developments are considered in section 5.7 of ES Chapter 5 (Noise and Vibration) (Document 6.5/AS-066). Regarding the cumulative effects of road and rail traffic in Upper Heyford, the settlement is beyond the study area for rail noise as indicated in paragraph 5.2.10 and paragraph 5.2.65 of ES Chapter 5 (Noise and Vibration) (Document 6.5/AS-066). The impact of additional HGVs travelling on the highway network has been assessed as part of the operational road traffic noise assessment which can be found from paragraph 5.5.36 onwards of ES Chapter 5 (Noise and Vibration) (Document 6.5/AS-066). As explained in ES Chapter 5 (Noise and Vibration) (Document 6.5/AS-066), the 3D noise modelling and subsequent assessment has included the proposed topography of the OxSRFI development, the height of the various noise sources and development buildings, the relevant source to receptor distances as well as the topography of the surrounding area and height of the surrounding buildings. Therefore, the mitigation measures have been appropriately specified with due regard to elevation changes and distance.

RR Reference	Identity	Representation (Summary)	Applicant Response
			As stated in paragraph of 5.8.8 of ES Chapter 5 (Noise and Vibration) (Document 6.5/AS-066) the planning test set out in the NPS regarding noise has been complied with; significant adverse effects have been avoided where practicable, adverse effects have been mitigated and minimised, and improvements to health will be achieved with the Ardley Bypass and Middleton Stoney Relief Road. Lighting – ES Chapter 8 (Lighting) (Document 6.8/APP-176) has assessed the lighting impacts from the OxSRFI scheme on identified 'receptors' and this includes lighting from warehouses, the rail terminal and highways works, with the assessment including residential and ecology receptors within a 4km study area. The ES Chapter concludes in Section 8.8 that, based on the proposed lighting strategy (Document 8.1/APP-256) there will not be any significant residual effects. The ES Chapter acknowledges that there will be an increase in the lighting baseline and an increase in the visibility of lighting in the landscape as a result of OxSRFI, but that this will not alter the environmental zone of the area (E2) which will remain as assessed within the chapter. It should also be noted that draft DCO Requirement 16 requires the submission of lighting details as part of the detailed design of OxSRFI (see Document 3.1/APP-139). Countryside and Landscape – The key policy test for the OxSRFI is the NPS. Paragraphs 4.81 to 4.83 of the NPS sets out that as a result of the specific locational

RR Reference	Identity	Representation (Summary)	Applicant Response
			requirements, countryside locations may be required for SRFIs, and that some residual effects from nationally significant infrastructure development may be unavoidable. In terms of the loss of agricultural land, ES Chapter 14 (Soil Resources and Agricultural Land) (Document 6.14/AS-082) shows that a very small percentage (approximately 9%, 37.7ha) of the agricultural land is solely in the 'best and most versatile' quality. While this represents a significant adverse effect as defined by standard metrics, the ES Chapter confirms that as mitigation, the soils will be protected and retained on-site and will form part of the landscaping or habitat enhancement features proposed, meaning the good quality soils will be retained, albeit their use will change. The assessment of landscape and visual effects are set out within ES Chapter 7 (LVIA) (Document 6.7/APP-175) with ES Appendices 7.2 (Landscape Effects Table) (Document 6.7B/APP-247) and 7.3 (Visual Effects Table) (Document 6.7C/APP-248) explaining the effects at individual receptors. Section 7.8 of the ES Chapter sets out the summary and conclusions which acknowledges some residual significant landscape and visual effects but explains that these will largely be confined at a site wide scale and the visual effect of users of the diverted PROW across the Main Site, with overall residual terms considered to be relatively limited and contained. The impacts on ecology have been assessed within ES Chapter 6 (Ecology including Arboriculture) (Document 6.6/APP-174). Section 6.8 of the ES Chapter sets out

RR Reference	Identity	Representation (Summary)	Applicant Response
			the summary and conclusions of the assessment and highlights that through the mitigation measures proposed as part of the development, the OxSRFI scheme will deliver a Biodiversity Net Gain (BNG) in excess of 10%. HGV Distribution and Traffic The Applicant considers that the highways strategy for the OxSRFI scheme, which includes the delivery of improvements to M40 J9 and J10, as well as the Ardley Bypass and Middleton Stoney Relief Road, will direct vehicles accessing the Main Site to use the strategic highways network instead of local roads. Further details about HGV routeing, including measures such as ANPR cameras, are explained within Appendix 6 to the Transport Assessment, which is ES Appendix 3.1 (see Transport Assessment - part 2 of 11 - Appendices 2 – 9) (Document 6.3A.02/AS-056). In addition, Draft DCO Requirement 24 requires the HGV routeing strategy to be complied with at all times (see the Draft DCO (Document 3.1/APP-139)). ES Chapter 3 (Transport) (Document 6.3/APP-171) sets out the significant modelling and assessment work undertaken throughout the preparation of the OxSRFI application which includes an assessment of peak time, HGV routeing and impacts on local roads. The modelling work has been agreed with the Transport Working Group which has been ongoing since 2020 and includes both the local and national highways authorities.

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			In terms of safety, ES Chapter 3 (Transport) (Document 6.3/APP-171) confirms that the proposed Highway Works have been subject to an Interim Stage 1 Road Safety Audit (RSA) in accordance with DMRB GG 119. In addition, the ES Chapter explains that the OxSRFI scheme will deliver active travel and PRow network changes which will provide a much-improved network of high-quality pedestrian and cycle routes in the surrounding area, which will promote active travel and enable a shift to sustainable transport modes. Construction Phase The implementation of a range of relevant measures and controls embedded within the Construction Environmental Management Plan (CEMP, see ES Appendix 2.3 (Document 6.2C/APP-189) and the Construction Traffic Management Plan (CTMP) which is included as TA Appendix 38 (within Document 6.3A.10/AS-064) will minimise disruption during the construction phase of the development and prevent significant adverse environmental and transport effects. Each topic within the ES assesses construction impacts from the OxSRFI scheme with mitigation measures proposed where needed to minimise residual effects – as stated above, these measures are often included in the CEMP and CTMP. A summary of construction effects for each topic is included in ES Chapter 17 (Summary of Effects) (Document 6.17/APP-185). Policy and Procedure – The Applicant fundamentally disagrees that it has not provided complete documentation and that it has not sufficiently engaged with the local community. The Applicant undertook two

RR Reference	Identity	Representation (Summary)	Applicant Response
			significant stages of consultation as part of the preparation of the OxSRFI application which provided the opportunity for comments and engagement by local residents, local authorities and other stakeholders. The consultation process is explained in detail within the submitted Consultation Report (APP-147 / Document 5.1) – paragraph 1.4.2 in particular should be noted as it repeats a complimentary statement by the Mid Cherwell Neighbourhood Forum in respect of the Stage 2 consultation process. Paragraph 1.3.6 also summarises ways in which the OxSRFI has been amended or revised as a result of comments received during the consultation process. In terms of alternative locations assessed by the Applicant, please refer to ES Appendix 2.4 (Alternative Sites Assessment) (Document 6.2D/AS-054) which provides the appropriate assessment. A justification of the location, need for the SRFI, for the scale of the proposed scheme, and an assessment of how the OxSRFI development is in accordance with the NPS, is all set out in the submitted Planning Statement (Document 5.4/APP-161).
RR-016	Brian Henry Wojtczak	The resident of Heyford Park raises the following concerns: Impacts from operational noise on residential amenity and requests an independent noise assessment for Heyford Park and surrounding villages. Requests noise limits to be enforced with triggers.	The points raised are responded in turn below: Noise – the Application is supported by an assessment of construction and operational noise and vibration as part of the ES (see ES Chapter 5 (Noise and Vibration) (Document 6.5/AS-066)). Draft DCO Requirement 26 relates to operational noise and requires the submission of relevant details to the local planning authority for approval

RR Reference	Identity	Representation (Summary)	Applicant Response
		• Increase of HGVs onto local roads and requests an enforceable HGV route for surrounding villages. • Accessibility to Ardley, Fritwell and nearby villages as a result of the scheme, and requests modelling of impacts on local roads. • Accessibility to the wider transport network and impacts on journey time. • Construction impacts and requests several measures (working hour restrictions and traffic routes) to minimise impacts. • Requests that OxSRFI scheme is assessed for cumulative impacts alongside other schemes being proposed in the area. • Includes a request for a resident liaison group with representation from Heyford Park and surrounding villages.	prior to installation and use (see the Draft DCO (Document 3.1/APP-139)). • <i>HGV routeing</i> – the highways strategy for the OxSRFI scheme, which includes the delivery of improvements to M40 J9 and J10, as well as the Ardley Bypass and Middleton Stoney Relief Road, will direct vehicles accessing the Main Site to use the strategic highways network instead of local roads. Further details about HGV routeing, including measures such as ANPR cameras, are explained within Appendix 6 to the Transport Assessment - part 2 of 11 - (Document 6.3A.02/AS-056). In addition, Draft DCO Requirement 24 requires the HGV routeing strategy to be complied with at all times (see the Draft DCO (Document 3.1/APP-139)). • <i>Accessibility to local villages and the wider highways network</i> – a fuller explanation of the highways strategy is explained within the main body of the report of the Transport Assessment (TA) - part 1 of 11 (Document 6.3A.01/AS-055). The TA also details the new and enhanced bus services that would be provided by the Proposed Development that would provide improved connectivity between Heyford Park, Middleton Stoney, and Bicester, and new connectivity from Heyford Park to Banbury, along with the significant investment in walking and cycling (and bridleway) routes that will connect OxSRFI to Heyford Park, other local villages and Bicester, thereby also providing improved interconnectivity between Heyford Park and these locations.

RR Reference	Identity	Representation (Summary)	Applicant Response
			• <i>Construction impacts</i> – the preparation of the Construction Environmental Management Plan (CEMP) (Document 6.2C/APP-189) has informed the ES. The CEMP includes measures to mitigate impacts during the construction phase which includes operational hours, measures to minimise noise and dust, and the management of construction traffic. It should also be noted that each topic within the ES assesses construction impacts, and these are summarised in ES Chapter 17 (Summary of Effects) (Document 6.17/APP-185). In addition, Draft DCO Requirement 10 requires the submission of a P-CEMP for each phase, and Requirement 25 covers Construction Hours (see the Draft DCO (Document 3.1/APP-139)). • <i>Cumulative Effects</i> – the cumulative effects of the OxSRFI scheme in consideration of other schemes within the locality of the Main Site are included within each ES topic, with ES Chapter 16 (Cumulative Effects) (Document 6.16/APP-184) providing a summary of these assessments. • <i>Resident liaison group</i> – draft DCO Requirement 32 requires the establishment of a community liaison group prior to the commencement of the development which will provide the opportunity for representatives from relevant parish councils to be involved in the group (see the Draft DCO – Document 3.1/APP-139).
RR-020	Calum Miller MP	The RR sets out a number of queries and concerns, including regarding whether a compelling strategic case has been made for the Proposed Development in terms of location and proposed scale.	The Applicant has engaged prior to submission of the Application with Mr Miller, and has sought further engagement again more recently.

RR Reference	Identity	Representation (Summary)	Applicant Response
		The RR refers to other existing or proposed SRFIs (Northampton Gateway, Radlett, and Rail Central) and queries whether there is a 'gap' addressed by the OxSRFI scheme and suggests there may be some duplication of capacity. Questions are also posed regarding the suitability of the location in light of other significant development proposals nearby at Heyford Park (expansion of), Puy du Fou, and major warehousing at Baynard's Green (by Albion Land and Tritax), which would collectively place substantial pressure on local infrastructure. Cumulative issues must be considered in the decision-making process as part of considering regional and national priorities. Mr Miller's primary concern is set out as preventing the area being overwhelmed by multiple national projects which are not coordinated through the local plan. If development is to proceed it must be supported by essential infrastructure investment. The scale of the warehousing proposed is not considered to be justified, and its relationship to the rail terminal isn't clear, raising questions about whether much of the site might function as a conventional road-based logistics site (which would undermine objectives of Government policy). Junction 10 of the M40 experiences significant pressures and is a longstanding concern locally. The substantial investment proposed by OxSRFI is recognised, and must take account of cumulative impacts, not simply this scheme in isolation. DfT must consider the SRFI on its merits with securing private investment a second-order consideration against other issues.	The Application responds directly to the 'compelling need' for additional SRFIs identified by national policy (the NPS) which explicitly seeks to enable an expanded network of SRFIs across the regions. The Applicant's strategic case in support of the Proposed Development and the location is set out in the Planning Statement (Document 5.4/APP-161), and the Market Analysis Report (Document 7.1, APP-311), supported by the GB Railfreight Supporting Statement (Document 7.2B/APP-313). In addition to the need established by the NPS, there is a recognised need for strategic logistics in this part of the M40. The Applicant has concluded that the OxSRFI will help to expand the network of SRFIs, meeting the needs of a market area currently poorly served. The Applicant also notes the recent (8th September 2026) new Government rail freight target focused on at least a 40% increase in rail freight by 2040 which is clearly directly relevant to the OxSRFI proposals and the need for additional SRFIs generally (Great British Railways sets course for rail freight growth - GOV.UK). With regard to scale, the DAD – Main Site (Document 5.5A/APP-166) summarises the extensive iterative design process including details of the scheme evolution and range of environmental and other design principles which have informed the scheme. This includes reference to both landscape and infrastructure considerations which led to the site, and scale of development, being defined as it is. The OxSRFI proposals (at 603,870 sq.m/approx. 6.5m sq.ft plus mezzanine) are comparable with all other approved SRFIs, albeit smaller than some including DIRFT 3 and

RR Reference	Identity	Representation (Summary)	Applicant Response
		Once operational a local concern is disruption or closure of the M40 and ensuring HGV traffic stays off local roads causing a range of potential harms and risks. The lack of any investment in passenger rail services or infrastructure is noted. A new passenger Station at Ardley should be given consideration, and the presence of a new Station make large-scale development in this location more acceptable. A new station would mean workers would not have to rely on private or road-based travel. Any development should proceed on the assumption of significant efforts to reduce net energy consumption, increase biodiversity and minimise noise and light pollution. Detail of the site layout and noise and lighting design or mitigation must be approved locally. The scheme should maximise (100%) solar PV and share anticipated energy generated. Any BNG proposals must be secured to ensure delivery.	West Midlands Interchange (which are both around 8m sq.ft). The NPS refers to the strategic nature of SRFIs as <i>“large-scale commercial operations”</i> and defines uses and criteria which have to be met including an ability to handle the longest (775m) trains which can operate on the UK network, a freight terminal and HGV facilities, and warehousing. In meeting the NPS's ambition to shift the long-haul freight legs from road to rail it is necessary and logical to seek to provide for National Distribution Centres – which tend to be the largest of all distribution warehouse facilities – on SRFI sites, and the scale of the OxSRFI proposals will allow for a number of such facilities on this site. Looked at from a different perspective, it would seem perverse to prevent NDCs from being able to locate on nationally significant SRFI sites (by further reducing floorspace or building heights) - it is unclear how other sites might provide the same opportunities to achieve modal shift in supply chains. The role of the terminal and its relationship with the warehousing are set out in the Planning Statement (Document 5.4/APP-161), as well as Section 4 of the Rail Report (Document 7.2A/APP-312) which is specifically focused on the role of SRFIs. With regard to other existing or proposed SRFIs, the 'Rail Central' scheme (adjacent to Northampton Gateway close to M1 Junction 15) was abandoned by its promoters some time ago and is not currently being pursued. In any event, SRFIs located on the M1 corridor in the East Midlands are not duplicating in terms of market coverage or capacity. The Radlett Interchange scheme is near St Albans in Hertfordshire (some 50 miles from OxSRFI). The 'compelling need'

RR Reference	Identity	Representation (Summary)	Applicant Response
			identified by the NPS is explicitly to be met by expanding the network of SRFIs – as identified in the Market Analysis Report (referred to above), the M40 is currently underserved with no operational SRFIs despite its strategic function. The Applicant has set out the market rationale in the Market Analysis Report, and the evidence is clear there is a 'gap' which would be addressed by a new SRFI which would enable the mode shift sought by the NPS for logistics operations and supply chains on the M40 corridor and market area identified. It is welcomed that Mr Miller acknowledges the long-standing problems and concerns associated with M40 J10, and the substantial investment proposed by OxSRFI to mitigate the impacts of additional traffic. In doing so the Proposed Development will help address or improve many of those problems. Steered by the Transport Working Group (TWG) consisting of National Highways, OCC Highways and CDC with the Applicant, the submitted Transport Assessment and proposed infrastructure works has taken a comprehensive and robust approach to assessment of cumulative traffic from an extensive list of planned, committed and proposed development in addition to anticipated OxSRFI traffic. Therefore, while focused on mitigation, the infrastructure proposed by OxSRFI will also provide benefits in the context of wider growth and development already planned or consented. Other live but not yet determined proposals – including examples such as Puy du Fou and Heyford Park 'new town' - are in the process of considering their own likely additional effects and any need for further works or mitigation.

