OXFORDSHIRE
STRATEGIC RAIL FREIGHT INTERCHANGE

Applicant's Responses to the CDC / EA / OCC Relevant Representations (Appendix B)

Document 9.1B
Revision -

On behalf of
Oxfordshire Railfreight Limited

Prepared by Oxalis Planning
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The summary and Applicants response within this Appendix are in the following order:

- Cherwell District Council (CDC) – RR-024
- Environment Agency (EA) – RR-042
- Oxfordshire County Council (OCC) – RR-109

OxSRFI – Applicant's Comments on Relevant Representations
Document 9.1B – CDC Comments (RR-024) – Appendix B

The Table below provides a summary of the Relevant Representations (RR-024) made by Cherwell District Council and the Applicants response to the issues raised. This has been separated from the main schedule given its length, and with the intention of it being more easily reviewed by the ExA and other parties.

The RR covers multiple issues and topics (across most ES chapter topics), as well as comments regarding wording and content of the draft DCO. It is comprehensive, extending over approx. 52 pages on various ES related topics alone. The RR sets out 'principal issues' which are suggested as an appropriate focus for Examination. The principal issues are summarised in the table below with key points under each of the ES chapter headings, with a response to the draft DCO within Document 9.1A.

Summary of Representation	Applicant Response
1. **Introduction** – in relation to the Finch case, the Council is of the view that wider consideration should be given to wider additional environmental harms, or benefits, that may arise by this proposal that would not otherwise occur if this scheme were not to go ahead or would appear elsewhere or in a different form. It is considered some narrative on the nature and potential quantum of impact that may arrive under the two different scenarios may be of assistance in terms of balancing material consideration for or against the proposal.	The Applicant welcomes the clear indications that CDC supports the principle of the proposed development as potentially forming an important component of the national infrastructure framework, and also that the Council welcomes the economic benefits the scheme would deliver. A response to points under each heading is taken in turn below. **1. Introduction** – the Applicant considers the ES has assessed the impacts appropriately including appropriate regard to Finch. Please refer to paragraphs 1.3.5-1.3.7 of ES Chapter 1 (Introduction) (Document 6.1/**APP-169**). **2. Description of Development and Alternatives** – the Applicant welcomes the Council accepting that there is an absence of SRFI provision along the M40 corridor. The justification for the methodology and approach to the search area around the M40 corridor is provided within the Alternative Sites Assessment (ASA) (Document 6.2D/**AS-054**), particularly in Section 3 of that document. Paragraph 3.100 of the NPS states that "*a network of SRFIs is needed across a broad range of regions, to serve regional, sub-regional and cross-regional markets*" and adds in paragraph 3.103 that "*there is a compelling need for an expanded network of SRFIs throughout the country*". On this basis, the

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2. **Description of Development and Alternatives** – the Council accepts that there is an absence of provision along the M40 corridor. The Council also considers the M4 corridor, which is outside the search area identified by the applicants, is an additional area which also lacks SRFI provision and reduces weight to be attached to the M40 corridor. 3. **Transport** – this topic is dealt with by OCC. 4. **Air Quality and Odour** – in relation to the removal of the IVCF from the site, CDC state there is significant potential for adverse harm at unacceptable levels to occur during the physical works on site during the de-commissioning stage if the works aren't adequately controlled. With regards to the removal of the landfill, the proposed methodology is welcomed and the Council would wish to be involved in signing off any operational strategy and be notified in advance of any works proceeding. 5. **Noise** and Vibration – in relation to the proposed s106 mitigation measure for noise impacts to	ASA acknowledges that there are "substantial gaps" in the existing national network along the M40 corridor between London and Birmingham, particularly the southern end of this corridor around Oxford (ASA paragraph 3.6). In view of the NPS, evidence provided within the ASA, and on the basis that Oxfordshire is one of several substantial gaps in the national network, the Applicant does not consider that the weight attributed to the M40 corridor should be reduced. **3.Transport** – Noted. The Applicant continues to engage constructively with OCC on highways and transport matters (see RR-109). **4. Air Quality and Odour** – the Applicant acknowledges CDC's welcome of the proposed methodology to remove the landfill waste. Draft Requirement 27 of the DCO (Document 3.1/**APP-139**) states that "*the landfill works must not commence until a detailed odour management plan has been submitted to and agreed in writing with the local planning authority*". Any potential for adverse harm during decommissioning of the IVCF would be effectively minimised by the detailed decommissioning process. Appropriate management of environmental effects from decommissioning is an explicit requirement of the Environmental Permitting regulatory process, which applies to the IVCF. In this context, any such emissions are unlikely to be more significant than during the IVCF's operation. As such, adequate control should be readily achieved through typical, good practice measures. **5. Noise and Vibration** – CDC did not provide comment to the Applicant on the drafting of the noise mitigation provisions, which were provided to CDC in March as a first draft upon which discussion was (and remains) welcome. As at the time of writing, the Applicant still awaits receipt of revised drafting proposals from CDC on the s106 provisions. The current draft s106 does not require the Council to ensure the payment made to property owners is used to install the required mitigation (see Schedule 3 Document 3.4/**APP-142**). The mitigation is the offer of the payment. **6. Ecology including Arboriculture** - • *Otter plans* - the Applicant is making updates to the submitted Ecological Appraisal Report (Document 6.6A/**AS-068**) which will include a plan that identifies habitats included within the otter surveys undertaken. The updated report will be provided as set out in the Cover Letter for Procedural Deadline A.

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residential properties along Middleton Stoney Road, the Council consider there should be an alternative arrangement where the Applicant takes a lead role instead of the Council in allocating monies to occupiers. 6. **Ecology including Arboriculture** – the Council raises several issues which this chapter and appendices, which include: • CEMP – lack of plans for Otter surveys • SSSI – there is no standalone strategy for mitigation of the impacts to the SSSI (there is some detail in the HMMP but a standalone scheme is still required) • Ancient Woodland – whilst there is some consideration of indirect effects on air pollution on ancient woodland, other recognised indirect effects have not been properly considered (i.e., severance of Burntclose Copse). • Bats – further evidence is sought against the use of hop overs is made available as this is a generally accepted method of ameliorating the impacts of	• *SSSI* – The HMMP (Document 6.6K/**AS-075**) will be updated to separate out the strategy for mitigation for impacts to the SSSI from the remainder of the proposals. The updated report will be provided as set out in the Cover Letter for Procedural Deadline A. • *Ancient Woodland* – The Applicant is updating ES Chapter 6 (Ecology including Arboriculture) (Document 6.6/**APP-174**) to include further consideration of any potential indirect effects on ancient woodland receptors, including the effects of severance of the Burntclose Copse woodland corridor that links to offsite Ancient Woodland. The updated ES Chapter will be provided as set out in the Cover Letter for Procedural Deadline A. • *Bats* – correspondence received from Natural England will be appended to the Bat Survey Report, (as set out in the Cover Letter for Procedural Deadline A) and confirms the appropriateness of avoiding the use of hop-over trees in circumstances such as the MSRR 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. • *Lighting* – full isolux contour diagrams will be produced at the detailed design stage (in accordance with draft DCO Requirement 16). The lighting strategy will be undertaken in accordance with relevant industry guidance (ILP, 2026) and best practice to avoid or otherwise minimise potential impacts to nocturnal wildlife due to artificial lighting. The detailed lighting strategy will specifically be designed to avoid any increase in baseline lighting levels across habitats that support bat flightpaths and foraging behaviour or are considered suitable to do so. • *Farmland birds* – Figure 12 of the BNG Assessment (Document 6.6I.01/**AS-072**) identifies areas proposed for long term bird mitigation. The farmland bird strategy will be updated to clarify the long-term enhancements that will be provided in terms of suitable nesting opportunities for ground-nesting birds and a year-round forage resource. The updated report will be provided as set out in the Cover Letter for Procedural Deadline A. • *BNG* (Documents 6.6I.01 and 6.6I.02/**AS-072** and **AS-073**)/Draft HMMP (Document 6.6K/**AS-075**) - the metric for the SSSI area and corresponding mitigation areas in the submitted documents are predicted to achieve above a 10% net gain in hedgerow units. • *Draft HMMP* (Document 6.6K/**AS-075**) *and soil analysis* – additional post-submission soil analysis has been undertaken by the Applicant across the northwesternmost field compartments and will be submitted. This analysis will demonstrate that the underlying soils within these three field compartments proposed for species-rich grassland creation (lowland meadow and calcareous

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vegetation fragmentation by roads. • Lighting – further details on bats and farmland birds. • BNG/HMMP – clarity with figures between the metric and assessment. Also see comments on veteran trees. • Arboriculture – review of tree surveys in relation to clarity on the number of veteran trees on site and how this impacts on the BNG/HMMP, including the loss of veteran trees not previously identified. Further consideration also of Ancient Woodlands and review of RPAs. 7. **Landscape and Visual** Impact Assessment – several comments are raised in relation to the following points: • Methodology of the LVIA including a response to the Scoping Opinion, previous CDC comments, omission of field survey records, legibility of how the methodology is set out, ZTVs, with resulting inconsistencies in the conclusion. • Scale of development would result in adverse effects on the receiving landscape character, both directly and indirectly.	grassland) are predominantly calcareous in nature with low phosphate availability and moderate/moderately low levels of organic matter. The soil nutrient conditions of all three field compartments are considered well suited to the establishment of species-rich grassland, with no requirement for a delayed start date considered necessary within the BNG metric. Arboriculture – the following response is provided to the detailed points raised. This is consistent with a fuller response provided to OCC/CDC as part of ongoing dialogue following their comments on the Arboricultural Assessment (and BNG assessment): • *Need to update the tree survey* – as set out in the Arboricultural Assessment (Document 6.6H/APP-241) an updated survey was carried in 2025 which focused on the condition of the trees with stem diameters and crown spreads being broadly consistent with the information collected in 2020 and 2021. The Arboricultural Assessment has presented what is considered by the Applicant to be a fair representation of the tree constraints including Root Protection Areas of trees on site which allows for an assessment of likely impacts as a result of the development proposals which are considered reasonable and proportionate. • *Definition of trees as veteran* – in addition to T170, T93 is also accepted by the Applicant to be a veteran tree under NPS Guidance and it will be removed as part of the OxSRFI scheme due to its location within the Main Site development zone. The classification of T150 and T152 as potential veteran trees makes no difference as both trees are to be retained in significant areas of green space. • *Justification for removal of T93* – when considering what would constitute 'wholly exceptional reasons' for the loss of a veteran tree, footnote 62 of the latest (2026) NPPF Section N6 Paragraph 2 states that *"For example, infrastructure projects (including nationally significant infrastructure projects, orders under the Transport and Works Act and hybrid bills), where the public benefit would clearly outweigh the loss or deterioration of the relevant habitats."* (This NPPF replaces, but is consistent with, the previous NPPF footnote 70). The OxSRFI scheme is a nationally significant infrastructure project, and the loss of this veteran tree can be justified subject to providing a suitable compensation strategy. • *Compensation for loss of T93 in the BNG Assessment* – the Applicant agrees that a suitable compensation strategy is necessary for the loss of T93. There is ample opportunity within the OxSRFI scheme to deliver a bespoke mitigation package to also satisfy the BNG Assessment. • *Loss of BNG Veteran Trees requires further assessment and compensation* – A large proportion of these BNG veterans are dead trees or trees in significant decline with large pieces of deadwood.

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• Residual impacts on character would remain significant.
• Further justification of earth mounding.
  • Provide photomontages based on the maximum design parameters instead of the illustrative masterplan.
  • Update the LVIA so that it adequately factors in tranquillity, rurality and dark skies
 	
Comments have also been provided on the design documents and illustrative layout of the scheme including the Central Hub, with recommendations made for the detailed design. It should be noted that there is general support from the Council for the general masterplan arrangement and coding principles.
 	
8. **Lighting** – there are comments relating to three broad areas of lighting for consideration:
  • Rail Terminal – clarity as to the height of the lighting masts and further details on the lighting of the terminal (including gantry cranes) during construction and operation.
  • Buildings – appropriate assessment undertaken, with
	Bespoke mitigation could include the translocation of this deadwood habitat to an agreed receptor area or areas within the Application Site to create a dead wood reserve. An appropriate location would be adjacent to the Gagle Brook woodland corridor that is contiguous with the off-site Burntclose Copse ASNW. It is furthermore considered that the extensive tree planting proposed will provide a significant enhancement of the onsite tree resource to compensate these losses.
	• *Failure to identify BNG trees – BNG veteran trees will be identified within the updated metric. As these trees are categorised as irreplaceable habitat they will not contribute towards the proxy baseline values created for the baseline or post-development assessment in the metric. Unavoidable loss or deterioration of irreplaceable habitat will instead be mitigated via a bespoke on-site compensation package detailed within a site-specific Veteran Tree Strategy. The HMMP will additionally be updated to reference this bespoke compensation package, with specific provisions detailed by which this will be delivered on-site. The Veteran Tree Strategy will furthermore be appended to the CEMP, with specific provisions detailed within relevant sections.*
	• *Expansion of buffer zone for Kennel Copse and Burntclose Copse (Ancient Woodland) from 15m to 30m* – Kennel Copse is shown to be located within an area of green space with the proposals identifying no impacts which are likely to extend beyond the standard 15m distance and as such there is no evidence to suggest that a precautionary 30m buffer should be provided or would provide further protection against any potential adverse impacts. Burntclose Copse has been provided a 15m buffer on the relevant Tree and Hedgerow Retention and Removal Plans (Documents 2.15G/**APP-131** and 2.15H/**APP-132**) demonstrating that this buffer zone would be fully respected by development within an area of green space. While a small stream identified as Gagle Brook flows through the ancient woodland stand within Burntclose Copse the lead project Hydrologist has confirmed that post-development flows into Gagle Brook will be limited to greenfield rates and the proposed works would not impact flows within neighbouring sections of the Padbury Brook tributary, ensuring continuity of the existing hydrological regime within this section of Ancient Woodland.
	
	In view of the above Arboricultural comments, the Applicant is updating the following documents as set out in the Cover Letter for Procedural Deadline A:
	• All Tree and Hedgerow Retention and Removal Plans – Document Series 2.14 (A-J) (**APP-124**/**APP-125**/**APP-126**/**APP-127**/**APP-128**/**APP-129**/**APP-130**/**APP-131**/**APP-132**/ **APP-133**/ **APP-134**)
	• ES Chapter 6 (Document 6.6/**APP-174**),

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further assessment at the detailed design. • Highways – a matter for the Local Highways Authority. 9. **Water** Environment – comments focus on the principles and recommendations, with detailed design to follow in due course. No objections to the proposals are set out. Comments to be read alongside OCC comments (RR-109). 10. **Heritage** – Built and Archaeology – the Council recognises amendments to the proposals at the Stage 2 consultation to reduce the height of the bund to the north-west alongside the RAF Upper Heyford runway in consultation with Historic England, with any further comments deferred to Historic England. The works to restore the listed barn (and other associated historic buildings, such as Ashgrove Cottages) and return to use are welcomed and not considered to harm its significance. However further consideration should be given to the relationship of the listed barn, its boundaries and	• Ecological Appraisal Report (Document 6.6A/**AS-068**) • Bird Survey Report (Document 6.6E/**APP-238**) • Bat Survey Report (Document 6.6C/**AS-069**) • Arboricultural Assessment, (Document 6.6H/**APP-241**) • Biodiversity Net Gain Assessment (Document 6.6I.01/**AS-072**) • Statutory Metric Calculation Tool (Document 6.6I.02/**AS-073**) • Habitat Management and Monitoring Plan (HMMP) (Document 6.6K/**AS-075**). **7. Landscape and Visual Impact Assessment** – OCC and Cherwell District Council have jointly responded on landscape and visual issues. The pragmatic recognition by CDC that developments of this scale will inherently cause some effects on the existing landscape is welcome, but the ongoing concerns and queries are noted, and dialogue regarding these issues is ongoing at the time of the Applicant's Comments on the RR. The submitted LVIA follows an established methodology, based upon the Guidelines for Landscape and Visual Impact Assessment (3rd Edition) (GLVIA3) and is used consistently by FPCR and which has been found acceptable and appropriate as part of the ESs for several other NSIP SRFIs and numerous major development applications and Planning appeals across the UK. The LVIA provides a robust assessment of the likely effects of the proposed development and identifies some likely residual significant effects on local landscape character and for some visual receptors. The proposed embedded mitigation and design response includes variations in built development parameters (max. heights) across the site as a direct response to landscape and visual effects, as well as extensive landscaping and earthworks to contain and reduce visibility of buildings and activity within the site. 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. The Applicant notes the NPS's express recognition of the use of bunds (at paragraphs 5.166 and 5.240) as an appropriate form of mitigation for potential visual and noise effects.