RR Reference	Identity	Representation (Summary)	Applicant Response
			The points made about M40 closures and diversion routes are noted, but are beyond the control of the Applicant. The B430 serves as the current official diversion route when the M40 is closed, and it will remain so. However, with the addition of the proposed Ardley Bypass and Middleton Stoney Relief Road, plus improvements at M40 Junction 9, it is considered that the network as a whole will be more resilient than it is currently. The Applicant is fully aware of the local ambitions and aspirations to see a new passenger rail Station close to Ardley. The Planning Statement Appendix 3 contains a Passenger Rail Station Note (Document 5.4C/AS-050) which helps set out the Applicant's position with regard to the emerging potential new Station. That Note explains how OxSRFI would not prejudice the delivery of a passenger Station and includes details of the ways in which OxSRFI would potentially help enable delivery or reduce future infrastructure works and costs for those bodies who would bring it forward in due course. Positive dialogue has been held with numerous bodies regarding the possible interactions between OxSRFI and delivery of a new future Station – it is hoped this will form part of emerging SoCGs with OCC and CDC. The Network Rail (NR) SoCG (Document 8.1/AS-092) confirms that NR's position is that OxSRFI would not prejudice a new Station if brought forward on the site of the former Station south of Ardley.

RR Reference	Identity	Representation (Summary)	Applicant Response
			The submitted ES (Document series 6), and DAD (Document 5.5A), provide details of the range of measures proposed regarding reducing energy consumption, increasing biodiversity, and minimising noise and light pollution. The Application includes an Energy Strategy which includes a commitment to delivery of on-site solar PV energy generation, albeit the ultimate total quantum will be informed both by occupier requirements and the ability of the grid to accept feed-in energy (which is currently very limited). However, buildings will be designed and constructed to be able to accommodate 100% coverage of PV on available roof space. Despite not being mandatory for the OxSRFI project, the Application will deliver in excess of 10% BNG on-site, secured by a submitted HMMP (Document 6.6K) and proposed DCO Requirements.
RR-039	Emma McCulloch	The RR supports the principle of the Ardley Bypass and removing through-traffic from Ardley village which should deliver benefits for highway safety, residential amenity and the village environment. However the Rep also raises concerns that the OxSRFI proposals do not yet demonstrate that the bypass would be delivered in the safest and most effective form. The concerns about access arrangements for Ardley village are: The OxSRFI scheme should remove or restrict the northern connection for Ardley village instead of the southern connection, which will help Ardley be a local destination.	The Applicant recognises that there are a wide range of movements catered for at M40 J10 and hence why the Applicant is proposing a significant enhancement to that junction, notably by providing a second northbound exit slip road to enable traffic from the M40 to reach the A43 without having to go through the Ardley and Cherwell junctions. In doing so, the Ardley exit will become a local access for Ardley and the surrounding villages, OxSRFI, and the motorway service area. In this context, it remains appropriate for Ardley to be served from the existing road connection rather than constructing a new access and link to the south of the village. Under the proposals the Ardley Bypass will become the B430 and clear signage will be provided at

RR Reference	Identity	Representation (Summary)	Applicant Response
		• Need to use M40 J10 for a wide range of movements. • Bus access should be addressed and the OxSRFI scheme should not make it harder for the village to be served by buses. • A clear access vision for Ardley village should be provided. • The proposed single-carriageway approach should be demonstrated to be safe and legible, and whether they were considered through a Road Safety Audit. • Questions whether the M40 J10 works will require significant road closures, lane closures, diversions or temporary traffic management affecting Ardley village. • The M40 J10 layout should be tested for driver legibility.	Ardley Roundabout directing all B430 traffic onto the bypass, with access to Ardley village signed as a local destination as shown on the directional signage strategy (TA Appendix 40, Document 6.3A.10/APP-064, page 110). Whilst the Proposed Development does not propose a bus service that connects directly with Ardley village, new bus stops will be provided at the Principal Site access, and as set out in the Framework Travel Plan (Document 6.3B/APP-203) a mobility hub will be provided within the northern section of the Main Site that will include secured covered cycle parking, thereby providing opportunities for residents to access the OxSRFI bus services as part of a multi modal journey. Access to Ardley Road, which forms part of the route of bus service 81 (the Bicester Bee) (see Figure 6 of the Public Transport Strategy, TA Appendix 5, Document 6.3A.02 page 492/AS-056) the existing fixed route service that serves Ardley, is maintained under the proposals and hence this existing service will be unaffected. The (interim) Stage 1 RSA did not raise any concerns with the principle of a single 2+1 carriageway for the Ardley Bypass, which has been designed in accordance with the relevant standards for this type of road, including design speed, geometry and forward visibility. There are no departures from standard required for the bypass itself (TA Appendix 32 (Document 6.3A.09/APP-063, pages 783 to 814)) and the use of a single 2+1 carriageway prohibits overtaking.

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			All of the Highway Works are currently going through the independent Stage 1 RSA process, and driver legibility is an important consideration of that process, as it has been throughout the design development process undertaken and agreed in consultation with National Highways and OCC. It is the Applicant's view that the layout changes proposed at M40 J10 in combination with the proposed signage strategy will improve driver legibility at the junction. The Applicant will construct the highway works without implementing any significant long-term closures of the B430 through Ardley (and notes that the B430 forms the construction access route to the OxSRFI Main Site), but there will be a need for localised short term (e.g. overnight) closures to undertake specific works within J10 such as surfacing.
RR-046	Gareth Epps	RR comments are submitted solely in the respondent's capacity as local county councillor. Principal concerns (under nine headings) are: <i>The potential to prejudice reopening of a passenger station at Ardley</i> – a new Station forms part of the OCC OxRail 2040 strategy. The OxSRFI plans do not address provision needed, such as car parking, for a station to reopen on its former footprint. <i>The role of the Chiltern Mainline in the strategic freight network is unclear</i> – Document 7.2 (figure 4) appears to list it as a diversionary route only. There is no clear indication of the criteria for	The Applicant's responses are set out against these 9 headings below: <i>Potential Passenger Station</i> – the Applicant is engaged in constructive dialogue with OCC and CDC regarding their exploration of the feasibility of a new Station, including ongoing work on a potential SoCG on rail issues. The Planning Statement Appendix 3 contains a Passenger Rail Station Note (Document 5.4C/AS-050) which sets out the Applicant's position with regard to the potential new Station. OxSRFI would not prejudice the delivery of a passenger Station, and the Note includes details of the ways in which OxSRFI would potentially help enable delivery or reduce future

RR Reference	Identity	Representation (Summary)	Applicant Response
		core trunk or diversionary routes. The DCO submission should commit to remedying the loading gauge constraints in the tunnel immediately North of the proposed site to achieve W8 (ideally W10). 3. <i>No proposed rail capacity improvements</i> – confirmation should be sought (with Chiltern Railways) that there is capacity to support freight and enhanced passenger services with potential for future growth. 4. <i>HGV mileage saving [Chapter 3 Appendix 3.33] is based on 12 trains per day which is highly optimistic</i> – the Non-Technical Summary (section 1.6.128) shows that the carbon impact of the project is negative in spite of the purported modal shift. This suggests that the applicants need to do more. 5. <i>Important that enhancements to bus services aid connectivity to and from neighbouring villages as well as Banbury, Brackley and Bicester</i> – There are opportunities to develop better local transport that would be used by workers; the proposed Banbury-OxSRFI service is a good example, though a connection with Steeple Aston village would make it better still. Moderate enhancements to existing services could make it attractive to potential workers and Bicester visitors. 6. <i>Proposals for new environmental weight limits and ANPR enforcement welcome but detail needs clarity</i> – it is not considered acceptable (section 3.4 'HGV Routeing Strategy' section 6) for the proposed ANPR equipment to be run merely by	infrastructure works and costs for those bodies who would bring it forward in due course. However, the proposed Station sits outside of OxSRFI site, and is not required by – nor to be delivered by – OxSRFI. 2. <i>Chiltern Line and freight gauge</i> – the Mainline has regularly been used by freight traffic, and does form part of the national Rail Freight Network. The Rail Report (Document 7.2A/APP-312) and GB Rail Freight Supporting Statement (Document 7.2B/APP-313) confirm that the Chiltern Mainline is capable of enhancement to W8 gauge and explain the suitability of the Chiltern Main Line to accommodate rail freight. The GB Railfreight Supporting Statement Doc 7.2B explains why GBRf consider W8 gauge suitable and appropriate for their commercial operations and why the OxSRFI location on the Chiltern Main line is commercially attractive to them. The submitted detail is clear regarding works proposed to Ardley tunnel which would secure W8 connectivity, as required by the NPS. The recent email received by the Applicant from Network Rail (at Appendix D) is also referring directly to a number of issues raised by this RR. 3. <i>Rail network capacity</i> – the Applicant has worked extensively and constructively in dialogue with Network Rail over a long period, and the SoCG with them (AS-092) addresses the key points raised in terms of overall capacity on the network for passenger and freight growth. Similarly, the emerging SoCG with Chiltern Railways is expected to include a clear position regarding interactions with current and future

RR Reference	Identity	Representation (Summary)	Applicant Response
		way of a unilateral undertaking. Operation by OCC would be welcome. As proposed it could not robustly and fairly enforce the restrictions more broadly. HGVs illegally using rural roads causes harm in Fritwell, Somerton and Clifton. No known environmental weight restriction zone is proposed in Fritwell (contrary to the implication in the HGV Routeing Strategy). The B4031 through Clifton and Deddington should be added to the zone for ANPR enforcement. 7. <i>M40 Junction 10 works are an opportunity to deliver better landscaping (plus general noise and lighting comments) – when the M40 was built promised landscaping and planting (for noise mitigation and ecological gain) was not delivered. The reconfiguration of Junction 10 should positively address this with significant tree planting on the approaches and on the motorway boundary. Noise mitigation should be a key output of the strategy for landscaping and earthworks for sensitive receptors at the eastern extent of Heyford Park where monitoring should be undertaken during construction and operation. Heyford Park residents are concerned about noise and light pollution. A lighting strategy will need to address concerns regarding local amenity, and regarding landscape and visual effects which need to be minimised.</i> 8. <i>The promoter should report regularly to Liaison panel based around Junction 10 – this should be formed of all local parish councils and run jointly by OCC and CDC.</i>	passenger services. Also see the response to the Chiltern Railways RR above (RR-025). The Statement of Common Ground with Network Rail includes, as an Appendix, an explanation as to how the freight pathing process works. This explains how freight paths are allocated alongside passenger service paths and how Network Rail works to accommodate both passenger and freight growth. (Also see Appendix D) 4. <i>Mode shift and carbon reductions</i> – the criticisms made under this heading appear to conflate several things. The long-term daily freight trains assumption is part of the assessment of carbon emissions, but only a part. While the NPS confirms rail freight reduces emissions on average by 76% per tonne per km travelled when compared to road freight, the shift to rail freight also has other, wider relevance in terms of the environmental impact of the SRFI. The SRFI could remove over 53 million HGV miles per year (and the NPS refers to each freight train having the potential to remove up to 76 HGVs from the road network), with associated reductions in carbon and other emissions (relevant to air quality) but also reductions in congestion on the road network. The overall assessment of OxSRFI's carbon (Greenhouse Gas) effects takes into account the construction and operation of the site as a whole, including emissions sources associated with the construction and operation of the warehouse buildings, alongside potential savings from the SRFI, as required for an EIA. When considering all emissions sources, this results in total additional emission resulting from the Proposed Development. Emissions reduction

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		9. <i>Cumulative impacts need to be considered</i> – other speculative (outside of local plan) proposals including Heyford Park 9000 home 'new town', distribution warehousing proposals under appeal at M40 J10 (Baynard's Green), and Puy du Fou leisure park and other significant applications. There are inadequate legal structures dealing with this, so the DCO process must.	measures have been committed to by the Applicant to reduce overall carbon emissions, including energy efficient and 'fabric first' design, on-site renewable energy generation, and measures to reduce construction emissions. These measures are set out in the Energy Strategy (Document 6.15D/APP-304) and Carbon Management Plan (Document 6.15E/AS-083). Such emissions reduction measures, alongside the role of the SRFI to reduce HGV movements and enable lower carbon rail freight movements, ensure the Proposed Development as whole aligns with national decarbonisation targets and policy. 5. <i>Bus service enhancements</i> - The Transport Assessment details the new and enhanced bus services that would be provided and would improve connectivity between Heyford Park, Middleton Stoney, and Bicester, and provide new connectivity from Heyford Park to Banbury. The Framework Travel Plan (Document 6.3B/APP-203) has been agreed with OCC. It includes agreed modal shift targets that reflect the significant package of connectivity improvements that will be provided by the Proposed Development, as described in the Sustainable Transport Strategy (TA Appendix 1, Document 6.3A.01/AS-055) and Public Transport Strategy (TA Appendix 5, within Document 6.3A.02/AS-056). 6. <i>HGV Routeing and weight restrictions</i> – the harm and local concern caused by inappropriate use of rural or village roads by HGVs is well understood by the Applicant. The proposed design and scope of, and the approach management and operation of, the HGV

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			Routeing Strategy has been discussed in some detail with OCC Highways and National Highways. The focus of new weight restrictions and ANPR enforcement is informed by the traffic modelling of where development traffic may travel to and from. The proposed Strategy would ensure all HGV traffic associated with OxSRFI arrives and departs by appropriate routes to and from M40 Junction 10. Provision of this ANPR enforcement already ensures that OxSRFI HGV traffic will not travel via the local route network, including the B4031 Clifton Road. Hence there is no requirement for additional ANPR cameras directly on the B4031 Clifton Road. Draft DCO Requirement 24 requires the HGV routeing strategy to be complied with at all times (see the Draft DCO (Document 3.1/APP-139). 7. <i>M40 Junction 10 landscaping (and wider issues re: noise and lighting)</i> the proposals assume appropriate, high-quality landscaping as part of all road infrastructure works, albeit the detail is subject to the requirements or standards of the relevant highways authority where the new roads will ultimately be part of the public highway in due course. The ES includes a Noise Assessment as part of ES Chapter 5 (Document 6.5/AS-066) which has informed appropriate mitigation through scheme parameters and design, including earthworks, to minimise likely noise effects. Similarly, the Lighting assessment (ES Chapter 8) includes a lighting strategy (Document 6.8A/APP-256) which will minimise or avoid off-site effects on nearby residential properties.