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setting within the wider site which will currently result in some harm to the significance of the listed barn. Archaeology is to be dealt with by OCC. 11. **Ground Conditions** – the ES Chapter and assessment is considered robust. However, a new issue relating to PFAS chemicals have been recorded in some of the surrounding water courses, with the full impacts of these readings still under investigation. The Council is not identifying the Application Site as an origin point of the chemicals but more part of a wider examination of impacts from PFAS. A further assessment of this issue should therefore be undertaken. Further work to the Ardley Landfill can be managed through requirements. 12. **Socio-economics including Health** – the delivery of jobs from the scheme is welcomed and the Council supports the principle of the proposed development as potentially forming an important component of the national infrastructure framework, however the Council considers that further	The RR repeats requests for additional information already made – and agreed to - during dialogue with the Applicant. In advance of the RR the Applicant shared additional information requested by OCC and CDC including additional ZTVs and wire-frame visual images to further aid their understanding of the potential 'worst-case' and to help inform its position regarding the proposals. Further additional information is being progressed by the Applicant in response to the requests by CDC and OCC, including additional photomontage images from key viewpoints (including night-time), additional cross-section details around the terminal area, and laying additional heritage information onto ZTVs. These will be shared when completed, which the Applicant anticipates should be possible at Deadline 2. **8. Lighting** – the Applicant welcomes the acceptance of the methodology for ES Chapter 8 (Lighting) (Document 6.8/**APP-176**). The Applicant welcomes agreement from CDC of the surveys, the findings of those surveys and the environmental zone for the assessment of effects being E2, as set out in the Lighting Baseline Assessment (Document 6.8B/**APP-257**). The Applicant also welcomes CDC acknowledging that in terms of the proposed buildings, an appropriate consideration of the local environment and the potential impacts has been undertaken. In response to the comments made by CDC, the following points are provided below: • *Heights of lighting columns in the rail terminal* – CDC highlight 25m tall lighting columns for the Hinckley SRFI (a refused DCO application) as a reference point as to what may be forth coming at the requirement stage for OxSRFI (see paragraph 3.8.10). This comparison is not relevant. The Outline Lighting Strategy (Document 6.8A/**APP-256**) includes maximum stated heights for loading and unloading areas within the rail terminal (within Table 7) as having an 18m maximum mounting height. • *Rail terminal lighting and British standards* – the Applicants considers that a reasonable lighting design will conformably be able to achieve illuminance levels detailed within BS EN 12464-2:2024 using lighting columns and wall/feature mounted lighting which would not exceed the above stated maximum heights. • *Illumination of the rail terminal* – the Applicant submitted an indicative light spill diagram of the Railyard at Section 2.2 of the Indicative Light Spill Diagrams (Document 6.8E/**APP-260**). • *Buildings* – the detailed design of the buildings, which includes lighting, will be secured by the DCO through requirements (in particular Requirements 9 (Detailed Design) and 16 (Lighting Details) of the Draft development consent order (Document 3.1/**APP-139**) which require approval by the local planning authority.

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justification is required on the scale of the associated logistics development given the environmental harm that will arise. Based on the market research provided, the Council accepts that there is a demand from operators for space in the vicinity of the application site but questions whether this space needs to be met along the M40 corridor. The DCO should secure logistics education and training and the s106 should secure social benefits proposed within the scheme. 13. **Materials and Waste** – to be dealt with by OCC. 14. **Soil Resources and Agricultural Land** – the scheme results in the loss of best and most versatile land, and the Applicant does not identify any embedded mitigation to reduce the impact of the scheme by moving built development away where possible. The Council is concerned that the mitigation hierarchy has not been applied in relation to agricultural land which has resulted in a significant adverse impact both locally and cumulatively resulting in a significant loss of agricultural land at a regional	• *Highways lighting* – it should be noted that drawings in the Highways Lighting Design (Document 6.8G/**APP-262**), already show a very careful and limited approach to the highways lighting. **9. Water Environment** – the submitted detail (in particular ES Chapter 9 (Document 6.9/**APP-177**), and Documents 6.9B, 6.9C and 6.9D (**AS-076** / **AS-077** / **AS-078**) demonstrates how the OxSRFI scheme will implement measures, such as SUDs, to manage surface water run-off and therefore not result in any significant environmental effects or adverse changes to flood-risk within the Application Site, or off-site. Indeed, some likely benefits (slight or moderate) are identified for downstream receptors in terms of reduced risk of flood-risk by reductions in the rate of surface water discharge from the site during storm events. Proposed surface water attenuation and drainage features form part of the extensive green infrastructure and landscaping proposed within the scheme, and in many cases will contribute to both biodiversity as well as amenity benefits for employees and visitors to the site. This multi-purpose approach accords fully with the NPS which encourages the use of SuDS, as well as 'nature-based solutions' to climate change adaptation and mitigation. It should also be noted that Requirement 21 (Flood Risk and Surface Water Drainage) of the Draft development consent order (Document 3.1/**APP-139**) will require approval of the surface water scheme by the lead local flood authority prior to commencement of each component on the Main Site. **10. Heritage** – the Applicant welcomes acknowledgment by CDC of changes made to the Parameters Plan (Document 2.5/**AS-008**) in response to discussions with Historic England. The Applicant welcomes the statement from CDC that the RAF Upper Heyford Conservation Area would not be harmed by the OxSRFI scheme. The Applicant acknowledges CDC welcoming the works to repair, retain and restore the Listed Barn, and the proposed restoration of the Listed Barn also not resulting in harm to its significance. In addition, the Applicant is pleased CDC support the retention and restoration and proposes uses of the other historic buildings (considered non-designated heritage assets), which are associated with the farm and considers these improvements to be a positive element of the proposal. Furthermore, the Applicant also acknowledges CDC welcoming the retention and reuse of Ashgrove Cottages. In terms of the wider setting to the Listed Barn and historic farm complex, ES Chapter 10 (Document 6.10/**APP-178**) considers the residual effects of the OxSRFI scheme and sets out there will be a minor adverse effect with paragraph 10.5.27 of the ES Chapter providing concluding comments.

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scale. This should be further examined. 15. **Climate Change** – there are several comments which cover the following points: Key gaps in the assessment are: • No full whole-life or whole-system carbon assessment • Heavy reliance on assumptions around renewables and grid interaction • Dominant emissions source (tenants) not effectively addressed • Limited ambition in demand reduction and energy system design • No clear linkage to net zero trajectories or carbon budgets Suggested mitigation approach includes: • Close the gap between assessment and delivery • Address unregulated emissions (largest source)	**11. Ground Conditions** – the Applicant welcomes CDC considering that ES Chapter 11 (Document 6.11/APP-179) and its associated Appendices dealing with ground contamination to be robust in terms of the methodology, the assessment of potential risks and mitigation proposed. In terms of PFAS, which has been raised in dialogue post-submission, the Applicant is aware of the PFAS agenda generally which is becoming more common and widespread, and the local context relevant to the former Heyford Air base, and understands that some other sites or locations nearby have recorded relatively high-levels. In response the Applicant has undertaken testing on the OxSRFI Main Site, and if necessary, will update the ES and other application documents, including the CEMP, to provide information both about how the Applicant proposes to remediate or manage PFAS on-site. However, based on the Applicant's work to date, there is limited PFAS impact in the watercourses and groundwater 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. **12. Socio-Economic including Health** – the Applicant acknowledges CDC welcoming the delivery of jobs from OxSRFI scheme and the CDC's support of the principle of the proposed development as potentially forming an important component of the national infrastructure framework. The Applicant also welcomes CDC acknowledging potential synergy between OxSRFI and the Heyford Park development and potential for OxSRFI to play an active part in meeting the needs of Heyford Park. Furthermore, the Applicant welcomes CDC's acknowledgment that there is a demand from operators for space in the vicinity of the Application Site. In terms of concerns relating to the scale of buildings and location of the development, paragraph 5.10 of the Planning Statement (Document 5.4/APP-161) considers the site's suitability against the requirements and policies of the NPS with clear conclusions regarding the site's appropriateness with regard to location and likely environmental effects. OxSRFI would address market requirements and expand the network of SRFI's to deliver increased access to, and opportunity for use of, rail freight services. The site is capable accommodating a strategic rail terminal (with scope for expansion of the terminal), and allows for strategic scale distribution warehousing to meet market needs. Paragraph 4.83 of the NPS also states: *"SRFIs tend to be large scale commercial operations, which are most likely to need continuous working arrangements (up to 24 hours). By necessity they involve large structures, buildings and the operation of heavy machinery".*

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• Improve certainty and resilience of the energy strategy • Extend the approach from compliance to whole-life carbon reduction 16. **Cumulative Effects** - the Council's view at the current time that until the mitigation measures proposed to accompany the main development are fully explored and their impacts to alleviate harm established, it is not possible at the current time to be certain about how much impact the SRFI project will have on the surrounding area when considered in combination with other schemes. 17. **Summary of Effects** - until such time that the value of such mitigation has been established, the Council is of the opinion that it is not possible at the current time to quantify the value to be attached to each of these matters. 18. **Additional comments** – comments on the draft DCO are summarised and responded to by the Applicant within **Appendix A**	The delivery of other SRFI's further demonstrates they are large scale in nature and that the OxSRFI scheme at approx. 6.5 million sq.ft. is consistent with other developed or approved SRFIs, such as: 1. Northampton Gateway – 5 million sq.ft; 2. West Midlands Interchange – 8 million sq.ft; 3. East Midlands Gateway – 4.5 million sq.ft, with a 2nd phase proposed (Examination closed on 10th September 2026) of a further approx. 3.5m sq.ft; 4. DIRFT (Daventry) – 14million sq.ft total (three phases), with the most recent DIRFT3 approved for 7.8 million sq.ft (781,000 sq.m.). The proposed scale of the OxSRFI development is therefore entirely in keeping with other approved SRFIs, and at a scale informed by an iterative design process alongside environmental assessments (also see the Landscape and Visual comments above). With regards to comments concerning labour supply and benefits for the local economy, and need to train local residents and capture the benefits to be delivered by the OxSRFI scheme, it should be noted that Requirement 31 (Employment Scheme) of the Draft development consent order (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. In relation to the take-up of larger units, the Market Report (Document 7.1/**APP-311**) sets out the drivers of and need for strategic rail freight interchanges and how the OxSRFI scheme will help to expand the network of SRFI's meeting the needs of the logistics sector and supporting mode shift. It also outlines the strength of demand for logistics facilities in the defined market area and explains the national trend for the growth in the demand for larger logistics warehousing which are likely to be attracted to OxSRFI. It explains that, at the time of writing, there was no available supply of XXL units (units above 46,460sqm) in the market area. **13. Materials and Waste** – Noted. The Applicant continues to engage constructively with OCC on these matters (see RR-109). **14. Soils Resources and Agricultural Land** – the parameters as set out on the Parameters Plan (Document 2.5/**AS-008**), have been prepared in response to the constraints and opportunities of the Main

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	Site, and have evolved following the Applicant undertaking detailed environmental assessments and consultation with statutory bodies and the local community. The scheme requires a comprehensive and coherent site capable of accommodating the scale and type of uses envisaged and required by the NPS. It is not feasible to factor in or amend development site boundaries to reflect the location of often relatively small pockets of a particular soil type and retain them in situ. Even if this were proposed, the small parcels would be unlikely to represent viable parcels for continued agricultural use, as implied by the comments. The proposed development will result in the loss of agricultural land and this has been assessed in ES Chapter 14 (Soil Resources and Agricultural Land) (Document 6.14/) which shows that a very small percentage (approximately 8.5%, 37.7ha) of the agricultural land affected is 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. 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, and secured by draft DCO Requirement 13. The SMPs will be phase- and site-specific to ensure protection of the resource and best re-use of soil resources, preventing damage to and loss of good quality soils. **15. Climate Change** – the Applicant disagrees with several comments on this issue on the basis that they have not correctly represented the assessment and detail provided within the application. In response the Applicant has further clarified some detailed elements of the LVIAnagement and/or energy strategy, see points below: • *The scheme results in continued significant absolute carbon emissions over its operational lifetime (paragraph 3.15.10)* – the Applicant states this is not correct, ES Chapter 15 (Climate Change) (Document 6.15/**APP-183**) concludes that while there is large absolute energy consumption arising from the operation of the scheme, when accounting for mitigation measures and within the context of national carbon budgets, decarbonisation and net zero policy, the impact of such emissions results in a minor adverse effect which is not significant. Furthermore, a conservative emissions value has been presented which is anticipated to decrease throughout the lifetime of the scheme (i.e. as a result of grid decarbonisation, increased PV provision, green leases). • *Limited evidence of construction emissions reduction beyond standard practice (paragraph 3.15.15)* – the Applicant states this is not correct, with the Carbon Management Plan (Document 6.15E/APP-305)

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	setting out a strategy to minimise GHG emissions throughout the lifetime of the scheme, including the construction phase. This is a live document that will be updated across the course of the project and additional reduction opportunities explored as the design evolves further. The Applicant does not agree with CDC's characterisation of the mitigation proposals - measures set out are considered to exceed standard best practice, particularly given the Applicant has an ambitious building emission intensity limit of 350 kgCO2e/m2. • *Dominant emissions source (tenants) not effectively addressed (paragraph 3.15.34, item 3)* – emissions arising from tenant consumption (i.e. unregulated energy) have been quantified to a high level using information available; further detail is unable to be provided at this stage given the occupiers and their activities are not yet known which is typical this DCO stage. Despite this, mitigation measures embedded within the design (i.e. solar PV and BESS) will enable emissions reductions associated with tenant energy consumption. • *No full whole-life or whole-system carbon assessment (paragraph 3.15.34, item 1)* – the Applicant disagrees, this has been completed – ES Chapter 15 (Climate Change) (Climate Change) (Document 6.15/**APP-183**) assesses emissions arising from the construction, operation, and whole lifetime of the scheme. Embodied carbon is quantified, including emissions from products and materials, transport to site and activity on site. Emissions associated with maintenance, repair and replacement over the operational lifetime have also been quantified and assessed. No material emissions have not been captured as part of the GHG calculations for the project either quantitatively or qualitatively to inform the assessment of significance. • *Heavy reliance on assumptions around renewables and grid interaction (paragraph 3.15.34, item 2)* – these comments appear more closely related to a renewable energy scheme. The assessment has not quantified export feasibility, curtailment scenarios or the impact in delivered carbon savings (assumed to be from export of renewables to the grid) given this is not the purpose of the scheme. The OxSRFI scheme is not intending to export generated electricity, and as such that issue falls outside the scope of the Energy Strategy (Document 6.15D/APP-304). The ability/inability of the OxSRFI scheme to export renewable energy would not impact on the emissions arising from the scheme itself, and the scheme's 'climate performance' is not contingent on this. Any emissions savings enabled by exporting renewable power to the grid would be an indirect benefit above that stated in ES Chapter 15 (Climate Change) (Document 6.15/**APP-183**) as this was not considered or assumed within the EIA. As such, a conservative emissions magnitude has been presented and assessed, alongside emissions savings achieved through the implementation of the energy hierarchy.

Summary of Representation	Applicant Response
	• *Limited ambition in demand reduction and energy system design (paragraph 3.15.34, item 4)* – the Applicant does not agree with this statement. The building fabric and services have been designed to exceed minimum requirements (as in 2026). Such energy efficiency measures, alongside the installation of air source heat pumps, solar PV (with potentially up to 100% coverage of available roof space) and co-location of BESS presents a clear mechanism to reduce emissions arising from operational energy consumption. This is further supported by commitment from the Applicant to use a form of green leases within tenant clauses, and enabling utility consumption monitoring. Until the tenants are known it is not possible to design in further demand reduction as it is not known what demand may need reducing. Further depending on the future tenants and the nature of their operations, the building design may have no influence over the demand, increasing the importance of green lease clauses. *Please also note:* local district heating was investigated but found to have a carbon factor 2-3 times higher than grid electricity. Combined heat and power requires connection to mains gas supply, so the development would not be 'net zero ready'. Furthermore, the majority of the warehouse buildings will most likely be un-conditioned, therefore localised heating / cooling is typically more efficient as there is less thermal loss. • *No clear linkage to net zero trajectories or carbon budgets (paragraph 3.15.34, item 5)* – disagree, each section assessing significance within in ES Chapter 15 (Climate Change) (Document 6.15/**APP-183**) considers significance in the context of national carbon budgets (against which emissions arising from the OxSRFI are quantified), and national decarbonisation and net zero policy. This is in line with ISEP guidance on the assessment of GHG emissions (ISEP, 2026). Local carbon budgets are not quantitatively contextualised against given the scheme is of national significance. **16. Cumulative Effects** – the comments are acknowledged. It should be noted 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**). **17. Summary of Effects** – the comments are acknowledged. It should be noted the Applicant has undertaken an assessment of effects throughout the ES with a summary provided in ES Chapter 17 (Summary of Effects) (Document 6.17/**APP-185**).

Summary of Representation	Applicant Response
	Additional Comments – DCO – The Applicant's response to CDC's comments on the draft DCO are set out in the schedule and **Appendix A.**

OxSRFI – Applicant's Comments on Relevant Representations
Document 9.1B – Environment Agency Comments (RR-042) – Appendix B

The Table below provides a summary of the Relevant Representations (RR-042) made by Environment Agency (EA) and the Applicant's response to the issues raised. This has been separated from the main schedule given its length, and with the intention of it being more easily reviewed by the ExA and other parties. The summary and response are set out according to the specific issues (and references used by the EA to refer to each) as set out in the RR, for ease of reference, with a response to the draft DCO within Document 9.1A.

EA Issue No.	Issue summary description	Applicant Response
EA01	Requirement 10 does not identify the Environment Agency as a consultee for matters within its statutory remit.	The Applicant's responses to the EA's comments on the DCO are contained in **Appendix A.**
EA02	The use of phrases such as "in accordance with the principles of" and "substantially in accordance with" in DCO Requirements undermines enforceability and creates unnecessary uncertainty.	The Applicant's responses to the EA's comments on the DCO are contained in **Appendix A.**
EA03	Requirement 22 provides for the review and approval of floodplain compensation details but does not identify the Environment Agency as a named consultee.	The Applicant's responses to the EA's comments on the DCO are contained in **Appendix A.**

EA Issue No.	Issue summary description	Applicant Response
EA04	The Environment Agency is not mentioned as a named consultee for draft Requirement 28 and the Requirement does not specify construction is to stop within the area where contamination is suspected.	The Applicant's responses to the EA's comments on the DCO are contained in **Appendix A.**
EA05	The Environment Agency is not mentioned as a named consultee for draft Requirement 29 in relation to approval of the verification investigation.	The Applicant's responses to the EA's comments on the DCO are contained in **Appendix A.**
EA06	The discharge procedure does not specify a minimum consultation period for named Requirement consultees.	The Applicant's responses to the EA's comments on the DCO are contained in **Appendix A.**
EA07	The Environment Agency is not currently in a position to agree Article 52 and is discussing its drafting with the Applicant.	The Applicant's responses to the EA's comments on the DCO are contained in **Appendix A.**
EA08	Potential requirement for a Flood Risk Activity Permit has not been identified within the Other Consents and Licences Statement.	Communication with Thames Water is ongoing regarding the proposed foul sewer outfall. Due to the route to the proposed outfall crossing a culverted main river it is currently anticipated that a Flood Risk Activity Permit (FRAP) will be required. A FRAP application will be made ahead of construction, The Applicant will provide an updated Other Consents and Licences Statement at Deadline 1 to reflect this.
EA09	The freeboard allowance for warehouse finished floor levels has not been specified.	The development will sit on plateaus which are raised significantly above the design event flood level. As stated in the FRA (Document 6.9B/**AS-076**), the Cherwell SFRA District Council Level 1 SFRA (2017 Update) states that for non-residential development finished floor levels may not need to be raised further. Including this detail in the FRA report would not change the overall assessment and conclusions of