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			8. <i>Community liaison</i> – the respondents support for community liaison is noted and welcomed. The Applicant's intention to undertake regular community liaison during construction and operational phases is clearly set out at DCO Requirement 32 which secures a Community Liaison Group (CLG) to be administered by the undertaker. The group as defined in the DCO would include relevant parish councils, highways authorities, and other stakeholders, as proposed in this RR, but would be chaired by the Applicant (undertaker). 9. <i>Cumulative impacts</i> - the cumulative effects of the OxSRFI scheme in consideration of other schemes within the locality are included within each ES topic, with ES Chapter 16 (Cumulative Effects) (Document 6.16/APP-184) providing a summary of these assessments. Specifically with regard to traffic, the TA has considered an extensive list of planned and committed growth (local plan and planning consents), as agreed with CDC, OCC and National Highways via the Transport Working Group. This ensures highways impacts and mitigation include consideration of wider future traffic, not only OxSRFI related traffic.
RR-077	Keith Stacey	The RR first raises two principal concerns: 1. Whether the Proposed Development genuinely satisfies the NPS policy tests for a Strategic Rail Freight Interchange. 2. The direct and severe impact of a 24-hour, 7-day operation on the amenity of Ardley and the surrounding villages, in an area which already experiences significant noise disturbance from the M40.	The Applicant's response to the various points is provided below: • NPS tests – the OxSRFI proposals clearly meet the tests or criteria for an SRFI. An assessment of the OxSRFI scheme against the relevance tests in the NPS is contained in the Planning Statement (Document 5.4/APP-161) and Planning Statement Appendix 2 NPS Policy Compliance Tracker (Document 5.4B/APP-163).

RR Reference	Identity	Representation (Summary)	Applicant Response
		The resident also raises the following points: • Draft DCO Requirement 5 – the resident requests this requirement includes reference to a connection to the Chiltern Main Line and that no floorspace may be occupied. Also requests evidence that four trains a day can be achieved as required by the NPS. • Noise – queries some of the noise levels used in the assessment and raises concerns with incomplete assessments and unknown impacts on properties in the vicinity of the Main Site. Some existing receptors are included in the 'Important Areas' under the Environmental Noise (England) Regulations 2006) in the draft version of the ES Chapter as well as experiencing noise levels above the SOAEL for road traffic noise and that this should be accounted for. Requests a baseline noise survey over a range of seasonal and meteorological conditions. States the assessment has not considered the impacts on Heyford Park • Light pollution – raises concerns about the impacts of night-time operations on the character of the area, amenity of nearby residents and nocturnal wildlife. • M40 capacity – raises concerns about current congestion at M40 Junctions 9 and 10 and the impact of the approach to the phasing of highways works for the OxSRFI scheme. Also raises concerns about the approach to the assessment of gantry cranes within the ES.	• Impacts on Ardley – an assessment of residual environmental effects on receptors (including Ardley) has been undertaken as relevant within each ES topic with measures proposed as required to mitigate and minimise effects. A summary of these effects is found within in ES Chapter 17 (Summary of Effects) (Document 6.17/APP-185). • Draft DCO Requirement 5 – The Applicant's position and approach on the rail requirement including the trigger and floorspace occupation is clear. The proposed approach follows the same approach as approved SRFIs at Northampton, and West Midlands Interchange, and – crucially - follows the NPS which accepts that buildings may need to be occupied in advance of the terminal being available for use. Also see responses to representations from OCC (RR-024) and England's Economic Heartland (RR-041). • Noise – the RR points concerning incomplete assessments refer to the draft ES Chapter 5 (Noise and Vibration) which was provided for the Stage 2 consultation in Autumn 2025. At that stage, modelling and transport assessment work was still being completed and therefore further information was required to complete the noise assessment. As a result, draft ES Chapter 5 represented the information available at that time. ES Chapter 5 was updated and completed with the required inputs relating to road traffic noise prior to submission and is now available as ES Chapter 5 (Noise and Vibration) (Document 6.5/AS-066). The traffic data used in the assessment is explained in paragraphs 5.2.52 to 5.2.58 of ES Chapter 5 and the

RR Reference	Identity	Representation (Summary)	Applicant Response
		- Proximity to residential development – requests further evidence is provided to the OxSRFI would not adversely affect adjacent existing and proposed residential development. - Cumulative impacts – raises concerns about the cumulative impacts from proposed developments at M40 Junctions 9 and 10, Bicester, Heyford Park and Puy du Fou. - Ardley Bypass and landscape and visual harm – requests further detail in relation to the proposed landscape bund and screening for the Ardley Bypass. - Ecology, heritage and agricultural land – highlights the loss of agricultural land, and impacts on designated ecological and geological assets in the vicinity of the Main Site as significant.	assessment of operational road traffic noise can be found from paragraph 5.5.36 onwards. The assessment of future road traffic noise also includes an assessment of noise from the proposed Ardley Bypass. Noise Important Areas indicate where existing sound levels from road and rail sources is already high. The baseline survey noise measurements also indicate that some areas already experience high levels of road traffic noise, and these are above the SOAEL identified in Table 5.15 of ES Chapter 5 (Document 6.5/AS-066). As indicated at paragraph 5.2.59, the significance of traffic noise effects is based on a combination of the resultant noise exposure at the receptor and the change between the 'Do Minimum' and 'Do Something' scenarios. So, where sound levels at residential properties are above the SOAEL for road traffic noise, the assessment accounts for these high sound levels by reducing the negligible threshold to 'up to 0.9 dB'. Above this magnitude of change a significant effect is experienced; this is explained in paragraphs 5.2.61 and 5.2.62 of ES Chapter 5 (Noise and Vibration) (Document 6.5/AS-066). ES Appendix 5.5 Noise Summary Results (Document 6.5E/APP-225) provides the weather data for the duration of the noise survey in graphical format. These show significant variation in meteorological conditions, especially wind speed and direction over the 21-day period during which measurements were undertaken. They also show different measurement parameters including the L_{Aeq}, L_{Amax} and L_{A90}. The baseline survey is robust

RR Reference	Identity	Representation (Summary)	Applicant Response
			and representative. The impacts at the proposed Heyford Park development have been considered in ES Chapter 5 (Noise and Vibration) with the development being represented by the receptors R30 and R30A. • <u>Light pollution</u> – an assessment of light pollution has been undertaken within ES Chapter 8 (Lighting) (Document 6.8/APP-176) which assesses relevant nearby receptors to the OxSRFI scheme (including properties in Ardley and Middleton Stoney villages). With mitigation included within the OxSRFI, ES Chapter 8 confirms there will be no significant effect of lighting during both the construction and operational phases of development. • <u>M40 capacity</u> – the OxSRFI will deliver significant highways improvements which includes improvements to both J9 and J10. These improvements will increase capacity at these junctions and direct the movement of traffic for the OxSRFI scheme to the strategic highways network instead of local roads. • <u>Proximity to residential development</u> – the ES undertakes an assessment of residual environmental effects on nearby receptors (including Ardley, Heyford Park and Middleton Stoney) within each ES topic with measures proposed as required to mitigate and minimise effects and able the OxSRFI to accord with NPS paragraph 4.83. A summary of these effects is found within in ES Chapter 17 (Summary of Effects) (Document 6.17/APP-185). • <u>Cumulative impacts</u> – the cumulative effects of the OxSRFI scheme in consideration of other schemes

RR Reference	Identity	Representation (Summary)	Applicant Response
			within the locality of the Main Site are included within each ES topic, with ES Chapter 16 (Cumulative Effects) (Document 6.16/APP-184) providing a summary of these assessments. • <u><i>Ardley Bypass and landscape and visual harm</i></u> – further details within the DCO submission are provided to demonstrate the proposed extent of landscaping for the Ardley Bypass. ES Appendix 7.7 (Illustrative Landscape Cross Sections) (Document 6.7G/APP-252) shows landscaping to the west of the bypass being approx. 30-35m wide with heights (when including the bund and planting) being above HGV heights. Landscaping to the east of the bypass is also shown as being approx. 30-35m wide. • <u><i>Ecology, heritage and agricultural land</i></u> – in terms of the loss of agricultural land, ES Chapter 14 (Soil Resources and Agricultural Land) (Document 6.14/AS-082) shows that a very small percentage (approximately 9%, 37.7ha) of the agricultural land is solely in the 'best and most versatile' quality. While this represents a significant adverse effect as defined by standard metrics, the ES Chapter confirms that as mitigation, the soils will be protected and retained on-site and will form part of the landscaping or habitat enhancement features proposed, meaning the good quality soils will be retained, albeit their use will change. An Assessment of the impacts of OxSRFI on the biodiversity designation of Ardley Cutting and Quarry SSSI are explained within ES Chapter 6 (Ecology including Arboriculture) (Document 6.6/APP-174), and the ES Chapter states that with mitigation in place, no significant impacts are

RR Reference	Identity	Representation (Summary)	Applicant Response
			anticipated. An Assessment of the impacts of OxSRFI on the geological designation of Ardley Cutting and Quarry SSSI are explained within ES Appendix 11.10 (Jurassic Rock Exposure Technical Note) (Document 6.11J/AS-081), which states that overall the development will have a net benefit in the extent of rock exposures present. With reference to palaeontology and Ardley Trackways, the Ardley Trackways Technical Note (Document 6.11I/AS-080) sets out that a watching brief will be undertaken where deeper excavations are undertaken into the lower portion of the White Limestone Formation. Should potential footprints, or similar geology/fossils or high interest be identified, the palaeontologist would examine the features to determine the species, age, significance and condition to help inform decisions about an appropriate approach to mitigation.
RR-086	Luke Haddon	The RR explicitly offers broad support for the OxSRFI proposals. Explicitly, the respondent supports the principle of infrastructure projects that seek to shift freight from road to rail, reduce heavy goods vehicle movements through local communities, and improve the long-term resilience of transport infrastructure in Oxfordshire. The RR identifies that the project has the potential to improve transport connectivity and logistics efficiency for the wider region. In the context of overall support, the resident also makes the following comments:	The Applicant welcomes the support for the principle of SRFIs and the specific support for OxSRFI. The Applicant agrees with the comments which recognise the potential for the OxSRFI scheme to improve transport connectivity and logistics efficiency for the wider region. In response to the other comments made, each point is taken in turn below: • <u>Direct access for the former RAF Upper Heyford base</u> – access for commercial vehicles at the former RAF base will be along the new Heyford Park Link Road and B430 to the OxSRFI Principal Access.

RR Reference	Identity	Representation (Summary)	Applicant Response
		• Direct access should be provided from the OxSRFI site to warehouse and commercial facilities at the former RAF Upper Heyford base, without routing through Upper Heyford village. • Environmental and wildlife impacts should be minimised through careful planning, mitigation, habitat management, and landscaping. • Requests attention to the following issues: ○ Traffic management; ○ HGV traffic through Upper Heyford village and along Camp Road; ○ Noise, air quality, and environmental mitigation; ○ Appropriate landscaping and visual screening; ○ Protection and enhancement of local habitats where possible; ○ Investment in local road infrastructure and community facilities to support the area's continued growth.	• <u><i>Environmental and wildlife impacts</i></u> – these have been assessed within different topics as part of the submitted Environmental Statement (ES). A summary of these effects is found in ES Chapter 17 (Summary of Effects) (Document 6.17/APP-185). It should also be noted that different environmental and management plans are secured through requirements in the draft DCO (Document 3.1/APP-139) - this includes Requirements 11 (Provision of landscaping) and Requirement 12 (Habitat management and monitoring plan and biodiversity net gain). Some of the additional points raised are covered in the response above, but additional comments on each are as follows: • Traffic management and investment in local road infrastructure – an explanation of traffic management and the mitigation (i.e., investment) proposed for both the strategic and local road networks is explained within the main body of the report of ES Appendix 3.1 (Transport Assessment - part 1 of 11 – Report and Appendix 1) (Document 6.3A.01/AS-055). • Noise and air quality – an assessment of these two topics has been undertaken in the ES: ES Chapter 5 (Noise and Vibration) (Document 6.5/AS-066) and ES Chapter 4 (Air Quality and Odour) (Document 6.4/APP-172). • Landscape and visual screening – the development of strategic landscaping was integral to the preparation of the design and layout of the OxSRFI scheme, and this is explained within the

RR Reference	Identity	Representation (Summary)	Applicant Response
			Design Approach Document - Main Site (Document 5.5A/ APP-166). An assessment of the landscape and visual effects from the scheme are presented in ES Chapter 7 Landscape and Visual Impact Assessment (Document 6.7/ APP-175).
RR-093	Matt Bazeley	The resident who lives on the southern end of Ardley, makes the following comments: • Concerned about increase in traffic along the B430 from the OxSRFI scheme. Requests the Ardley Bypass is completed first with all construction traffic using that route. • Requests significant sound protection, damping, or bunding is put up along the north side of the site (north side of the railway line) to mitigate the noise of the rail movements and loading/unloading. A survey of existing conditions should also be taken. • All lighting should face south to minimise impact on Ardley village. • The site should have limited operating hours with no movements between 22.00-06.00hrs to reduce the impact on the local environment. • The Ardley quarry/medieval site must be protected during construction and operation. • All buildings should be constructed with maximum solar power capacity to reduce the environmental energy demands of the site. • The B340 should be closed off at the Ardley railway bridge at the earliest opportunity and traffic redirected onto the Ardley Bypass.	• <u>Traffic along the B430 and implementation of the Ardley Bypass</u> – the Applicant will deliver significant highways improvements. This includes the Ardley Bypass which will reduce through traffic in Ardley, and thereby reduce existing associated noise and air pollution in the village. The Ardley Bypass will be delivered in the first phase of highways works and will be open before the first unit is operational. An assessment of construction traffic ES Chapter 3 Transport (Document 6.3/APP-171) which confirms within Table 3.24 and paragraph 3.5.27 that construction traffic on the B430, prior to the delivery of Ardley Bypass, will not result in a significant adverse effect in EIA terms. • <u>Sound protection</u> – paragraph 5.6.10 of ES Chapter 5 (Noise and Vibration) (Document 6.5/AS-066) explains that a 3m high acoustic barrier will be included on top of the 17m high bunding north of the rail terminal (with detail to be confirmed through DCO Requirement 9) to mitigate noise levels for Ardley residents. As a result of the bund and acoustic fencing, no significant adverse noise effects on the village are likely from OxSRFI. • <u>Lighting</u> – a lighting strategy for the development of the OxSRFI scheme is explained within ES Appendix 8.1 (Outline Lighting Strategy)

RR Reference	Identity	Representation (Summary)	Applicant Response
			(Document 6.8A/APP-256), and this includes embedded measures to minimise lighting impacts on Ardley. ES Chapter 8 (Lighting) (Document 6.8/APP-176) confirms that as a result of the proposed lighting strategy there not be a significant adverse on Ardley village from the development. • <u>Hours of operation</u> – DCO Requirement 25 defines Construction Hours (see the Draft DCO (Document 3.1/APP-139)). The terminal will operate 24/7 but in line with any restrictions on the Chiltern mainline that may be in place. • <u>Ardley quarry</u> – ES Appendix 11.9 (Ardley Trackways Technical Note Rev) (Document 6.11/AS-080) sets out that a watching brief will be undertaken where deeper excavations are undertaken into the lower portion of the White Limestone Formation. Should potential footprints, or fossils be identified, a palaeontologist would examine the features to determine the species, age, significance and condition to help inform decisions about an appropriate approach to mitigation. The support for this approach from Natural England is welcomed by the Applicant. • <u>Use of solar energy on buildings</u> – ES Chapter 15 Climate Change (Document 6.15/APP-183) explains (paragraph 15.5.56) that the Applicant is committed to engaging with future tenants to reduce their operational energy emissions and as such, the warehouses have been designed to be capable of structurally providing 100% of available roof PV coverage.