EA Issue No.	Issue summary description	Applicant Response
		the FRA. Nevertheless for clarity an updated FRA with finished floor levels explicitly stated can be provided, and the Applicant will submit in accordance with details in the Cover Letter for Procedural Deadline A.
EA10	The proposed culvert freeboard height has not been specified.	The Applicant notes the points raised around freeboard levels. The FRA (Document 6.9B/AS-076) states in Section 4.6 that even in the 1 in 1000-year flood event, the proposed culverts demonstrate the required freeboard. As above (issue EA09), including this detail in the FRA report would not change the overall assessment and conclusions, but for clarity an updated FRA can be provided, and the Applicant will submit in accordance with details in the Cover Letter for Procedural Deadline A.
EA11	There are uncertainties associated with the model representation for the Gagle and Ashgrove Brooks.	The Applicant understands that this comment relates to uncertainty as to whether the Applicant has addressed the minor comments raised by the EA upon their review of the hydraulic modelling. For completeness, the Applicant confirms that those comments were addressed, but acknowledges that the submitted FRA does not include a 'review form' explaining where those comments were addressed. For clarity a modelling report with finalised model review form can be provided.
EA12	Future assessment of the proposed diversion and culverting of Ashgrove Brook has not been secured through the DCO.	Details on the proposals for the diversion and culverting works on Ashgrove Brook will form part of the detailed design once layout and levels are fixed across the development. A conservative approach has been applied within the modelling removing the potential flood storage that would be provided by these works. This approach shows a worst-case scenario which still shows an appropriate level of risk downstream.
EA13	There are uncertainties associated with the representation of the A43 culvert within the Padbury Brook hydraulic model.	See the Applicant's response to EA11 above.
EA14	Insufficient evidence to describe aquatic habitat and justify scoping fish out of the assessment.	Beyond the Gagle Brook the other on-site watercourses comprise ditches and minor brooks with low flow that seasonally run dry and as such are not considered suitable to support spawning fish. The Applicant remains of the view that these characteristics justify the scope of the assessment regarding aquatic habitats and ecology. Paragraph

EA Issue No.	Issue summary description	Applicant Response
		21.22 of the submitted CEMP Document 6.2C/APP-189) confirms that works within and adjacent to the Gagle Brook channel will not be undertaken during October to May (to avoid the main fish spawning period). Further details will be provided within the updated CEMP as outlined under point EA15 below should any relevant watercourse section continue to hold sufficient water at the time of proposed works that they potentially support fish. The updated CEMP will be provided as set out in the Cover Letter for Procedural Deadline A.
EA15	The CEMP does not include measures specifically relating to protection of watercourses during diversion works.	The CEMP (Document 6.2C/APP-189) will be updated to specify that each channel section will be subject to detailed inspection by the Ecologist prior to the commencement of any construction works within or adjacent the channel/s (also see EA16 re: the riparian buffers). Where works are required in the presence of water (beyond shallow pools or ditches with no/low flow), appropriate mitigation will be implemented at that point in line with established guidance and/or in consultation with the EA. Such works will where practicable utilise temporary diversion channels. Otherwise suitably qualified operatives will undertake fish rescue and relocation. Where appropriate, screened pumps/siphons and gravity/flume pipes will be utilised to maintain habitat connectivity during construction. Full detail of precautionary working methods is required to be provided within the relevant P-CEMPs (secured by Requirement 10).
EA16	The documentation does not specify where the 10m riparian buffer will be measured from.	The Applicant will update the CEMP (Document 6.2C/APP-189) (paragraph 21.19) to confirm that the 10m riparian buffer will be measured from the bank tops. The updated CEMP will be provided as set out in the Cover Letter for Procedural Deadline A.
EA17	Biosecurity procedures for non-native crayfish are not included.	In response to the EA's comments the CEMP (Document 6.2C/APP-189) paragraph 21.72 will be amended to acknowledge it is an offence under the WCA 1981 to return removed non-native crayfish to the wild and to include monitoring with appropriate biosecurity control procedures to be followed should signal crayfish or other non-native crayfish species be encountered during construction works, together with a requirement for their humane dispatch where necessary, and appropriate disposal on

EA Issue No.	Issue summary description	Applicant Response
		site. This will then provide clearer and more detailed requirements of the phase specific CEMPs in due course. The updated CEMP will be provided as set out in the Cover Letter for Procedural Deadline A.
EA18	Culverts are proposed to facilitate watercourse crossings.	The use of culverts has been minimised as far as possible and is largely confined to sections crossed by highways infrastructure. Where the Gagle Brook is proposed to be routed underneath the Middleton Stoney Relief Road this will be via an oversized culvert (internal dimensions 6m(w) x 3.5m(h)) with an invert level set 0.3m below the existing bed that will retain the watercourse and adjacent habitats with minimal alteration. A clear span bridge is not feasible at this location due to the scale of the span necessary supporting bridge structure being out of proportion with the function of the bridge and resulting in a far greater disruption to the Gagle Brook corridor.
EA19	It is unclear whether the eastern section of Padbury Brook has been characterised.	The drafting error within ES Appendix 6.1 Ecological Appraisal Report (Document 6.6A/**AS-068**), section 5.108 will be amended to ensure the section of Padbury Brook east of the M40 culverts is accurately described and characterised, and that any related assessments and figures are updated accordingly. The updated report will be provided as set out in the Cover Letter for Procedural Deadline A.
EA20	An inappropriate definition of temporary effects has been applied.	The Applicant acknowledges the EA's comments with regard to the definition of temporary effects within the WFD assessment of ES Chapter 9 (Water Environment) (Document 6.9/**APP-177**) but the Applicant considers the approach taken is robust and in line with best practice, and has been accepted by the EA in numerous other assessments.
EA21	The study area does not extend around the full Order Limits.	The Applicant can confirm that the Assessment undertaken was on the correct Order Limits, but acknowledges that the Figures reflect previous draft Order limits. This can be addressed through an update to the report to replace the out of date Figure if considered necessary, however, it is not felt that this would materially impact the Application, and the Applicant reiterates that the correct Assessment was undertaken.
EA22	There is a lack of consistency and clarity regarding	The Applicant acknowledges the EA response on this. Although the overall conclusions of ES Chapter 9 (Water Environment) (Document 6.9/**APP-177**) are unlikely to be

EA Issue No.	Issue summary description	Applicant Response
	groundwater effects considered in the assessment.	affected, the Applicant acknowledges that increased clarity could help and therefore an update to the ES Chapter, specifically Table 9.3 can be undertaken.
EA23	Order Limits differ from those shown elsewhere in the ES.	As for EA21 above, the Applicant can confirm that the Assessment undertaken was on the correct Order Limits. This discrepancy can be addressed through an update to the report to replace the out of date Figure if considered necessary, however, it is not felt that this would materially impact the application.
EA24	Groundwater bodies have not been included in the WFD assessment.	Provision is made within the WFD Assessment (Document 6.9E/**AS-079**) within Table 6 to ensure that suitable mitigation is put forward to avoid any deterioration to groundwater body status with further information provided within the CEMP (Document 6.2C/**APP-189**) and phase specific CEMPs in due course.
EA25	Groundwater dewatering has not been addressed.	Regarding the potential requirement for groundwater dewatering during construction and the associated management of any contaminated groundwater or leachate, the landfill currently operates under an Environmental Permit, which includes controls for the collection, management, treatment and discharge of leachate. These arrangements will remain in place throughout the construction period and any groundwater, leachate or contaminated water encountered during earthworks would be managed in accordance with the requirements of the existing permit and any additional regulatory approvals determined necessary by the EA. The Environmental Statement focuses on the likely significant environmental effects of the proposed development for the purposes of the DCO application, and reflects the fact that additional design and other details regarding the landfill reprofiling works are to be confirmed and agreed post-consent, including some detailed issues regarding construction and engineering solutions associated with issues such as potential dewatering, if required. The management of leachate, contaminated groundwater, dewatering discharges and associated permitting requirements are regulated through the Environmental Permitting regime and detailed controls relating to these issues, if relevant, will be appropriately addressed through the existing permitting framework. At this stage, detailed construction methodologies, including any temporary dewatering requirements, have not been finalised. Should dewatering be required, the contractor