RR Reference	Identity	Representation (Summary)	Applicant Response
RR-114	Philp Norstrand	The RR raises a number of points structured under several headings: • <i>The SRFI proposals are a 'trojan horse' for warehouses alone</i> – the RR queries the volumes of freight which will be moved by rail compared with road, and queries the amount of proposed warehouse capacity at the site. Suggests fixed targets for rail volumes should be included. • <i>Chiltern Line capacity</i> - considers that the Chiltern Main Line is unsuitable for 'high box' containers which are increasingly used globally, and that significant engineering works will be required to allow even standard containers. • Highlights concerns about the potential for the site to be contaminated with <i>PFAS</i>, with reference to data from other locations close to the former RAF Airbase. • <i>Lack of electric freight</i> - considers that the proposal is 100% focused on diesel propulsion, with freight trains powered by diesel and with no provision for fast-charging electric lorries. • Considers OxSRFI would block the development of a high-grade <i>Ardley passenger station</i> (including a park and ride). Also considers that the OxSRFI scheme should fund the Ardley passenger station to aid traffic associated with Puy du Fou and to remove cars from the M40, A43 and A34. • <i>Concerned about loss of greenspace</i> onsite and the site as a current 'recreational area'. Does not consider proposed BNG is realistic.	• <i>'Trojan Horse' for warehousing alone</i> – similar concerns are often raised where SRFI are proposed, but are unfounded. An SRFI is defined by Government as including a terminal and warehousing – both are required. Without additional terminals, the mode shift to rail will not be deliverable, but there is clear evidence that where terminal capacity is provided, the distribution and logistics market increases use of rail freight. Paragraphs 6.13 and 6.14 of the Market Analysis Report (Document 7.1/APP-311) provide a narrative regarding the experience of other SRFIs which have, through their introduction, unlocked market interest in rail freight, including reference to East Midlands Gateway (EMG) 1 where the terminal quickly exceeded its phase 1 design capacity and was expanded to full capacity earlier than expected due to strong market demand. The Market Analysis Report also includes details of the market context for rail freight including the drivers of rail freight growth (Section 5), the commercial need for an expanded network of SRFIs (Section 6), and Section 8 explains the deficiency in current SRFI provision and why OxSRFI will generate demand for rail freight which cannot currently be met. Similarly, the Rail Report (Document 7.2A/APP-312) explains the growth potential for rail freight (Section 3), and Section 4 refers to the success of other SRFIs in generating businesses new to rail through the provision of new terminal capacity which expanded the network. It also explains the significant number of SRFIs that would be required

RR Reference	Identity	Representation (Summary)	Applicant Response
		Concerned about impacts on <i>potential dinosaur tracks</i> in limestone layers onsite, as found at nearby Dewars Farm Quarry.	to help meet the Government's 75% target in rail freight growth. The Applicant also notes the recent (8th September 2026) new Government rail freight target focused on at least a 40% increase in rail freight by 2040 which is clearly directly relevant to the OxSRFI proposals and the need for additional SRFIs generally (Great British Railways sets course for rail freight growth - GOV.UK). The GB Railfreight Supporting Statement (Document 7.2B/APP-313) explains why they see OxSRFI as well placed to meet demands for rail freight and refers to the success seen at iPort Doncaster and EMG to quickly generate substantial new rail freight business. In addition, and of direct relevance to these concerns, the DCO is proposed with a clear limit on the amount of warehousing which can be delivered and occupied before the rail terminal is available for use. <u>Chiltern Main Line</u> – the Rail Report (Document 7.2A/APP-312) and GB Rail Freight Supporting Statement (Document 7.2B/APP-313) confirm that the Chiltern Mainline is capable of enhancement to W8 gauge and explain the suitability of the Chiltern Main Line to accommodate rail freight. The GB Railfreight Supporting Statement explains why GBRf consider W8 gauge suitable and appropriate for their commercial operations and why the OxSRFI location on the Chiltern Main line is commercially attractive. The Appendix to the Statement includes a specific section which explains why a W8 gauge railway will not reduce the commercial attractiveness of OxSRFI. The

RR Reference	Identity	Representation (Summary)	Applicant Response
			NNNPS confirms that W8 is an appropriate gauge clearance for strategic rail freight interchanges and a Statement of Common Ground (Document 8.1/AS-092) between the Applicant and Network Rail has been provided which confirms the suitability of the OxSRFI scheme on the Chiltern Main Line in respect of pathing and gauging for an SRFI. The recent email received by the Applicant from Network Rail (at Appendix D) is also referring directly to a number of issues raised. • <u>PFAS</u> – the Applicant is aware of the wider context and data regarding nearby (off-site) watercourses in the vicinity of the former RAF Upper Heyford airbase. In response the Applicant has undertaken testing on the OxSRFI Main Site, and can update application documents, including the CEMP, to provide information both about how we propose to remediate or manage PFAS on-site. However, based on the Applicant's work to date, there is limited PFAS impact in the watercourse on-site, with the levels being considerably lower than some of the levels known to have been recorded in other nearby watercourses, which have a more direct 'pathway' from PFAS source areas at the former RAF base. • <u>Diesel propulsion</u> – ES Chapter 15 (Climate Change) (Document 6.15/APP-183) considers non-diesel HGVs within Table 15.3 in response to the Stage 2 (statutory) consultation comments by OCC and CDC. It should also be noted that Table 15.3 of ES Chapter 15 confirms that the provision of EV charging points will be for 25% of car parking

RR Reference	Identity	Representation (Summary)	Applicant Response
			spaces, in accordance with current OCC requirements. Also, the Rail Report (Document 7.2A/APP-312) explains that passive provision is made within the track layout for future electrification, the southern and northern chords, reception sidings and southern headshunt all provide with suitable clearances to permit overhead 25 kV AC catenary to be installed in future if required. In the interim, the layout is fully accessible by diesel, bi-mode (diesel and electric via catenary) and tri-mode (diesel, battery and electric via catenary) locomotives. • <u>Potential Ardley passenger station</u> – the Applicant is engaged in constructive dialogue with OCC and CDC regarding their exploration of the feasibility of a new Station, including ongoing work on a SoCG on rail issues. It is noted that there is no committed location, formal layout plans, rail business case, or a planning application for the potential Ardley passenger station. Notwithstanding this, the Planning Statement Appendix 3 Passenger Rail Station Note (Document 5.4C/AS-050) provides an explanation of the context and work undertaken by the Applicant in respect of the potential Ardley passenger station. The Note concludes that the OxSRFI proposals do not prejudice proposals being advanced by any other parties and will actually deliver rail and accessibility improvements which could help facilitate such proposals (for examples, see Section 4 of AS-050). • <u>Loss of greenspace</u> – ES Chapter 7 (Landscape and Visual Impact Assessment) (Document 6.7/

RR Reference	Identity	Representation (Summary)	Applicant Response
			APP-175) confirms that circa 60% of the Application Site will be for green infrastructure and landscaping, which will provide access and biodiversity benefits including the delivery of a minimum 10% biodiversity net gain. The site currently has limited public access. The OxSRFI proposals will increase the extent of accessibility including retaining but diverting existing PROW, and adding to the network of local walking and cycling routes. • <u>Impact on dinosaur tracks</u> - ES Appendix 11.9 (Ardley Trackways Technical Note Rev) (Document 6.11/AS-080) sets out the proposed approach to mitigation for the Main Site. The proposed approach has been accepted by Natural England (RR-101).

Part 1C - APPLICANT RESPONSE TO RELEVANT REPRESENTATIONS SUBMITTED BY PARTIES WITH AN INTEREST IN LAND AFFECTED BY THE PROPOSED DEVELOPMENT

Responses to representations from consultees (bodies or individuals) who have an interest in land included within the Order Limits are provided in the table below:

RR Reference	Identity	Representation (Summary)	Applicant Response
RR-009	Anglian Water Services (AW)	The response is submitted by AW in its statutory capacity regarding water recycling assets and the sewer network, as well as the related role of surface drainage only. The comments include: • Concern in respect of pre-submission consultation. • Bespoke Protective Provisions (BPP) – AW have supplied BPPs for inclusion in the draft DCO and would welcome further discussions regarding the BPPs as they do not include AW's BPP's in Schedule 14 of the draft DCO (ref. APP-139). AW object at to the application at this stage based on the standard BPPs in the draft DCO. • SoCG – AW request further engagement in relation to a SoCG. • CEMP – further detail, including mapping, to assess if the scheme proposes appropriate and sufficient mitigation measures to reduce the risk of damaging utilities during construction. AW requests to be a consultee for final construction management plans. • Clash detection – further discussion with the Applicant to confirm, for example, any sensitive plant, open cut locations, access works,	The Applicant cannot confirm the bodies who were consulted by the Planning Inspectorate during the scoping exercise, but notes that AW do not appear to be included in Appendix 1 of the Scoping Opinion, however the Applicant's records reflect that AW was specifically consulted during the non-statutory consultation on 5th May 2022 and the Applicant's drainage consultants have had various consultation and discussion with AW since February 2022. Since the engagement with AW during statutory consultation, the Applicant has removed the previously proposed outfall connection to the AW foul water drainage network in Ardley. The Applicant notes that the foul water drainage strategy drawing appended to the Sustainable Drainage Statement – Main Site (Document 6.9C/AS-077) was out of date and an updated version will be submitted together with the documentation submitted with the Applicant's change application, the timing of which is explained in the Applicant's covering letter to its Procedural Deadline A submission. Following a review of the scheme proposals and potential clashes with AW infrastructure the only interaction with AW assets relates to an existing foul

RR Reference	Identity	Representation (Summary)	Applicant Response
		diversions of any above ground plant and shared access locations. • Sustainable drainage - AW recommends the final Drainage strategy seeks to utilise rainwater harvesting systems that align with the management of surface water on site. • Flood risk – in terms of sewer flooding, the FRA only refers to Thames Water assets, but the Applicant should also refer to the AW highly pressurised rising mains, located within/ adjacent to the public highway which serves Ardley. • Construction measures – AW supports measures in the application material (including the CEMP) to capture and remove pollutants and suspended sediments prior to runoff leaving the construction sites. The CEMP should include steps to remove the risk of damage to AW assets from plant and machinery (compaction and vibration during the construction phase). • Foul water drainage – AW requests clarification regarding foul water drainage requirements where the works fall within the AW catchment – connections to AW infrastructure for wastewater drainage, including surface water management, would not be acceptable. • Appendix 9.4: Sustainable Drainage Statement – Offsite and Highways (APP-266) refers to offsite works related to the Anglian Water catchment, but it is unclear whether foul water will be required, further clarity is required on this matter.	rising main which is located on land where the J10 highway mitigation (Work Nos. 14A, 15A and 15B) are proposed. Parcels 3/25, 3/26, 3/32, 3/33, 3/73 are within existing highway, and parcels 3/1, 3/2, 3/3, 3/6, 3/7, 3/7a, 3/7b, 3/8, 3/21a, 3/24, 3/34 are proposed to be subject to compulsory acquisition if no land arrangement can be agreed. The Applicant considers that the protection afforded by Part 6 of Schedule 14 provides the necessary measures to ensure that the rising main is protected during the works. The Applicant does accept however that further drafting should be incorporated to that Part of Schedule 14 confirming that the AW easement/rights relating to the rising main will be maintained on those parcels where compulsory acquisition might be exercised. Additional drafting will be included in the next dDCO to be submitted. The Applicant does not agree that AW's bespoke protective provisions are necessary. The Applicant notes that the ExA has requested a Statement of Common Ground between the Applicant and AW and the Applicant is engaging with AW in order to progress a draft. The Applicant does not consider that amendments to the CEMP are required – those construction measures approvals are covered through the protective provisions within Part 6 of Schedule 14. The proposals associated with the development within the AW jurisdiction are entirely highways proposals and as such there is no demand for the use of rainwater. Appropriate mitigation is proposed in

RR Reference	Identity	Representation (Summary)	Applicant Response
		• AW requests to be consulted when discharging requirements relating to the surface water drainage strategy and any foul water drainage system. • Cumulative - the sewerage network for the Ardley WRC catchment area is some 300m north of the Project site and is only accessible by crossing the active railway line. Therefore, AW would also like to highlight the potential cumulative effects should the sewerage pipeline need relocating with likely impacts on the Ardley community, through the generation of lorry and plant traffic.	terms of storing and restricting flows leaving these parts of the highway works. The proposed highway drainage will discharge via existing highway drainage networks or via networks of ditches / watercourses in line with local hydrology. Flows will be restricted to the appropriate rates with adequate attenuation provisions. No surface water from the highway works will connect into AW's waste water assets. Consultation on the discharge of requirements is to be undertaken by the discharging authority as appropriate. The Applicant does not consider it necessary or appropriate to include specific drafting referring to the consultation of AW in any requirements, nor is that common practice. The Applicant will agree protection measures for the rising main with AW as part of the detailed design of the highway works (which will include clash detection of the detailed highway proposals with the AW rising main) through the provisions of Part 6 of Schedule 14 to the dDCO (Document 3.1/APP-139). There are no additional cumulative impacts as works to utilities within the highway works, such as the AW rising main, are all part of the highway works.
RR-015	Biffa Waste Services	Biffa objects to the proposed removal of the Ardley In-Vessel Composting (IVC) Facility.	ES Chapter 13 (Materials and Waste) (Document 6.13/ APP-181) considers the effects of the capacity from the Ardley IVC facility removal, including a demonstration of stakeholder engagement and local

RR Reference	Identity	Representation (Summary)	Applicant Response
		The RR identifies some principal concerns which include the following: - the application fails to adequately assess the consequences of removing this safeguarded waste infrastructure; - The assessment relies on flawed assumptions regarding alternative treatment capacity, and - contains inaccuracies regarding the facility's planning and policy status. The RR also suggests that the submitted application does not demonstrate demolition is necessary. Biffa consider that the facility's loss risks a significant gap in organic waste treatment provision, conflicting with waste planning policy and the waste hierarchy.	capacity requirements (please see paragraphs 13.4.22 to 13.4.32 for more information). The ES Chapter uses the Oxfordshire Minerals and Waste Local Plan forecast capacity requirement for composting and food waste to 2031 and the Authority Monitoring Report (AMR) 2020 (prepared by OCC in May 2023) for the actual capacity. If the Ardley IVC is removed, there is still an approximate 33,000 tonnes per annum over capacity as of 2031. The ES Chapter sets out there would not be a significant effect from the loss of the Ardley IVC, but rather that there would be a negligible impact on capacity. Further information in relation to the justification and loss of the Ardley IVC Facility, is also provided within the Odour Report (Document 5.4D/APP-165) and paragraphs 5.48 and 5.81 of the Planning Statement (Document 5.4/APP-161).
RR-029	TLT LLP on behalf of Countryside Properties (Bicester) Limited	Countryside Properties (Bicester) Limited is the master developer of Kingsmere Bicester, a large residential led mixed use site of c. 2,400 dwellings with associated employment, commercial, retail, and other uses. The development has been largely built out and is substantially occupied with final development phases and associated site infrastructure in the final stages of delivery. Key points raised by the RR are: The Book of Reference (Document 4.5/APP-145) identifies that Countryside holds interests in various	Following further detailed investigations and discussions with Thames Water, including a visit to site to view the relevant drainage assets (chambers) where it is proposed OxSRFI will connect to the Thames Water foul drainage network (MH2403), the Applicant has confirmed that the connection point is not located within land parcel 9/34 where the Thames Water sewer records suggest it is. In fact, the relevant chamber is located within the public highway extents (within the current Order limits) and outside of the ownership of Countryside Properties (Bicester) Limited. Thames Water has confirmed this connection location is agreed in principle and has also

RR Reference	Identity	Representation (Summary)	Applicant Response
		plots, mostly within the adopted highway along Middleton Stoney Road and northern edge of Kingsmere Bicester. Of particular concern to Countryside is the acquisition of rights by the Promoter in respect of Plot 9/34, over which rights are sought to provide the connection of a new foul sewer to the existing public foul sewer. This forms part of Work No. 35 – Foul Sewer Outfall to Bicester. Countryside is concerned with the impact of the Project detrimentally impacting Kingsmere Bicester, including concerns over uncertainty of the final connection point, reinstatement of land post work completion, damage or disruption from construction and wider impact on estate drainage. The Land Rights and Negotiations Tracker dated March 2026 [APP-146] - Countryside has had initial engagement with the Promoter regarding an agreement to cover rights required for the foul drainage connection within Plot 9/34. Countryside has requested Heads of Terms for consideration on a without prejudice basis. However, it is considered premature to conclude at this stage that an agreement will be reached during the Examination given negotiations are only in their early stages. Countryside reserves the right to make further representations during the Examination process but in the meantime will continue to engage with the Promoter with a view to reaching a satisfactory agreement. If an agreement is signed and completed, Countryside will notify the Planning Inspectorate and withdraw this holding objection.	confirmed that it has no objection to constructing a new chamber on the existing sewer upstream of MH2403 (if required) to facilitate the connection. As a result of this, no compulsory acquisition of rights will be required from Countryside Properties and it is proposed to remove this parcel of land from the Order limits and the Book of Reference, Land Plans and other relevant application documentation will be amended accordingly. The Applicant intends to include this removal together with the other proposed changes to the Application as explained in the covering letter to its Procedural Deadline A submission dated 15 September 2026. The Applicant has confirmed this updated position to Countryside Properties (Bicester) Limited and expects that they will be in a position to withdraw their Relevant Representation once the Applicant has made its formal change request and the plot is removed from the Order limits.

RR Reference	Identity	Representation (Summary)	Applicant Response
RR-037	Dorchester Living (DL)	Dorchester Living (DL) is the promoter and developer of 'Heyford Park' focused on redevelopment of the site of the former RAF Upper Heyford to the immediate west of the OxSRFI main site. DL is in ongoing dialogue with the Applicant about numerous points, but the RR is based on the OxSRFI application as submitted, and does not reflect any recent discussions or clarifications provided by the direct engagement between DL and the Applicant. The RR is explicit that DL not do not object to the principle of the proposed SRFI, nor the need for new SRFIs. The focus of the RR is on a number of topics and details, in large part focused on the physical relationships and context of development at Heyford Park. The main issues and concerns raised are set out under various headings – these include (in summary): 2. and 3. Principal Issues: The key point relates to concern that OxSRFI has been prepared in isolation from Heyford Park which DL consider has only been viewed as an adjoining site requiring mitigation as opposed to a significant area of planned growth to be integrated with OxSRFI. DL repeat the view under this heading – and other headings – that the amount of CA land should be reduced. 4. Landscape & visual:	The Applicant's responses to key points made is structured using the same headings as those which feature in the RR. Given the duplication or repetition within the RR cross-references are made to points already addressed. The Applicant has met with DL regularly over the course of the preparation of the application. Verbal agreement has been reached on a number of matters and where relevant this is referenced in the Applicant's responses. Regular fortnightly meetings had been arranged and were taking place, unfortunately DL have cancelled recent meetings and further discussions will take place once those meetings re-commence. 2. and 3. Principal Issues: The Applicant does not recognise the concerns raised by DL regarding a lack of consideration or integration between OxSRFI and development at Heyford Park. The scheme would see infrastructure (green and transport) which directly aids integration and connectivity between the two sites and across a wider area (also see comments on other transport related headings below). With regard to the extent of integration, the evolution of the OxSRFI proposals began in 2019/20. At that time, residential led growth was primarily consented and under construction to the south of Camp Road with an allocation for approx. 1800 dwellings in the Local Plan. There were no formal proposals for

RR Reference	Identity	Representation (Summary)	Applicant Response
		The RR focuses on queries regarding the extent to which OxSRFI integrates with Heyford Park proposals, with particular reference to '<i>sense of arrival, identity and sense of place and the wider rural context</i>'. The RR seeks more than just mitigation of potential effects on Heyford Park, and suggests there has not been sufficient assessment of potential effects of OxSRFI. Queries and issues include whether the landscape strategy (including landscaped mounding) is the optimal design approach. 5. Transport - Passenger Rail: The RR refers to the OCC OxRail 2040 Strategy which identifies a potential future passenger Station as one of its priorities. The RR reflects the uncertain status of the emerging Station proposals, but seeks further evidence regarding whether there is physical capacity and compatibility with proposed rail freight traffic on the Chiltern Main Line, and between the OxSRFI terminal and potential new passenger Station if located south of Ardley. The RR also queries the definition and triggers for the proposed occupation of floorspace ahead of a fully functioning rail freight terminal. 6. Delivery of Heyford Park: The key point raised is that the OxSRFI scheme should not only consider Heyford Park development as a 'receptor' but as a more fundamental influence on the design of the SRFI. The emphasis of the RR is on potential opportunities arising from integration relating to infrastructure, including passenger rail,	additional large-scale 'new town' proposals adjacent to the western edge of the OxSRFI site. The current large-scale proposals were subject to a planning application as recently as 2025 (around the same time as the OxSRFI statutory consultation), by which time OxSRFI had been in the public domain for several years (the Stage 1 consultation was held in 2022). 4. Landscape & visual: The Applicant has included numerous elements of the scheme in direct response to the presence of the Heyford Park development. This includes the approach to the proposed Heyford Park Link Road which will sit in a broad landscaped corridor/ context, well screened and separate from the built development of OxSRFI, and which will ensure a 'sense of arrival' and identity of the main western access to Heyford Park. Following dialogue after receipt of DL's Stage 2 consultation response in Autumn 2025 the Applicant made changes directly in response to DL's concerns about potential effects, with changes including reduced max. building heights and increased landscaping heights and depths, with commitments made to implement more mature landscaping from the outset – please refer to the Consultation Report (Document 5.1/APP-147, paragraph 1.3.6). Having regard to recent meetings with DL, it is the Applicant's understanding that DL are content with the approach to the design of the OxSRFI scheme, in relation to the treatment of the Heyford Park Link Road and the treatment of the western part of the

RR Reference	Identity	Representation (Summary)	Applicant Response
		and cumulative effects of consented and future planned additional growth at Heyford Park. 7. Compulsory Acquisition (CA): With reference to the statutory tests, the RR raises questions regarding the extent to which the Applicant has demonstrated a compelling case in the public interest for all of the land proposed for CA. This includes questions regarding whether reasonable alternatives were considered during the evolution of the design of the OxSRFI scheme to reduce CA. The RR include numerous references to CA which features under almost every heading used in the RR focused on seeking justification for the land proposed and whether it could and should reasonably be reduced. Additional points made in the RR refer to: Utilities infrastructure – the RR refers to dialogue between DL and the nearby Energy from Waste operator regarding a potential future private wire energy connection. OxSRFI introduces uncertainty as to the future availability or deliverability of a physical route. Transport (highways) Modelling – DL refer in the RR to their request made to the Applicant to access highways modelling data used for the OxSRFI TA to enable further work on the Heyford Park ‘new town’ TA which has been requested by National Highways and OCC.	Main Site, closest to DL’s committed housing scheme, including the approach to bund heights, landscaping and building positions and scale. The submitted LVIA (ES Chapter 7/APP-175) follows a well-established and robust methodology (based upon GLVIA3) which provides a sound assessment of the likely effects. The queries about the role of mounding (bunds) are noted, but by way of the policy context, the NPS expressly refers to the use of bunds as an appropriate form of visual and noise mitigation for SRFIs (at paragraphs 5.166 and 5.240). 5. Transport - Passenger Rail: The Applicant is engaged in constructive dialogue with OCC and CDC regarding their exploration of the feasibility of a new Station, including ongoing work on a potential SoCG on rail issues. As set out in the Passenger Rail Station Note (Document 5.4C/AS-050) appended to the Planning Statement, OxSRFI would not prejudice the delivery of a future passenger Station and indeed could help as a result of signalling and other rail infrastructure proposed. The issues raised by the RR are fully addressed, reinforced by a signed SoCG between the Applicant and Network Rail which confirms the compatibility of the schemes. In dialogue with OCC, SLC has accepted the Applicant’s evidence regarding rail capacity. The DCO is clear that the floorspace occupation is restricted to no more than 232,258 square metres of

RR Reference	Identity	Representation (Summary)	Applicant Response
			warehouse floorspace (including ancillary office) until the terminal is 'available for use' which includes connections to the Chiltern Main Line (the timing of delivery of which sit outside of the Applicant's control). 6. Delivery of Heyford Park: The response made to the same points under items 2, 3 and 4 address this. 7. Compulsory Acquisition (CA): The Applicant is confident that the land currently proposed to be secured via CA from DL is necessary and appropriate, and is needed to enable the comprehensive delivery of the OxSRFI scheme including land needed to deliver proportionate mitigation and satisfies the tests. The Applicant requires a small number of plots from DL for OxSRFI. These are 4/5, 4/5a, 4/6, 4/18, 6/10 and 6/11 (noted in the Book of Reference as land owned by Upper Heyford GP Limited and Upper Heyford Nominee Limited which are DL companies). The largest of those are 4/5 and 4/6 (currently public adopted highway owned by DL but which will be stopped up by OxSRFI). The Statement of Reasons (Document 4.1, APP-143) describes the purpose for which the Applicant requires these plots of land. The Applicant notes that reference to plot 4/6 is missing from the table at Appendix 1 in the Statement of Reasons (page 41) and this should be included in the line describing the

RR Reference	Identity	Representation (Summary)	Applicant Response
			use of plot 4/5. The Applicant will correct this in an updated Statement of Reasons to be submitted. In particular, and noting that the most significant land required from DL is the Upper Heyford Road and the strip of land immediately north of that road, (being replaced by the proposed Heyford Park Link Road) the need for the Heyford Park Link Road is detailed in paragraphs 8.27 – 8.40 of the Transport Assessment (Document 6.3A, ES Appendix 3.1 part 1 of 11/AS-055). The Applicant's approach to the design of the Heyford Park Link Road is explained in the Highways Design Approach Document (paragraphs 3.7 – 3.14, Document 5.5C, APP-168). As explained in this response, regular engagement has taken place in a collaborative manner on a range of topics but at the request of DL, the focus of more recent discussion has been to prioritise transport and landscape in advance of progressing land negotiations. The Applicant has therefore not been able to reach voluntary agreement in respect of the interests needed at this stage but dialogue remains ongoing between the parties, with the Applicant willing and keen to reach an agreement without requiring CA. The Applicant has updated the Land and Rights Negotiation Tracker (Document 4.4) at Procedural Deadline A to include more detail on the extent of attempted negotiation with DL for clarity to assist the ExA. The Applicant had taken a less detailed but more

RR Reference	Identity	Representation (Summary)	Applicant Response
			holistic approach to the explanation of engagement in its submission version (Document 4.4/APP-146) but the Applicant considers, noting the position DL has taken, it is appropriate to include a detailed engagement schedule at this stage. Additional points: <u>Utilities Infrastructure</u> – the potential future private wire connection between Heyford Park and the Energy from Waste Facility had not been discussed with the Applicant and the RR's are the first time the Applicant has been made aware of this matter. Notwithstanding, the Applicant sees no reason why an appropriate route for a private wire connection cannot be found and is willing to discuss this matter further with DL. <u>Transport Modelling</u> – the Applicant shared the requested modelling evidence with DL in July 2026 to enable them to update and further progress their Transport Assessment.
RR-132	Southern Electric Power Distribution plc (SSE)	Notes the interaction of the authorised development with SSE infrastructure and the necessary diversions. Refers to engagement with the Applicant. Requires its standard protective provisions in the DCO.	The Applicant is in discussions with SSE in relation to the form of protective provisions to be included in the draft DCO. The Applicant returned amended protective provisions to SSE on 11 September. These largely accept SSE's template drafting. However, there are some points on which the Applicant has proposed alternative drafting as follows: 1. The Applicant proposes that the minimum £50m blanket insurance figure be project-specific rather than a standard sum. A minimum of £50m has

RR Reference	Identity	Representation (Summary)	Applicant Response
			not been assessed as being related to the works to be carried out. The Applicant therefore proposes that it is not suitable to include a minimum figure which may greatly exceed what would be proportionate in the circumstances. The same applies to the standard bond and PCG levels. 2. The Applicant has included drafting requiring SSE not to unreasonably withhold or delay its approval to any requests for approval of plans, document or other information from the Applicant. Deemed approval then applies if SSE does not respond within the set timescale. This mirrors the approach being sought by the Applicant throughout the DCO and the protective provisions in particular. This is important for two reasons. Firstly, this is a nationally significant infrastructure project which requires approvals from multiple statutory undertakers and authorities. Timely engagement by all parties is essential to ensure the construction programme can proceed as planned. Secondly, the Applicant has agreed not to exercise compulsory acquisition powers over SSE's apparatus without SSE's consent. The Applicant therefore accepts that SSE's approval will be required for all relevant works. However, in the absence of compulsory acquisition as a fallback mechanism, the Applicant requires assurance that the approval process will not give rise to undue delay. The deemed approval provisions provide that certainty and enable the project to progress where SSE has failed to respond within the prescribed timescale.

RR Reference	Identity	Representation (Summary)	Applicant Response
			The Applicant will continue to engage with SSE and is hopeful that it can reach an agreed position during the course of examination.
RR-133	Southern Gas Networks (SGN)	The Applicant seeks compulsory acquisition of land and rights in which SGN is interested, and the proposed development will interact with SGNs assets. SGN objects so as to protect its interests in land and apparatus and the safe and effective operation of the gas transportation network through suitable protective provisions in the DCO. Requires its standard protective provisions in the DCO.	The RR is not correct in stating that the Applicant seeks compulsory acquisition of land and rights over land in which SGN is interested. As noted in the Book of Reference (Document 4.3/APP-145), SGN has interests in plots 9/10a, 9/29, 9/29b, 9/30, 9/36 and 9/38. None of these plots are subject to compulsory acquisition. These plots are shown hatched black on the Land Plans and as explained in paragraphs 1.10 and 1.11 of the Introduction to the Book of Reference, are included in the Book of Reference in strict accordance with the APFP Regulations to reflect the interests in the land. These plots will be subject to highway and street works only, land interests are not required by the Applicant. SGN's interests in these plots relate to gas mains within the highway boundary. As noted in the Explanatory Memorandum (Document 3.2/APP-140), the Applicant considers the Part 6 protective provisions to be suitable and proportionate for SGN assets given that the authorised development does not require any intrusive works near to high risk apparatus (specifically a high pressure gas main). The Applicant understands that there is a high pressure gas main in the vicinity of J9 of the M40 motorway, but outside of the area within which physical works are required (and beyond the distance which requires protection or even notification in the

RR Reference	Identity	Representation (Summary)	Applicant Response
			ordinary course of carrying out works), and medium pressure gas mains within the B4030. The high pressure gas main is underneath the A34 towards the western end of plot 9/36, where only speed signs are required. With regards to the works in the B4030, the Applicant will be installing a foul rising main which will consist of single pipe of a small diameter. As per the ES Appendix 9.3 Sustainable Drainage Statement - Main Site (Document 6.9C/AS-077), this is proposed to be constructed using 280 mm PE100 SDR11 pipe. Contractors carrying out works within the highway must be appropriately licensed and will therefore be expected to be familiar with SGN's requirements and procedures for working near its apparatus. The Applicant provided to SGN the proposed 'generic' protective provisions (included at Part 6 of Schedule 14 to the dDCO), explaining that due to the nature of the works involved, those provisions were considered to appropriately protect the SGN assets. Moreover, those provisions are frequently included within DCOs particularly where interaction with such assets is in the 'ordinary course' of development as opposed to major interaction requiring diversions or working in close proximity for significant works. This is an entirely proportionate and reasonable approach and would be the case for normal street or highway works undertaken outside of a DCO context. The Applicant disagrees that SGN's standard protective provisions are necessary in these

RR Reference	Identity	Representation (Summary)	Applicant Response
			circumstances to “ensure public safety” and considers that referring to this in an attempt to force more onerous provisions and indemnities on the developer seeking to deliver an NSIP is unreasonable. Most significantly, it is simply not necessary for the nature of these works, which, to be clear, are limited. Adequate protection is afforded through the provisions in Part 6 of Schedule 14 of the dDCO which require the provision of indemnity and submission of details of the works.
RR-096	Savills, on behalf of Meyrick-Jones LLP	Savills submits on behalf of the landowner, Meyrick-Jones LLP, in respect of Land Plan Sheet 2 of 10, Plots 2/4 and 2/10. The RR notes the Book of Reference’s identification of the relevant land under “Category 1 Owner” and requests that the Applicant correct its land ownership records with alternative details provided. The RR confirms constructive ongoing engagement with the Applicant regarding an agreement for proposed bird mitigation land, its location, extent and the measures needed to satisfy DCO requirements.	The Applicant is aware that the title register has now been updated at HM Land Registry since the finalisation of the Book of Reference and this change in the registered proprietor was reflected in the Applicant’s S59 Certificate. The Applicant is pleased to confirm that Heads of Terms for a revised voluntary arrangement for the proposed ecological mitigation, as noted in the RR, are now agreed and the parties will now progress the legal agreement. The Applicant confirms that the updated landownership position will be reflected in the next Book of Reference to be submitted.
RR-142	Valencia Waste Management Limited	Notes its land interest in part of the Order limits.	The Applicant continues to engage with Valencia Waste Management Limited in respect of its interest in the land and to endeavour to reach voluntary agreement. And progress, whilst slow, remains positive.