EA Issue No.	Issue summary description	Applicant Response
		will be required to assess the relevant permitting, abstraction and discharge requirements and obtain any necessary approvals prior to commencement. Appropriate measures would be implemented to ensure that dewatering activities do not adversely affect the operation of the landfill's leachate management system or result in unacceptable environmental impacts. In summary, the Applicant notes the EA's comments and confirms that any future dewatering requirements will be undertaken in compliance with the Environmental Permit and any other relevant consents, licences or approvals required at the time of construction.
EA26	Insufficient evidence provided to justify attenuation and dispersion assumptions.	The Applicant notes the EA's comments regarding the evidence for attenuation and dispersion of contaminants within the underlying limestone. The Ground Conditions chapter does not seek to reassess the environmental acceptability of the existing permitted landfill, nor to determine compliance with the requirements of the Environmental Permit. The references to attenuation and dispersion are based on the established conceptual site model and the regulatory framework under which the landfill currently operates. The landfill is a permitted attenuation and dispersion landfill and has been subject to detailed hydrogeological assessment as part of the Environmental Permitting regime. The acceptability of contaminant migration pathways, including the attenuation and dispersion processes operating within the underlying strata, has therefore been considered separately by the EA through the landfill permitting process. In addition, the site is subject to ongoing groundwater monitoring in accordance with permit requirements. The purpose of the Ground Conditions chapter is to assess the likely significant environmental effects arising from the Proposed Development. It is not intended to revisit or validate the hydrogeological risk assessment that supports the operation of the existing landfill or to reassess risks associated with the baseline landfill condition. Accordingly, the chapter has relied upon the established baseline position that the landfill is operating under a current Environmental Permit, supported by an approved hydrogeological risk assessment and groundwater monitoring regime.

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		The identified groundwater contaminant concentrations therefore form part of the existing baseline condition of the site and do not represent an impact arising from the Proposed Development itself. The Proposed Development does not alter the established attenuation and dispersion principles upon which the permitted landfill operation is based, nor does it modify the existing groundwater monitoring and environmental management controls in place under the Environmental Permit. Consequently, no further assessment of attenuation and dispersion within the limestone has been included within the Environmental Statement, as this matter falls within the scope of the existing Environmental Permitting regime rather than the assessment of likely significant effects of the Proposed Development.
EA27	Investigation boundaries do not align with the Order Limits.	The relevant risk assessments have been focused on those areas where physical development, ground disturbance or construction activities associated with the Proposed Development are anticipated, including: • Preliminary Risk Assessments (Main Site Phase 1 Geotechnical Geoenvironmental Desk Study (Document 6.11A/**APP-286**); • Off-site Highways Geotechnical Geoenvironmental Desk Study (Document 6.11B/**APP-287**)); • Main Site Phase 2 Geo-Environmental Assessment (Document 6.11D/**APP-289**); • Road Corridor Geo-Environmental Assessment (Document 6.11E/**APP-290**). The assessments have therefore been undertaken in accordance with the requirements of the Environmental Statement and have considered the areas where there is potential for likely significant effects to arise. Whilst the Order Limits encompass a larger area, including parts of the existing Ardley Fields landfill, these additional areas have been included primarily to provide powers for access, environmental monitoring, installation of additional groundwater monitoring infrastructure if required, maintenance or modification of existing monitoring infrastructure, and activities associated with the operation and regulation of the existing

EA Issue No.	Issue summary description	Applicant Response
		Environmental Permit. No substantive development, engineering works or ground disturbance are proposed across the majority of these areas. The existing Ardley Fields landfill is a permitted facility that has been subject to extensive site investigation, hydrogeological risk assessment and ongoing environmental monitoring under the Environmental Permitting regime. The inclusion of these areas within the Order Limits does not alter their existing use, nor does it introduce new contamination sources or pathways requiring reassessment through the planning process. As no development is proposed within these parts of the Order Limits, the Applicant does not consider it necessary or proportionate to undertake additional Preliminary Risk Assessments or intrusive ground investigations solely because they fall within the Order Limits. The purpose of the land contamination assessment is to evaluate the potential effects of the Proposed Development and associated ground disturbance, rather than to reassess the condition of the wider permitted landfill. A figure identifying the Order Limits and the extent of the areas subject to geo-environmental assessment can be provided, together with clarification within the Environmental Statement that certain parts of the Order Limits are included solely for monitoring, access and permitting purposes and are not proposed for development. The assessment coverage should therefore be considered in the context of the proposed works rather than the full extent of the Order Limits. Consequently, the Applicant considers that the investigations undertaken are appropriate and proportionate to the nature and extent of the Proposed Development and that no additional intrusive investigation is required in those areas of the Order Limits where no development or ground disturbance is proposed.
EA28	No clear mechanism secures remediation of known contamination.	The Applicant disagrees with the EA's comments regarding the mechanism for securing remediation of known contamination. Requirements 28 and 29 of the Draft DCO (Document 3.1/**APP-139**) have been included to address the potential discovery of previously unidentified contamination during construction and to ensure that any necessary investigation, remediation and verification measures are appropriately implemented should such circumstances arise.

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		The Applicant does not consider that an additional requirement securing remediation of "*known contamination*" is necessary. The land contamination assessments undertaken to support the application have not identified contamination requiring remediation. Known contamination is present within the existing Ardley Fields landfill and has been identified as part of the baseline conditions. However, this contamination forms part of an operational permitted landfill and is regulated through the Environmental Permitting regime. The landfill is operated in accordance with an Environmental Permit, supported by established controls relating to landfill engineering, leachate management, groundwater monitoring and environmental protection. Whilst elements of the landfill mass will be reprofiled as part of the Proposed Development, these activities will be undertaken in accordance with the relevant Environmental Permit requirements and any associated approvals agreed with the EA. The management of landfill materials, including any measures required to control risks associated with contaminated waste, leachate generation, groundwater protection and restoration profiles, will therefore be secured through the environmental permitting framework rather than through a remediation strategy secured by the DCO. Accordingly, the remediation and management of known contamination associated with the landfill is already subject to an established regulatory regime and does not require a separate DCO requirement. Requirements 28 and 29 are intended to address unforeseen contamination encountered during the course of the authorised development and provide an appropriate mechanism for managing contamination risks arising from previously unidentified contamination. The Applicant therefore considers that appropriate and enforceable mechanisms are in place to manage both known and unknown contamination, with the former regulated through the Environmental Permit and the latter secured through Requirements 28 and 29 of the draft DCO.
EA29	Controlled waters receptor omitted from conceptual site model.	The potential pollutant linkage between landfill-derived contaminants within the existing made ground/waste mass, migration via groundwater pathways, and controlled waters was identified and considered as part of the wider ground conditions assessment. As noted within ES Chapter 11 (Ground Conditions, Document 6.11/**APP-179**), the

EA Issue No.	Issue summary description	Applicant Response
		presence of putrescible waste and leachable contaminants within the landfill material has the potential to result in leachate generation and infiltration to groundwater, and this has been reflected in the assessment of effect significance presented within the Environmental Statement. The omission of this linkage from Table 11.10 does not indicate that the risk pathway was not considered. Rather, Table 11.10 is intended to summarise the significant pollutant linkages relevant to the assessment of likely significant effects arising from the Proposed Development. The identified linkage principally relates to the existing landfill baseline condition and is already subject to regulation and management through the Environmental Permitting regime. Ardley Fields landfill operates under an Environmental Permit supported by a hydrogeological risk assessment, leachate management controls and an ongoing groundwater monitoring programme. The pollutant linkage between landfill-derived contaminants and groundwater is therefore already recognised and managed through the existing regulatory framework. The purpose of the Ground Conditions chapter is not to reassess the acceptability of the existing permitted landfill or its compliance with permit requirements, but rather to assess whether the Proposed Development would introduce new pollutant linkages or materially alter existing risks. The Proposed Development does not introduce a new source of contamination, create a new groundwater pathway, or fundamentally alter the existing landfill containment and monitoring strategy. Consequently, the identified groundwater pollutant linkage represents an existing baseline condition rather than a significant new effect arising from the Proposed Development. Nevertheless, to improve clarity and consistency, the Applicant will review the presentation of the Conceptual Site Model and include appropriate cross-referencing to the discussion of the landfill-groundwater pollutant linkage and its management through the Environmental Permitting regime, and will continue to discuss these points with the EA.