RR Reference	Identity	Representation (Summary)	Applicant Response
			The Applicant met with Valencia in August having provided further response to enquiries raised and to move forward land negotiations. Valencia advised that they would be in a position to revert to the Applicant in September/October and the Applicant will continue to seek agreement.
RR-146	Viridor Limited	Viridor is the owner/operator of the Ardley Energy Recovery Facility (ERF), and does not object in principle to OxSRFI, recognising the scheme's potential strategic and economic benefits. The RR seeks assurance that construction, operation and maintenance of the Proposed Development will not adversely affect continued ERF operation, given significant proposed highway works near the ERF access junction and the facility's reliance on regular HGV and staff movements. Key issues to ensure are addressed include ensuring safe and efficient access is maintained at all times. Viridor confirms ongoing but unconcluded discussions with the Applicant regarding an Agreement for Works (plots 7/11 and 7/11a) and an Agreement for Easement (plot 7/40), and reserves its position on land rights pending finalisation.	The Applicant welcomes confirmation that Viridor Limited recognises the scheme's (OxSRFI) potential strategic and economic benefits. This principle was reinforced by the support letter signed by Viridor Limited which was submitted by the Applicant Document 5.1K/AS-049, Appendix 38, pages 194-197. The Applicant fully understands the importance of retained safe and efficient access to the Viridor ERF facility throughout construction and operation of the OxSRFI. Construction traffic is managed as part of the Construction Environmental Management Plan (CEMP) (Document 6.2C/APP-189) with detail to also form part of phase specific CEMPs in due course, including for works which may affect the B430 from where Viridor's access is taken. A key part of the construction (and operational) traffic management strategy is for all HGV movements to access the OxSRFI site from the north (via M40 Junction 10) - this will prevent any specific concerns held by Viridor regarding HGV traffic interacting with its access. Please also refer to the Construction Traffic Management Plan (CTMP), Appendix 38 of the TA (Document 6.3A.10/AS-064, pages 84 to 99), which sets out the routeing of construction traffic.

RR Reference	Identity	Representation (Summary)	Applicant Response
			The Applicant can confirm that discussions with Viridor are progressing regarding an Agreement for Works (plots 7/11 and 7/11a) and an Agreement for Easement (plot 7/40).
AS-087	Network Rail Infrastructure Limited	Objects in relation to the sought compulsorily acquisition powers. In order for Network Rail to be in a position to withdraw its objection Network Rail requires: 1) adequate protective provisions to be included within the Order (and for the avoidance of doubt Network Rail require these Protective Provisions to be in the form set out at Appendix 1 to this Relevant Representation); 2) the Promoter to enter into a side agreement (in a form acceptable to Network Rail) that regulates and requires: a) if acceptable in principle to Network Rail, the voluntary grant of the rights necessary to deliver the Scheme; b) a restriction not to compulsorily acquire any land or rights over Network Rail's land or extinguish any rights which Network Rail hold the benefit of; and c) the necessary safeguards and mitigation measures to maintain the safe and efficient operation of the Railway; d) the carrying out of works on Network Rail-owned land in a manner which ensures Network Rail's full compliance with its statutory and regulatory duties.	The Applicant was surprised to see the RR submitted by Network Rail (NR) which did not acknowledge the extensive and positive technical engagement between the parties over the past 7 years, and which focussed purely on the land acquisition arrangements which are naturally slower to progress in schemes of this nature, whilst technical details are prioritised. The objection is at odds with the nature of the relationship and progress between the parties particularly given that a Statement of Common Ground had already been signed prior to the submission of the RR. NR has explained to the Applicant that its RR objection is standard practice where voluntary agreements have not been concluded and has reassured the Applicant that its position from a technical perspective is as set out in the SoCG. Engagement between NR and the Applicant continues including meetings on a bi-weekly basis. The ExA will note the extensive progress with NR from the Application, including the Agreed Position Statement (Appendix E of the Rail Report – see Document 7.2A/APP-312) and further, that a Statement of Common Ground was entered into between the parties in May 2026, shortly after the Application was submitted. This SoCG (Document 8.1/AS-092) was submitted to the ExA in August 2026.

RR Reference	Identity	Representation (Summary)	Applicant Response
			As confirmed in the table at paragraph 5.251 of the Explanatory Memorandum (Document 3.2/APP-140) and reiterated in the SoCG (section 7), negotiation on appropriate protective provisions for the benefit of NR are ongoing. As at Procedural Deadline A, the Applicant can confirm that positive progress has been made in respect of negotiating appropriate agreement in respect of the protective provisions and land arrangements and revised drafting has been returned to NR for their review and consideration. The Applicant is confident that in reaching agreement on the technical matters and protections for the railway including detail of the works and safeguards for their carrying out, there will be no serious detriment to NR's undertaking because NR will have its required controls over the carrying out of the works.

PART 2 - APPLICANT'S RESPONSE TO INDIVIDUAL RELEVANT REPRESENTATIONS

- 2.1 The following section of this Summary document captures the common themes and comments raised in Relevant Representations from individual members of the community.
- 2.2 This is presented in a narrative report organised by theme or issue to avoid repetition where very similar or identical points have been raised by multiple respondents. The themes or issues listed are done so in an approximate order which reflects the number of representations which raise each issue, with the most common issues first (i.e. those raised by most representations), and the less commonly raised issues further down this section. This report addresses the concerns raised in a single response to each identified issue, with cross-references to relevant parts of Part 1 of this document where statutory bodies, organisations and local authorities also raised similar points or issues and where the response given is of relevance.
- 2.3 For each topic or theme included below, a list of those respondents is included to enable interested parties to understand how their Representation has been considered. While the Applicant has taken care to refer to all Representations considered under each heading, there is some considerable overlap between many of the issues and themes identified, and so some lists of respondents may not be exhaustive in every case.

Traffic and Transport issues *(including regarding reliance on road transport; local road safety concerns; a perception of too much road infrastructure; questions about the travel plan)*

- 2.4 This is by far the most frequently raised topic included within representations received from the local community. As shown in Part 1, it is also a common topic among queries and comments from statutory bodies, including numerous Parish Councils.
- 2.5 Points raised frequently by local people focus on concerns that the traffic generated by OxSRFI will exacerbate existing problems on what is considered by many residents to be an already congested local road network, with particular concern about the potential for additional traffic in villages. While many welcome the principle of moving freight from road (HGVs) to rail, they are concerned that the local roads surrounding the site will still see considerable HGV movements which could add to local congestion and other impacts (see below regarding noise and air quality).
- 2.6 While many representations acknowledge the likely improvements offered by OxSRFI via the proposed Highways Works, including improvements at M40 Junction 10, others offer the opinion that the works will not be adequate, particularly when viewed in the context of increases in traffic from other potential or planned developments (also see cumulative issues below). Some specific queries raised refer to how future employees would access the site, and the likelihood of high reliance on the private car. This includes some very specific

comments, including one regarding concerns about a lack of pedestrian crossings in Heyford Park.

- 2.7 As is set out in responses above in Part 1, there has been considerable work by the Applicant with the main statutory highways consultees, notably National Highways and Oxfordshire County Council (OCC) as well as Cherwell District Council (CDC) over several years to prepare a robust and comprehensive Transport Assessment (TA, Document 6.3A.01/[AS-055](#)). The submitted TA identifies the likely impacts of the OxSRFI scheme and has informed the comprehensive package of mitigation proposed to minimise or avoid those otherwise likely adverse impacts, and to deliver benefits to local road-users as well as pedestrians, cyclists and public transport users. This has included explicit consideration of safety issues, as required by regulations and best practice, and extensive constructive dialogue and collaboration with the relevant statutory consultees and other stakeholders. ES Chapter 3 (Transport) (Document 6.3/[APP-171](#)) explains that active travel routes and changes to the PRoW network will provide a much-improved network of high-quality pedestrian and cycle routes in the surrounding area which will enable and promote active travel and a shift to sustainable transport modes, including new links of relevance to Heyford Park residents.
- 2.8 The Representations of National Highways and OCC – see [RR-100](#) and [RR-109](#) respectively - and the Applicants responses to them above provide significant detail regarding issues agreed, and the limited number of outstanding issues. As reflected in Part 1 above, the submitted TA has been informed by modelling overseen and agreed by these consultees (in a Transport Working Group, TWG). The modelling shows that the proposals would be effective in mitigating the impacts of OxSRFI, with traffic drawn back to the Strategic Road Network as a result of improved capacity, and away from local and village roads. As discussed further below, this includes having taken explicit account of cumulative traffic with other consented and proposed developments nearby using assumptions and data agreed by the TWG. Therefore, while many of the traffic and transport concerns or queries raised by local residents are arguably understandable, they are not borne out or supported by the evidence submitted, nor by the representations of the statutory consultees who have a role to ensure the impacts on the strategic and local road networks are both properly assessed and comprehensively mitigated. While the proposals would deliver significant new road infrastructure, this is proportionate to the likely impacts and to ensure an acceptable impact on the network overall. As described above, this includes consideration of potential cumulative traffic from other planned and committed developments in addition to OxSRFI traffic.
- 2.9 In addition to infrastructure interventions, the proposals include a site-wide Framework Travel Plan, with Requirements for future occupiers/employers to provide their own specific Travel Plans, to encourage and incentivise use of non-car modes and reduce reliance on single occupancy cars. The Framework Travel Plan (Document 6.3B/[APP-203](#)) has been agreed with OCC. It includes agreed modal shift targets that reflect the significant package of connectivity improvements that will be provided by the Proposed Development, as described in the Sustainable Transport Strategy (TA Appendix 1, [AS-055](#)) and Public

Transport Strategy (TA Appendix 5, within [AS-056](#)). The single vehicle occupancy target for the Proposed Development is 68%, with the remaining 32% of trips to be made by healthier 'active travel' and lower carbon transport options. However, the TA assesses the traffic impact of the Proposed Development for a range of scenarios – including with and without the effect of the Travel Plan on reducing vehicle trips. The assessments demonstrate that the proposed Highway Works would mitigate the impact of the Proposed Development on the operation of the highway, and enable movement by a range of modes of transport other than single occupancy private car.

2.10 Representations received on this issue include the following:

Relevant Rep Reference	Name	Relevant Rep Reference	Name
RR-002	Al Grenfell	RR-073	Katherine Harris
RR-003	Alan Holder	RR-078	Kevin Mayo
RR-004	Amanda Goodger	RR-079	Khadija Iqbal
RR-005	Amy Molyneux	RR-083	Louise Holder
RR-008	Andrew Hodgson	RR-084	Louise Soanes
RR-010	Aric Barcena	RR-087	Luke Molyneux
RR-011	Asha Gill	RR-089	Marion Moore
RR-013	Benjamin Branch	RR-090	Mark Ellis
RR-018	Bushra Mayet	RR-091	Mark Hiles
RR-026	Chris D'Este-Hoare	RR-095	Melanie Greenwood
RR-028	Chris Lane	RR-104	Nick (<i>no surname</i>)
RR-030	Dan Harris	RR-105	Nicky Elliott
RR-031	Daniel Whitten	RR-111	Paul Rodgers
RR-033	David Darst	RR-112	Peter Deeley
RR-035	Desislave Georgieva	RR-113	Peter John Cavill
RR-036	Diogo Vieira	RR-115	Rachel Ash
RR-038	Elizabeth Wilson	RR-117	Rachel Vangucci
RR-040	Emma Sweetland	RR-116	Rachel Ellingham
RR-044	Florence Douglas	RR-118	Rebecca Siena Parker
RR-047	Gay Hawkins	RR-119	Richard Allen
RR-048	Geoffrey Johnston	RR-120	Richard Parnell
RR-049	Georgia Douglas	RR-121	Rob Janko
RR-051	Grant Underwood	RR-122	Ruth Corkin
RR-052	Harrison Blake	RR-123	Sally Munnings
RR-055	Henriette van der Blom	RR-125	Samantha Rollinson
RR-061	James Hookins	RR-126	Sandra Wilkins
RR-062	James Michael Fraser	RR-129	Siobhan Roberts
RR-063	James Westbrook	RR-131	Sonja Hall
RR-064	Jamie Whitfield	RR-134	Stanislava Obermajerova
RR-065	Jamie Baker	RR-137	Thomas Evans
RR-067	Janet Lince	RR-139	Timothy Moore
RR-068	Jean Conway	RR-141	Uzma Ullah
RR-069	Jean Morgan	RR-143	Valerie Flanagan
RR-070	Joanne Elizabeth Parker	RR-145	Vasile Sabau
RR-072	Juliet Cornford		

Specific local issues regarding Ardley Bypass

- 2.11 A small number of respondents refer to specific concerns or issues regarding the Ardley Bypass, including with regard to the construction phase of that element of the proposed highways works. These representations either:
- seek early delivery of the Ardley Bypass to ensure it is fully delivered and operational in advance of any construction activity on the Main Site (i.e. so it serves as an effective ‘haul route’ for all remaining construction traffic); or
 - question the benefit of the Ardley Bypass, suggesting it will not prevent adverse effects from traffic on local roads or benefit the local community.
- 2.12 The Applicant’s programme includes early delivery of the Ardley Bypass which also includes works at its southern end to deliver the new site access for OxSRFI. The Ardley Bypass will be delivered in the first phase of highways works and must be operational before the first warehouse unit is brought into use. The Bypass works would essentially replace the current B430 through Ardley village, closing the village to through-traffic, and so once complete, ongoing Main Site construction traffic as well as any employees on the site once operational, would also use that route. The Bypass will reduce through traffic in Ardley, and thereby reduce existing noise and air pollution associated with traffic in the village.
- 2.13 The highways strategy for the OxSRFI scheme, which includes the delivery of improvements to M40 J9 and J10, plus the Ardley Bypass and Middleton Stoney Relief Road, will direct vehicles accessing the Main Site to use the strategic highways network instead of local roads. This will deliver notable benefits in terms of reduced through-traffic and congestion on local roads, supported by HGV Routeing measures and associated signage.
- 2.14 Representations received on this issue include the following:

Relevant Rep Reference	Name
RR-001	Adrian Tierney
RR-048	Geoffrey Johnston
RR-063	James Westbrook
RR-066	Jane Rosetta Jana
RR-080	Kim Wilson
RR-090	Mark Ellis
RR-102	Nicholas John Wilkins
RR-113	Peter John Cavill
RR-123	Sally Munnings

Impacts on local villages and residential amenity (including Air Quality, Noise and Lighting)

- 2.15 Representations considered under this heading are relatively wide-ranging, with reference to a number of different potential issues or concerns, and with a not insignificant overlap with points made about traffic and transport (discussed above). The themes and issues raised in this group of Representations include reference to the following:
- Noise from traffic during construction and operation, and from activity on-site once operational, including potentially at night;
 - Concerns about the potential for increased HGVs in villages and negative impacts on local environmental quality as a result (including noise);
 - Lighting effects from the site on nearby areas and communities;
 - Air Quality effects on local communities;
 - General but non-specific and brief representations about the potential for 'detrimental' impacts on villages, including some references to visual changes as a result of new infrastructure and buildings (also see below regarding 'scale' and landscape issues).
- 2.16 A proportion of these representations include comments about the potential for cumulative issues and impacts, for example raising concerns that there may be combined noise and lighting effects by several developments all relatively close together. Such issues are referred to under the '**cumulative effects**' heading above.
- 2.17 The Environmental Statement (ES) includes assessments of the potential for these type of effects and issues, including explicitly making worst-case assumptions about the potential for night-time (24hr) operations on the site. Respectively, these topics are dealt with in ES Chapter 4 (Air Quality and Odour, [APP-172](#)), ES Chapter 5 (Noise, [AS-066](#)), ES Chapter 8 (Lighting, [APP-176](#)). The ES makes worst-case assumptions about the likely effects of the proposed development, and the Applicant engaged with the Environmental Protection team at CDC to agree the methodology and data sources to inform the assessments, where relevant.
- 2.18 Regarding noise the ES concludes that the embedded mitigation avoids significant adverse noise impacts both during construction and operation on nearby residential receptors around the Main Site, including consented (but not yet constructed) housing sites at Heyford Park which are among the closest. The only potentially significant residual noise issues identified is on Middleton Stoney Road (A4095) in Bicester where changes to traffic behaviour (reassignment) on the road network following the OxSRFI road improvements may generate additional night-time effects. The Applicant has proposed mitigation through a fund to enable additional glazing at affected houses in that specific area of Bicester.
- 2.19 The Lighting ES assessment concludes that the embedded mitigation avoids significant adverse impacts both during construction and operation on the closest existing and consented residential properties, including at Heyford Park.

It also confirms the same for ecological receptors due to use of modern lighting installations and design to target lighting where it is needed, and avoiding spill into other areas.

- 2.20 The ES confirms that air quality is currently good in the local area, and the proposed development will not result in any significant effects. The most likely effects are temporary during construction, but a range of measures are proposed to mitigate and reduce dust (via the CEMP).
- 2.21 The proposals have been designed to minimise effects on off-site 'receptors' and on the wider area through design and the landscape and visual mitigation proposed. The substantial green and landscaped buffers around the Main Site, particularly around the southern and western boundaries will minimise visual effects from new buildings through the use of mounding (bunds) as part of extensive green infrastructure on-site. The NPS expressly refers to the use of bunds as an appropriate form of visual and noise mitigation for SRFIs (at paragraphs 5.166 and 5.240).
- 2.22 Also see the responses to issues raised in the representations from CDC (RR-024), Heyford Park Parish Council (RR-057), Bucknell Parish Council (RR-017), and Middleton Stoney Parish Council (RR-099) in Part 1 of this Report.
- 2.23 Representations received on this issue include the following:

Relevant Rep Reference	Name (and indication of village of concern where stated)	Relevant Rep Reference	Name (and indication of village of concern where stated)
RR-002	Al Grenfell (Middleton Stoney)	RR-087	Luke Molyneux
RR-005	Amy Molyneux	RR-089	Marion Moore
RR-011	Asha Gill	RR-090	Mark Ellis
RR-026	Chris D'Este-Hoare (Camp Rd)	RR-091	Mark Hiles
	Chris Kimber	RR-095	Melanie Greenwood
RR-028	Chris Lane	RR-104	Nick (no surname)
RR-032	Darron Hall (Heyford)	RR-110	Pam D Rochford (Ardley)
RR-036	Diogo Vieira	RR-112	Peter Deeley
RR-040	Emma Sweetland	RR-113	Peter John Cavill
RR-045	Gay Hawkins		Rachel Ash
RR-049	Georgia Douglas	RR-117	Rachel Vangucci (Heyford)
RR-051	Grant Underwood	RR-120	Richard Parnell
RR-052	Harrison Blake (Heyford)	RR-123	Sally Munnings (Ardley)
RR-060	Ivan Ward	RR-124	Sam Carr-Archer (Stoke Lyne)
RR-065	Jamie Baker (Heyford)	RR-129	Siobhan Roberts (Heyford)

Relevant Rep Reference	Name (and indication of village of concern where stated)	Relevant Rep Reference	Name (and indication of village of concern where stated)
RR-072	Juliet Cornford	RR-134	Stanislava Obermajerova (Heyford)
RR-073	Katherine Harris	RR-137	Thomas Evans
RR-074	Katie Bedford (Heyford)	RR-141	Uzma Ullah (Heyford)
RR-081	Linda Morris (Heyford)	RR-143	Valerie Flanagan
RR-083	Louise Holder	RR-144	Vasile Sabau (Heyford)

Environmental Impacts including ecological effects and loss of green space (including loss of agricultural land)

- 2.24 There is some overlap between issues raised in some of the Representations considered under this heading with the issues raised in the above category or theme (relating to local villages and amenity). However, the themes and issues covered by these Representations covers a more diverse range of issues and is more environmental in its focus (rather than focusing on human ‘receptors’ and on communities or villages).
- 2.25 The issues most frequently raised include:
- Concerns about loss of habitats currently on the site, including removal of trees and hedges;
 - General comments and concerns regarding loss of countryside to development (including references to loss of agricultural land).
- 2.26 Representations in this category also include a very small number which refer to the potential for impacts on any currently unknown and unidentified dinosaur footprints if they are present in limestone below the site. Similarly, a very small number of representations refer to local flood-risk issues.
- 2.27 The Applicant’s responses in Part 1 of this document to various representations also cover many of these issues: specifically, see the representations from and responses to Natural England (RR-101), Cherwell District Council (RR-024), and Oxfordshire County Council (RR-109), as well as responses to local Parish Councils.
- 2.28 The application includes a comprehensive ecological assessment set out in ES Chapter 6 and associated appendices (Document 6.6/[APP-174](#)). The assessment identifies that the Main Site has a relatively limited ecological value overall due to the current dominance of arable field compartments which support limited semi-natural vegetation and have limited botanical diversity. However, there are habitats and features of interest and value, as defined and assessed in the submitted ES, and while many are to be retained as part of the on-site green infrastructure and landscaping, there will inevitably be some losses of existing habitats, including a relatively small proportion of the existing

trees and hedges. The proposals are not required to deliver 10% BNG but the Applicant took the view early on that it would seek to include this as part of the proposals, with details submitted (BNG details form appendices to the ES Chapter, found at [AS-072](#) and [AS-073](#)). The proposals include specific measures to mitigate or compensate for losses of habitats and for the effects on specific species of fauna known to be present or to make use of the site, including farmland birds, bats and badgers. The Applicant has engaged directly and over a long-period with Natural England regarding interactions with SSSIs, and regarding mitigation works proposed for which a license will be required (the response to the Natural England representation includes references to 'Letters of No Impediment' already issued, with constructive detailed dialogue ongoing).

- 2.29 Following comments received from CDC regarding the Arboricultural Assessment, updates and amendments will be made by the Applicant, and revised versions submitted to the Examination process in due course.
- 2.30 The Applicants response to the representation from CDC above includes **Agricultural land** issues. The ES (Chapter 14, Document 6.14/[AS-082](#)) shows that a very small percentage (approximately 9%) of the agricultural land resource proposed to be lost is in the 'best and most versatile' quality. The application documents recognise this as significant effect in ES terms. However, harm will be mitigated by a Soil Management Plan (SMP) required by the Construction Environmental Management Plan (CEMP Document 6.2C, see ES Appendix 2.3, [APP-189](#)) for relevant phases of construction activity. The SMPs will be phase- and site-specific to ensure protection of the resource and best re-use of soil resources, preventing damage to soils and enabling their re-use to support landscaping and habitat creation on-site.
- 2.31 **Flood-risk** is not raised widely and there are few specific issues locally or on-site regarding flood-risk, with areas of risk highly localised and limited to the small-scale watercourses within the application site. The submitted drainage details including flood-risk assessment (ES Chapter 9/[APP-177](#)) provide details of sustainable drainage measures to manage surface water, resulting in some off-site betterment as a result of more regulated water discharge from the site.
- 2.32 The Applicant has considered the potential for palaeontological features (e.g. dinosaur footprints) to be found on-site during construction. This potential is considered low given that only a small proportion of the proposed earthworks will encounter the same limestone geological layers found off-site, some parts of which contained preserved footprints. In response to this potential risk of harm to any such unknown and undesignated features of interest the Applicant has proposed a 'watching-brief' during relevant construction works. Given the very limited areas of appropriate geology which will be disturbed on-site, the Applicant is of the view that such finds are of low probability, but the watching brief is considered an appropriate and proportionate mitigation response. The Applicant notes and welcomes the positive response of Natural England ([RR-101](#)) who have confirmed agreement to the Applicant's approach to avoiding or mitigating potential effects on the nearby SSSI.

2.33 Representations received on this issue include the following:

Relevant Rep Reference	Name
RR-004	Amanda Goodger
RR-005	Amy Molyneux
RR-011	Asha Gill
RR-118	Bushra Mayet
RR-023	Charlotte Harris
RR-026	Chris D’Este-Hoare
RR-027	Chris Kimber
RR-030	Dan Harris
RR-038	Elizabeth Wilson
RR-040	Emma Sweetland
RR-048	Geoffrey Johnston
RR-051	Grant Underwood
RR-055	Henriette van der Blom
RR-060	Ivan Ward
RR-063	James Westbrook
RR-066	Jane Rosetta Jana
RR-079	Khadija Iqbal
RR-094	Meena Odedra Pinder
RR-105	Nicky Elliott
RR-116	Rachel Ellingham
RR-117	Rachel Vangucci
RR-118	Rebecca Siena parker
RR-122	Ruth Corkin
RR-125	Samantha Rollinson
RR-141	Uzma Ullah
RR-137	Thomas Evans
RR-145	Vasile Sabau

Cumulative Issues

- 2.34 As referred to above in the context of traffic and transport, cumulative issues were explicitly part of many representations received on that topic. However, other wider potential cumulative issues or effects were also identified (beyond transport issues), albeit often in the same representations.
- 2.35 Specific references were made to the potential for cumulative effects as a result of numerous sites coming forward in the near future and, leaving aside traffic issues (which are referred to above) these comments tend to focus on ‘in-principle’ concerns about multiple major development proposals across different sites but which are relatively close together in this part of Cherwell District, and the likelihood of this resulting in change and adverse effects on the area as a whole. Specific reference is made to other specific schemes including planned (allocated) and/or consented housing development around Bicester and at Heyford Park, plus significant additional unallocated residential development proposed at Heyford Park, the Puy du Fou leisure proposals (east of the M40),

and other distribution warehousing (B8) proposals close to Junction 10 which are currently subject to a planning appeal against refusal.

- 2.36 Some representations include specific concerns about cumulative noise and lighting disturbance from these and other sites, as well as the cumulative landscape and visual effects given the greenfield nature of numerous other planned or proposed developments in addition to OxSRFI.
- 2.37 In the ES the Applicant has undertaken a cumulative impact assessment as part of each ES topic which considers the cumulative impacts of an extensive list of planned, committed and proposed development in the vicinity of the Main Site, including relevant emerging but not yet determined or committed proposals. The list of sites was informed by discussions with the local planning authority, as explained in ES Chapter 1 (Introduction) (Document 6.1/[APP-169](#)). ES Chapter 16 (Cumulative Effects) (Document 6.16/[APP-184](#)) summarises the assessment undertaken, and conclusions reached, for both construction and operational phases. Few significant cumulative environmental effects are identified in the ES, but the assessment acknowledges the inevitable effects and change to the local landscape as a result of numerous developments relatively close together and which share some ‘receptors’ or visible from the same viewpoints. However, the assessment also identifies the varied nature of the likely landscape and visual effects in part due to the relatively limited or lack of intervisibility of the OxSRFI proposals with a number of other committed or proposed schemes. At the localised level, some significant adverse landscape and visual effects are considered likely cumulatively from OxSRFI with the proposed ‘new town’ at Heyford Park.
- 2.38 The ES assessments of noise and air quality utilise data from the Transport Assessment which itself is cumulative (and considers all planned and committed growth across a wide study area), and identify no significant likely residual effects.
- 2.39 Representations received on this issue include the following:

Relevant Rep Reference	Name
RR-002	Al Grenfell
RR-004	Amanda Goodger
RR-007	Andrew Hickman
RR-012	Athiswari Vadivale
RR-013	Benjamin Branch
RR-028	Chris Lane
RR-030	Dan Harris
RR-038	Elizabeth Wilson
RR-040	Emma Sweetland
RR-044	Florence Douglas
RR-048	Geoffrey Johnston
RR-063	James Westbrook
RR-064	Jamie Whitfield
RR-066	Jane Rosetta Jana

Relevant Rep Reference	Name
RR-072	Juliet Cornford
RR-073	Katherine Harris
RR-102	Nicholas John Wilkins
RR-105	Nicky Elliott
RR-118	Rebecca Siena Parker
RR-119	Richard Allen
RR-122	Ruth Corkin
RR-123	Sally Munnings
RR-125	Samantha Rollinson
RR-137	Thomas Evans
RR-144	Vasile Sabau

PFAS Contamination

- 2.40 This issue has not been raised by a significant number of RRs, but is known to be of some concern to some local groups and individuals. It represents a relatively new environmental issue which is increasingly common in many locations, and has also been raised by some statutory consultees as reported in Part 1 of this document.
- 2.41 The Applicants responses to queries about PFAS are set out in Part 1 of this document in response to representations including those from Cherwell District Council (RR-024), several local Parish Councils, and both Heyford Park Community Action Group (RR-056) and the Gallos Brook Campaign (RR-045).
- 2.42 In summary, the investigations undertaken by the Applicant on the OxSRFI site show PFAS is present in some watercourses and associated sediments, and to lesser extent groundwater, on-site. The data gathered by the Applicant (post-submission of the Application) has recorded PFAS in locations which strongly suggest that, like the results from work by the GBC (and data produced by the Environment Agency), historic activities on the former RAF Upper Heyford airbase are the source of this contamination. However, the results also show that the levels or concentrations of PFAS in the tributaries of the Gagle Brook located within the OxSRFI site are considerably lower than those seen in the Gallos Brook (which suggest it has a more direct 'pathway' link and relationship to the former Airbase). Similarly, the investigations undertaken by the Applicant show the levels in the groundwater are very low, with no evidence of any major accumulations on-site.
- 2.43 A range of standard risk-based assessment, evaluation and verification methods already allowed for in the Construction Environmental Management Plan (CEMP) will apply equally to PFAS as any other form of contamination encountered on-site. However, the Applicant intends to update the CEMP to ensure it makes any specific references required as a result of the presence of PFAS in parts of the Site.
- 2.44 Representations received on this issue include the following:

Relevant Rep Reference	Name
RR-018	Bushra Mayet
RR-022	Charlie Henry
RR-023	Charlotte Harris
RR-038	Elizabeth Wilson
RR-040	Emma Sweetland
RR-054	Helen Christie
RR-055	Henriette van der Blom
RR-064	Jamie Whitfield
RR-066	Jane Rosetta Jana
RR-083	Louise Holder
RR-114	Philip Norstrand
RR-138	Tim Henderson

Scale and/or inappropriate location (incl. alternative sites), including landscape and visual concerns

- 2.45 Linked in many ways to other related issues or comments made regarding potential effects on local amenity and with some overlap with comments made about environmental effects more generally, a number of representations specifically question or comment on the proposed scale of development. This is often linked to observations regarding the current (agricultural) use of the site and its current character which will clearly be fundamentally altered by the proposed development. Some of the representations refer specifically to seeking clarification on the justification for the proposed total floorspace (603,870 sq.m/approx. 6.5m sq.ft), while others make more general comments about the scale (size) of buildings which could be delivered on the site. In some cases this explicitly includes reference to the likely impact with reference to ‘landscape change’ or ‘change to local character’ as a result of the proposed development, or reference to the visual impact of new large buildings and new infrastructure being introduced.
- 2.46 A small number of these representations query whether there is need for the scale of development proposed. A number of representations suggest there must be other alternative sites which respondents consider would be more appropriate places to accommodate the proposed development. This included at least one representation suggesting there are suitable brownfield alternatives which could accommodate the development (including the former RAF Upper Heyford site).
- 2.47 The Applicant’s responses to representations from Cherwell District Council (RR-024), Oxfordshire County Council (RR-109), and Calum Miller MP, as well as the Heyford Park Community Action Group (RR-056) also address similar issues.
- 2.48 The proposed scale of development and the type and nature of the mitigation proposed is considered proportionate and appropriate, and is informed by the LVIA work. The results of the LVIA demonstrate the likely effectiveness of the

embedded mitigation and design response to the site in minimising the potential residual effects. The extensive Green Infrastructure context provided for the proposed built development – which brings other benefits in terms of supporting public access, active travel, and biodiversity – forms an integral part of the mitigation through generous offsets and ‘buffers’ between the proposed development and surrounding landscape and visual receptors.