EA Issue No.	Issue summary description	Applicant Response
EA30	Groundwater receptors are not explicitly referred to in construction mitigation.	The intent of the mitigation measures described in Section 11.5.2 of ES Chapter 11 (Ground Conditions) (Document 6.11/APP-179) and the CEMP (Document 6.2C/APP-189) is to protect both surface water and groundwater receptors during the construction phase. The reference to surface water receptors does not imply that groundwater receptors have been excluded from consideration. Potential risks to groundwater have been considered within the Ground Conditions assessment, and the construction-phase mitigation measures contained within the CEMP are intended to prevent the creation of pollution pathways and to control the release of contaminants that could affect either surface water or groundwater receptors. To provide greater clarity, the Applicant will amend Section 11.5.2 and, where appropriate, the CEMP to explicitly refer to groundwater receptors alongside surface water receptors when describing the objectives and application of construction-phase mitigation measures. Such amendments would be to ensure clearer and more detailed requirements are set out for the phase specific CEMPs in due course. The Applicant considers this to be a clarification of the existing mitigation approach rather than a change to the assessment or mitigation strategy, as groundwater protection measures are already embedded within the construction environmental management framework. The updated CEMP will be provided as set out in the Cover Letter for Procedural Deadline A.
EA31	Need for further contamination investigations is not reflected in ES Chapter 11.	The Environmental Statement recognises that ground investigations undertaken to date have informed the preliminary assessment for the road corridors and that further targeted ground investigations and detailed geotechnical assessments will be undertaken as part of the detailed design process, where required. This requirement is already embedded within the Scheme through the commitment to undertake detailed geotechnical design and assessment in accordance with DMRB CD 622 for National Highways assets and relevant Network Rail standards. Should any previously unidentified contamination be encountered during these investigations or subsequent construction activities, it will be managed in accordance

EA Issue No.	Issue summary description	Applicant Response
		with relevant legislation, industry guidance and environmental management procedures. No significant effects on controlled waters have been identified at this stage.
EA32	Groundwater monitoring plan lacks detail.	The groundwater monitoring referred to in the Environmental Statement relates principally to the ongoing monitoring requirements associated with the existing permitted landfill and any landfill relocation works, which are matters regulated through the Environmental Permitting regime rather than the DCO process. Detailed monitoring objectives, methodologies, trigger levels, reporting procedures and links to Construction Quality Assurance requirements will be developed and agreed through the relevant permitting and environmental management processes, as appropriate. The purpose of the Environmental Statement is to identify and assess the likely significant effects of the Proposed Development, rather than to duplicate the detailed controls and monitoring requirements secured through the Environmental Permit. Accordingly, no further detail is considered necessary for the purposes of the DCO application, noting that groundwater monitoring will continue to be undertaken in accordance with the requirements of the Environmental Permit and any associated approved management plans.
EA33	Groundwater pollution prevention measures lack sufficient detail.	Groundwater pollution prevention measures are listed within Table 6 of the WFD Assessment (Document 6.9E/**AS-079**) as well as in ES Chapter 9 (Water Environment) (Document 6.9/**APP-177**) and the CEMP (Document 6.2C/**APP-189**).
EA34	Foundation Works Risk Assessment not referenced in CEMP.	The Applicant agrees that, where relevant, in the unlikely event that penetrative foundation solutions are required, a Foundation Works Risk Assessment will be undertaken in accordance with current best practice guidance, including CL:AIRE Piling and Penetrative Ground Improvement Methods on Land Affected by Contamination: Guidance on Pollution Prevention (March 2025). A commitment to undertake such assessments, where required by the proposed foundation design and ground conditions encountered, will be included within the CEMP (Document 6.2C/**APP-189**) and relevant phase-specific CEMPs to ensure risks to groundwater are appropriately identified and managed.

EA Issue No.	Issue summary description	Applicant Response
EA35	Unclear which activities are regulated by DCO and which by permitting.	The reprofiling of the landfill and removal / decommissioning of the composting facility (except for variation of a 3rd party permit) are to be regulated under the environmental permitting regime. Works that are not part of the permitting regime form part of the DCO process.
EA36	No alternative management option identified for excavated landfill waste.	The principle of reprofiling waste within the existing landfill area (under an amended Environmental Permit) was agreed with the EA earlier in the application (and ES) preparation process. Alternatives, including removal off-site are considered sub-optimal from a sustainability and commercial perspective, and given the EA's agreement to the principle of reprofiling (relocating) the waste, these alternative options do not form part of the Applicant's strategy. As reflected in the EA's RR, were the material to be taken off-site this can reasonably be assumed to have likely additional transport and associated carbon emissions implications, as well as potentially additional construction noise and odour implications compared to the strategy agreed in principle with the EA (to retain the waste on-site). As referred to earlier in the Applicant's response to the EA's RR, the clear indication that no reasons have been identified why the works could not be permitted is welcome, and the Applicant is in ongoing dialogue with the EA to respond to the outstanding detailed queries raised.
EA37	Mitigation and management measures for pre-commencement activities are unclear.	The Applicant's responses to the EA's comments on the DCO are contained in **Appendix A.**
EA38	EA Water Quality Explorer data not included.	Water quality data has been assessed as part of the WFD Assessment (Document 6.9E/AS-079) previously. It is acknowledged that there may be more recent data available since the Applicant's assessment was undertaken, however the Water Quality Explorer data is high-level, catchment level data, whereas the Applicant has undertaken site-specific testing. It is not considered necessary to include any further assessment of this new, non-site specific data, and any such assessment would be unlikely to have any effect on the overall conclusions of the WFD assessment or ES Chapter 9 (Water Environment) (Document 6.9/APP-177).

EA Issue No.	Issue summary description	Applicant Response
EA39	Pollution prevention guidance references are outdated or incomplete.	The CEMP (Document 6.2C/APP-189) paragraph 11.8 will be updated to reflect the latest CIRIA SUDS Manual (c753) and EA Pollution Prevention Guidance to enable that the current industry guidance is being reflected. In addition, paragraph 17.2 of the CEMP references guidelines that have now been withdrawn. The updated CEMP will be provided as set out in the Cover Letter for Procedural Deadline A.
EA40	Water quality monitoring strategy not provided.	The CEMP (Document 6.2C/APP-189) paragraph 11.8 states that arrangements for monitoring water bodies to ensure and demonstrate water quality will be the responsibility of the contractor. Further details are found within the paragraphs 11.9 and 11.10 of the CEMP however, further details will be added to this section to provide clearer and more detailed requirements of the phase specific CEMPs in due course. The updated CEMP (and any necessary updates to the DCO Requirements) will be provided as set out in the Cover Letter for Procedural Deadline A.
EA41	Fuel, oil and chemical storage controls lack sufficient detail.	The CEMP (Document 6.2C/APP-189) does contain information with regard to storage of chemicals and fuels however, it is noted that there are some inconsistencies in the document as identified by the EA. The CEMP will be updated and will provided as set out in the Cover Letter for Procedural Deadline A.
EA42	Insufficient information on construction wastewater management.	The CEMP (Document 6.2C/APP-189) paragraphs 19.3 – 19.5 includes details regarding construction waste water management, with phase specific P-CEMPs to provide further specific details for approval. This includes with regard to wheel washing, vehicle washing and concrete related construction activities, and the detail required by phase-specific P-CEMPs. This will be cross referenced against the mitigation parameters proposed in the CEMP. The updated CEMP will be provided as set out in the Cover Letter for Procedural Deadline A.
EA43	Construction phase foul water arrangements are unclear.	Further information will be included in the CEMP (Document 6.2C/APP-189) to add clarity on the management of foul water during construction, which will be subject to details determined by contractors and agreed via phase specific CEMPs in due course. The updated CEMP will be provided as set out in the Cover Letter for Procedural Deadline A.

EA Issue No.	Issue summary description	Applicant Response
EA44	Solar PV specification, PFAS content and maintenance regime not defined.	The detailed specification and supplier of solar PV is not yet known. The Applicant is content to agree that any cleaning of solar PV panels will be with PFAS free products.
EA45	Operational pollution sources are omitted from the assessment.	The Applicant would appreciate specific direction from the EA on this point. ES Chapter 9 (Water Environment) (Document 6.9/APP-177) does consider pollution sources and impacts on water quality.
EA46	Potential requirement for water discharge permit has not been identified.	Water discharges in the landfill area will be addressed separately under the Environmental Permitting. Elsewhere, Water Discharge Activity Permits will not be required for the final drainage strategy during the operational phase. The contractor will apply for such permits during the construction phase, if required. e.g. dewatering or temporary discharges of treated water. The Applicant will provide an updated Other Consents and Licences Statement at Deadline 1 to reflect this.
EA47	It is unclear how operational SuDS maintenance will be secured.	The Sustainable Drainage Statement (SDS) – Main Site (Document 6.9C/AS-077) discusses the proposed drainage interventions for the proposed scheme. In Section 4 of the report, the expected maintenance regime is outlined. Further information will be provided at a later date prior to handover of the drainage to a management company. The Applicant proposes to amend Requirement 21 of the DCO to include reference to maintenance, this will be included in the dDCO submitted at Deadline 1.
EA48	Unclear whether penstocks form part of the drainage design.	The drainage strategy will include the provision of penstocks to isolate parts of the drainage system during a pollution event to prevent contamination from areas further down the catchment/drainage system. Detailed design and future maintenance will be secured through Requirement 21 of the DCO, detailed plans will show locations of these assets.
EA49	No information provided on management or capping of the IVC borehole.	The borehole at the IVC facility will be decommissioned in accordance with Environment Agency Guidance ("Good Practice for Decommissioning Redundant Boreholes and Wells" (2012)).

OxSRFI – Applicant's Comments on Relevant Representations
Document 9.1B – OCC Comments (RR-109) – Appendix B

The Table below provides a summary of the Relevant Representations (RR-109) made by Oxfordshire County Council and the Applicants response to the issues raised.
The RR covers multiple issues and topics (across most ES chapter topics), as well as comments regarding wording and content of the draft DCO. It is comprehensive, extending over approx. 45 pages on various ES related topics alone. The summary and responses are set out with reference to the issues or headings used in the RR, with a response to the draft DCO within Document 9.1A.