- 2.49 Some representations query the use of earthworks bunds/mounding as a key element of the mitigation proposed. The Applicant remains of the view that the approach taken is appropriate and proportionate, and notes the NPS’s recognition of the role of bunds as an appropriate (form of mitigation for potential visual and noise effects (at NPS paragraphs 5.166 and 5.240).
- 2.50 Aligned with the NPS which establishes a ‘compelling need’ for SRFIs (which by definition include rail terminals and warehousing), the Applicant’s market evidence (the Market Analysis Report (Document 7.1/[APP-311](#) is clear regarding the need for large-scale or XXL warehousing in this area. In meeting the NPSs ambition to shift the long-haul freight legs from road to rail it is necessary and logical to seek to provide for National Distribution Centres – which tend to be the largest of all distribution warehouse facilities – on SRFI sites, and to maximise the potential for rail-served logistics buildings. and the scale of the OxSRFI proposals will allow for a number of such facilities on this site. As set out in the detail of the response to CDC (RR-024) in Part 1 above, the OxSRFI proposals are of a scale similar to all other existing SRFIs in terms of total floorspace proposed, and in terms of the types and scale of buildings allowed for.
- 2.51 The Applicant’s assessment of alternative sites is set out in the ES Appendix 2.4 Alternative Sites Assessment (ASA) (Document 6.2D/[APP-190](#)). The Applicant considered a range of potential alternative locations in a search area around the M40 corridor and the ASA is clear in showing there are no better or more suitable alternative locations. With specific reference to the ‘brownfield’ Heyford Park site, it is proposed for a different mix of uses in the adopted Cherwell Local Plan and through planning permissions and is arguably more constrained by the presence of heritage assets and designations. This is explained within the ES Appendix 2.4 (Alternative Sites Assessment) (Document 6.2D/[AS-054](#)). The principle of SRFI development often needing a countryside location is also accepted by the NPS (paragraph 4.81).
- 2.52 Representations received on this issue include the following:

Relevant Rep Reference	Name
RR-002	Al Grenfell
RR-005	Amy Molyneux
RR-007	Andrew Hickman
RR-013	Benjamin Branch
RR-048	Geoffrey Johnston
RR-049	Georgia Douglas
RR-051	Grant Underwood

Relevant Rep Reference	Name
RR-052	Harrison Blake
RR-060	Ivan Ward
RR-066	Jane Rosetta Jana
RR-072	Juliet Cornford
RR-083	Louise Holder
RR-108	Osama Mayet
RR-110	Pam D Rochford
RR-113	Peter John Cavill
RR-116	Rachel Ellingham
RR-117	Rachel Vangucci
RR-120	Richard Parnell
RR-127	Sandra Wilkins
RR-139	Timothy Moore
RR-144	Vasile Sabau

Concerns about rail issues (including perceived risk of only warehousing being delivered)

- 2.52 Some Representations raise concerns or scepticism about the proposed rail terminal, with some airing concerns that the terminal will not be built at all – essentially suggesting that the proposed development will only consist of warehousing - and others suggesting even if built, the terminal will not be used. Some local people are concerned that the proposals may represent a ‘trojan horse’ for additional warehousing but with no intention to deliver an operational rail terminal, or no market interest likely even if built.
- 2.53 Others are keen to ensure that rail infrastructure and the terminal is delivered early in the construction programme to guard against being established as a road-based freight and distribution site, and comment on the proposed maximum floorspace ‘trigger’ (draft DCO Requirement 5) before the terminal is in place.
- 2.54 There are also comments regarding the suitability of the Chiltern Mainline to accommodate the proposed terminal and questions about whether the introduction of regular freight traffic will compromise existing or future passenger rail services. At least one representation suggests the scheme should help deliver additional passenger services on the London to Birmingham line at Ardley/Upper Heyford.
- 2.55 These Representations include important queries and issues which have arisen at other SRFI Examinations, and which the Applicant has been keen to discuss and address in a positive way. Discussion about the phasing of terminal construction and back-stop ‘triggers’ for provision of the operational rail terminal have featured as part of the dialogue held with a number of statutory bodies who have similarly been keen to understand the extent of the Applicant’s commitment to, and the strength of the obligations which will compel the delivery of, the Rail Terminal as well as the other elements of the proposed development.

It has also featured in dialogue with Network Rail, and they comment on the anticipated timing of their works in the agreed SoCG (Document 8.1/[AS-092](#)). The Applicant's responses to similar points are set out in Part 1 of this document including in response to the representations of Callum Miller MP (RR-020), Oxfordshire County Council (RR-109) and Philip Norstrand (RR-114).

- 2.56 The OxSRFI Market Analysis Report (Document 7.1/[APP-311](#)) includes details of the market context for rail freight including the drivers of rail freight growth (Section 5), the commercial need for an expanded network of SRFIs (Section 6), and Section 8 explains the deficiency in current SRFI provision and why OxSRFI will generate demand for rail freight which cannot currently be met. Similarly, the Rail Report (Document 7.2A/[APP-312](#)) explains the growth potential for rail freight (Section 3), and Section 4 refers to the success of other SRFIs in generating businesses new to rail through the provision of new terminal capacity which expanded the network. It also explains the significant number of SRFIs that would be required to help meet the Government's 75% target in rail freight growth. The GB Railfreight Supporting Statement (Document 7.2B/[APP-313](#)) explains why they see OxSRFI as well placed to meet demands for rail freight and refers to the success seen at iPort Doncaster and EMG to quickly generate substantial new rail freight business. The recent email received by the Applicant from Network Rail (at **Appendix D**) is also referring directly to a number of issues raised in various RRs from interested parties.
- 2.57 The Applicant also notes the recent (8th September 2026) new Government rail freight target focused on at least a 40% increase in rail freight by 2040 which is clearly directly relevant to the OxSRFI proposals and the need for additional SRFIs generally ([Great British Railways sets course for rail freight growth - GOV.UK](#)).
- 2.58 An SRFI is defined by Government as including a terminal and warehousing – both are required. Without additional terminals, the mode shift to rail will not be deliverable, but there is clear evidence that where terminal capacity is provided, the distribution and logistics market increases use of rail freight. The Applicant's programme includes construction of the terminal a part of the earliest phase of development. The DCO as proposed requires delivery of the Terminal, and for it to be capable of being operational (i.e. connected to the Chiltern Mainline) – this is secured via draft DCO Requirement 5. The DCO does seek some flexibility to enable first occupation of a proportion of warehousing (up to 232,258 sq.m.) in advance of the terminal being capable of use. This specifically guards against delays in the ability of Network Rail to deliver the connections from the new terminal to the Chiltern Line (while the terminal is constructed by the Applicant, the connections have to be delivered by Network Rail, not by the Applicant). This flexibility is clearly defined and would be secured by the DCO (draft DCO Requirement 5). The remainder of the warehousing could not be legally implemented beyond the proposed trigger without an operational terminal in place.

2.59 Enabling delivery of some warehousing before the rail connections are in place, and securing this by requirements - is explicitly acknowledged as an appropriate and acceptable approach by the NPS (at paragraph 4.88).

2.60 Representations received on this issue include the following:

Relevant Rep Reference	Name
RR-002	Al Grenfell
RR-004	Amanda Goodger
RR-007	Andrew Hickman
RR-026	Chris D’Este-Hoare
RR-030	Dan Harris
RR-055	Henriette van der Blom
RR-068	Jean Conway
RR-172	Juliet Cornford
RR-075 & RR-076	Keith Donald Kenneth Murray
RR-090	Mark Ellis
RR-102	Nicholas John Wilkins
RR-112	Peter Deeley
RR-113	Peter John Cavill
RR-114	Philip Norstrand
RR-116	Rachel Ellingham
RR-119	Richard Allen
RR-127	Sandra Wilkins
RR-137	Thomas Evans
RR-139	Timothy Moore

Effects on a future Ardley passenger Rail Station (including general suitability of the Chiltern Main Line (capacity and gauging))

2.61 Linked to rail issues, a small number refer to the interactions between OxSRFI and a future potential new Ardley passenger Station. These raise a number of issues, including concerns that OxSRFI may prevent or prejudice delivery of a Station, with others suggesting (or assuming) that a new passenger Station should form part of the OxSRFI scheme.

2.62 The Applicant is in ongoing, constructive dialogue with OCC and CDC regarding local aspirations and activity to investigate the feasibility of a new station, and OxSRFI’s relationship with a potential location for a new Station south of Ardley, and has also discussed with Chiltern Railways. The Applicant is exploring potential Statements of Common Ground on this issue. The Applicant has also discussed and/or responded to comments from other interested parties who are supportive of the principle of a potential new Station being delivered in due course, including Calum Miller MP.

2.63 The Applicant’s responses to these issues are set out in Part 1 of this Report, with details included in the responses to those bodies referred to above. In

brief, the Passenger Rail Station Note (Document 5.4C, [AS-050](#)) confirms that OxSRFI would not prejudice the delivery of a future passenger Station and indeed could potentially help enable delivery or reduce future infrastructure works and costs for those bodies who would bring it forward in due course. Positive dialogue has been held with numerous bodies regarding the possible interactions between OxSRFI and delivery of a new future Station – it is hoped this will form part of emerging SoCGs with OCC and CDC. The Applicant has been in dialogue with Network Rail since 2019, and an agreed Statement of Common Ground (SoCG) with them ([AS-092](#)) sets out their positive position following that extensive dialogue and collaborative working. This confirms that NR’s position is that OxSRFI would not prejudice a new Station if brought forward on the site of the former Station south of Ardley.

- 2.64 The technical queries raised by a small number of respondents refer to rail capacity or gauging on the Chiltern Mainline. These key issues have been considered in some detail in establishing the feasibility of this as a location for an SRFI. Contrary to some comments made, the Mainline has regularly been used by freight traffic for some time, and does form part of the national Rail Freight Network. The Applicant has submitted various reports regarding the rail infrastructure context for the OxSRFI proposals and these directly address issues of capacity and gauging – see the Rail Report ([APP-312](#)), and the reports submitted by GBRailfreight who intends to operate the terminal, including their Rail Freight Capacity Report ([APP-314](#)).
- 2.65 With regard to wider issues regarding the Chiltern Mainline (including pathing, gauging and overall capacity), the Applicant’s dialogue with Network Rail and SoCG referred to above is directly relevant, as is the emerging SoCG with Chiltern Railways, which is expected to include a clear position regarding interactions with current and future passenger services. The Statement of Common Ground with Network Rail includes, as an Appendix, an explanation as to how the freight pathing process works. This explains how freight paths are allocated alongside passenger service paths and how Network Rail works to accommodate both passenger and freight growth.
- 2.66 Representations received on this issue include the following:

Relevant Rep Reference	Name
RR-007	Andrew Hickman
RR-026	Chris D’Este-Hoare
RR-028	Chris Lane
RR-055	Henriette van der Blom
RR-066	Jane Rosetta Jana
RR-072	Juliet Cornford
RR-114	Philip Norstrand
RR-137	Thomas Evans

Economic and labour market issues (including regarding the type of jobs created, economic need for the proposals, and local benefits)

- 2.67 A relatively small number of representations have questioned whether there is an economic need for the proposals in this location, either with regard to perceptions that it is not a ‘strategic’ location (also see above responses regarding suitability of the Chiltern Line) or with a focus on local labour market issues and questions about the type or quality of jobs to be created by the OxSRFI scheme. There is some similarity with a number of comments or suggestions raised regarding there being alternative locations which may be more appropriate (which is addressed above).
- 2.68 The Applicant has given due consideration to the local ‘socio-economic’ characteristics and context through the ES (Chapter 12, Document 6.12, [APP-180](#)). In addition, the Applicant’s strategic case in support of the Proposed Development and the location is set out in the Planning Statement (Document 5.4/[APP-161](#)), and the Market Analysis Report (Document 7.1/[APP-311](#)), supported by the GBRailfreight Supporting Statement (Document 7.2B/ [APP-313](#)).
- 2.69 Responses in Part 1 of this document to representations from Cherwell District Council and Calum Miller MP include responses to some of these same issues.
- 2.70 The NPS explicitly and clearly establishes that there is a “*compelling need*” for additional SRFIs and that national policy is to expand the network of SRFIs. The further market evidence submitted by the Applicant confirming that there is a recognised need for strategic logistics in this part of the M40. The Applicant’s position, based on this evidence, is that OxSRFI will help to meet the needs of a market area currently poorly served by SRFIs. The important role performed by the logistics sector in almost every other economic sector also forms part of the wider employment and economic benefits of OxSRFI as an SRFI. Recognition of the importance of the freight and logistics sector has been enhanced in the recently updated National Planning Policy Framework (NPPF) which is a material consideration for consideration and determination of OxSRFI.
- 2.71 There can be little doubt that the OxSRFI scheme would generate significant economic benefits, including significant new job creation and local economic activity and growth (GVA, (gross value added)). At least one of the representations on this issue incorrectly refers to a potential 15,000 new jobs created – the estimated employment from OxSRFI is approximately 9,600 (gross) once fully occupied (based on standard employment density assumptions) as set out in ES Chapter 12 (Document 6.12/[APP-180](#)). Other economic benefits include the significant investment in local highways infrastructure and public transport improvements. Section 6 of the Planning Statement includes a summary of the overall benefits of the proposals.
- 2.72 While unemployment in the Cherwell focused study area used for the socio-economic assessment is acknowledged as being low, the levels of out-commuting are known to be relatively high. Further job creation through proposals such as OxSRFI will reduce the need for travel to jobs further afield, and help meet the need for employment associated with significant planned

additional housing growth. ES Chapter 12 (referred to above) provides information about the typical skills and job-type profiles seen in the distribution and logistics sector, and describes the increasing shift towards a higher proportion of skilled and technical roles, in part associated with the increased adoption of high-tech supply chain management systems and/or automation within many modern distribution buildings.

2.73 With regards to comments concerning labour supply and benefits for the local economy, the representation from Cherwell District Council (RR-024) – and the Applicant’s response – focus on the opportunities for training and skills initiatives to maximise local benefits. Measures focused on local training are proposed and would be secured by draft Development Consent Order Requirement 31 (Employment Scheme) (Document 3.1/**APP-139**) requires an employment scheme during both the construction and operational phases of the development to be submitted to the local planning authority for approval. Issues covering training and capturing benefits for local residents would form part of these schemes.

2.74 Representations received on this issue include the following:

Relevant Rep Reference	Name
RR-002	Al Grenfell
RR-007	Andrew Hickman
RR-023	Charlotte Harris
RR-040	Emma Sweetland
RR-048	Geoffrey Johnston
RR-072	Juliet Cornford
RR-104	Nick (<i>no surname</i>)
RR-119	Richard Allen

Support for OxSRFI

2.75 It is clear from the Representations received that many local people support the principle of delivering new SRFIs as way to enable more freight to be moved from road to rail, or that some welcome the job creation or investment in new infrastructure. However, many representations which include this support for the principle of an SRFI, or for a particular element of the likely benefits of OxSRFI, go on to raise questions or concerns which make it clear their representations are not intended to be interpreted as wholly supportive, or include reasons why they currently object to OxSRFI. However, a small number of representations only express support for the proposals, either with emphasis on the wider environmental benefits it would deliver from mode shift, or on the economic benefits and investment in improved local road infrastructure it would deliver.

2.76 Representations solely expressing support include the following, in addition to RR-086 referred to above in Part 1B of this report:

Relevant Rep Reference	Name
RR-021	Caroline Ryan
RR-071	John Mwangi Njeri Kibui
RR-092	Martin Pedel

Miscellaneous/Other

- 2.77 A very small number of Representations include very brief comments or single sentences which do not fit easily under any of the themes identified above. For example, one simply states that the respondent ‘*wants to be informed and submit further comments*’. Others only state that they do not agree with the proposals, or that they consider they have some relevant expertise (but go on to make no further or detailed comments).
- 2.78 The Applicant has had due regard to these as all Representations, but no specific response to these themes is possible given the nature of them. Representations considered to be in this category include the following:

Relevant Rep Reference	Name
RR-059	Irina Vosloboinikova
RR-082	Louise Hefferman
RR-088	Marcus Kemp
RR-103	Nicholas Smailes
RR-135	Tariq Maye