Summary of Representation	Applicant Response
1. **Landscape & Visual** – the Council sets out concerns that the LVIA is not sufficiently robust in assessing likely effects, and refers to additional information requested to aid its ongoing review. OCC is concerned about the effects of the proposed change from open agricultural land to large-scale development on local landscape character and views. The RR includes extensive detailed points regarding the LVIA and the likely effects of the scheme (paragraphs 29 – 57 of the RR). This includes questions about the LVIA methodology and categorisation of 'significant', and suggests additional viewpoints which could be incorporated into	The Applicant welcomes the clear indications that OCC supports the principle of SRFIs and the benefits they deliver, and that local policies support the provision of SRFI. It is also noted and welcome that OCC considers OxSRFI complies with the definition of SRFI as set out in the NPS. Notwithstanding the introductory narrative to the RR which suggests some '*significant areas of disagreement*' remain, the content of the RR underlines the extent of general agreement and the relatively limited areas of disagreement. The Applicant would characterise much of the content of the RR as identifying a number of topics where ongoing clarification, additional detail, or reassurance is sought by OCC. The Applicant's reading of the RR is that there are actually few areas resembling significant disagreement at this stage. As referred to in the RR, dialogue between OCC and the Applicant is ongoing with a view to addressing the concerns and queries raised (and on many issues this dialogue pre-dates the RR). The response below covers all issues raised in a proportionate way with a focus on those issues where there are clearly most outstanding issues and queries, or apparent disagreement. **1.** **Landscape & Visual** – dialogue regarding the issues raised is ongoing at the time of the RR submission (we note OCC and Cherwell District Council have jointly responded on landscape and visual issues). The pragmatic recognition by OCC that developments of this scale will inherently cause some effects on the existing landscape is welcome, but there ongoing concerns are noted.

Summary of Representation	Applicant Response
the assessment. The RR includes a section focused on 'design' which repeats concerns about scale of warehousing and the mitigation proposed, including (RR paragraph 48) whether the parameters proposed will enable delivery of all mitigation proposed or required. It also comments on night-time and lighting issues. 2. **Rail (with a focus on a potential future new Ardley passenger Station)** – OCC confirms its support for rail freight in principle and alignment with the OxRail 2040 strategic priorities. Further evidence or clarity is sought on long-term capacity on the Chiltern Main Line, and regarding whether OxSRFI may affect delivery of a future passenger station at Ardley. OCC seek more 'passive provision' by OxSRFI ahead of this potential future new Station. 3. **Minerals & Waste** – the RR focuses on local policy issues and concerns related to the OxSRFI Main Site's location in a Mineral Safeguarding Area for crushed rock and concerns about sterilisation of some of the on-site resource. Further information is sought about	The submitted LVIA follows an established methodology, based upon the Guidelines for Landscape and Visual Impact Assessment (3rd Edition) (GLVIA3) and is used consistently by FPCR and which has been found acceptable and appropriate as part of the ESs for several other NSIP SRFIs and numerous major development applications and Planning Appeals across the UK. The LVIA provides a robust assessment of the likely effects of the proposed development and identifies some likely residual significant effects on local landscape character and for some visual receptors. The proposed embedded mitigation and design response includes variations in built development parameters (max heights) across the site as a direct response to landscape and visual effects, as well as extensive landscaping and earthworks to contain and reduce visibility of buildings and activity within the site. The proposed scale of development and the type and nature of the mitigation proposed is considered proportionate and appropriate and has been informed by the LVIA work. 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). The results of the LVIA demonstrates 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. The RR repeats requests for additional information already made during dialogue with the Applicant. In advance of the RR the Applicant shared additional information requested by OCC and CDC including additional ZTVs and wire-frame visual images to further aid their understanding of the potential 'worst-case' and to help inform its position regarding the proposals. Clarifications on lighting issues were also provide in advance of the RR including sign-posting to the submitted Lux and light-spill diagrams submitted with the Application. Further additional information is being progressed by the Applicant in response to the requests by CDC and OCC, including additional photomontage images from key viewpoints (including night-time), additional cross-section details around the terminal area, and laying additional heritage information onto ZTVs. These will be shared when completed, which the Applicant anticipates to be at or in advance of Deadline 2. **2.** **Rail** – the Applicant is in ongoing constructive dialogue with OCC (and CDC) and technical dialogue with its advisors (SLC) is ongoing, including work on a potential SoCG on rail issues. The Applicant has

Summary of Representation	Applicant Response
assumptions in the Minerals Resource Assessment. Regarding waste, OCC is concerned about the loss of a current safeguarded (green) waste facility at Ashgrove Farm, and the potential implications on the Councils Waste Strategy. Further information is sought about waste management and waste arisings from the OxSRFI scheme, and also about impacts on the Ardley Landfill site. 4. **Principle of Development** – The RR is clear that OCC is supportive of SRFIs and the benefits they deliver with regard to moving freight from road to rail. With reference to external rail advice the RR confirms that the OxSRFI scheme meets the minimum criteria defined by the NPS. OCC confirms its policies support the provision of SRFIs. However, further justification is sought in the RRep regarding the scale (height and massing) of warehousing proposed in the context of likely residual environmental effects. OCC also question need for National Distribution Centres (NDCs) at the site, and suggest other sites nearby might address the local need for	undertaken an assessment, set out within the Planning Statement Appendix 3 (Passenger Rail Station Note (Document 5.4C/AS-050), which demonstrates that the OxSRFI will not prejudice the future provision of a passenger station at Ardley and indeed can deliver a number of potential benefits that could aid deliver and implementation. It is considered that the responses provided to date (notably in the Q&A section of GB Rail freights Supporting Statement Doc ref 7.2B), and the Applicant's signed SoCG with Network Rail (AS-092) provides the reassurances sought regarding interactions with passenger traffic and the approach to future timetable planning. The recent email received by the Applicant from Network Rail (at **Appendix D**) also refers directly to a number of issues raised. **3.** **Minerals & Waste** – the Applicant's submitted application, including in ES Chapters 11 Ground Conditions (Document 6.11/APP-179) and Chapter 13 Materials and Waste (Document 6.13/APP-181) the Planning Statement (Document 5.4/APP-161) identifies a degree of tension with local minerals and waste policies, but also identifies appropriate mitigation to minimise the extent of harm or policy conflict. The approach taken is considered appropriate and proportionate, including the assessments of waste arisings and implications for local waste treatment capacity, including with regard to the proposed loss of the current green waste (IVCF) on-site which has a current least until 2031 which will not be extended if OxSRFI is approved. As set out in ES Chapter 11, the proposals would include use in construction of site-won minerals resources to minimise the impacts on other sources of mineral products and the extent of sterilisation of on-site resources. **4.** **Principle of Development** – As above, the Council's agreement to the principle of the benefits and role of an SRFI, and that OxSRFI satisfies the NPS, is clearly positive. The Applicant has discussed with OCC its queries regarding scale and need, and continues to explain the market rationale and context for the scheme with reference to the Design Approach Document (Document 5.5A/APP-166) Market Analysis Report (Document 7.1/APP 311) and the Planning Statement (Document 5.4/APP-161), supported by the GB Railfreight Supporting Statement (Document 7.2B/APP-313). The Applicant's evidence and case is rooted in the National Policy Statement (NPS) which provides a clear policy approach based on "*a compelling need for an expanded network of SRFIs throughout the country*." (NPS paragraph 3.103). 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, and would therefore responds directly

Summary of Representation	Applicant Response
floorspace associated with OxSRFI. Queries are raised regarding draft DCO Requirement 5 and the delivery of floorspace ahead of the rail freight terminal. OCC also query whether the strategic road connectivity of OxSRFI conflicts with the mode shift objectives of the NPS. 5. **DCO Drafting** – the RR includes a substantial schedule of queries and suggested changes to DCO drafting. These are outlined in **Appendix A.** 6. **Public Health** – OCC considers the HIA in its current form insufficiently robust to support decision-making and suggests further work is required on health inequalities, localised and cumulative impacts, balanced interpretation of adverse and beneficial effects, specific mitigation and monitoring. 7. **Climate Change and resilience** – the application is considered broadly compliant with relevant climate policies and targets, but OCC seek corrections and stronger commitments. Clarification is sought on a number of detailed	and positively to the stated objectives of the NPS. While accepting OxSRFI as being NPS compliant, OCC's RR is also somewhat confused regarding the need context for SRFIs which is clearly defined in the NPS, and is distinct from 'local need'. At paragraph 14 of the RR OCC appears to accept there is a national need for SRFI and a national need for NDC warehousing, but other parts of the RR also question the need for nationally significant or strategic scale warehousing. This notwithstanding, in addition to the need established by the NPS, there is a recognised need for strategic logistics in this part of the M40. OCC's representation implies that should other nearby proposed distribution sites be approved (such as those by Albion Land and Tritax near Baynards Green, currently subject to appeal following refusal by CDC) the OxSRFI scheme might theoretically only need to consist of a rail freight terminal (RR paragraph 16). Such an approach would not be consistent with the Planning Act 2008 definition of an SRFI, nor be NPS compliant, as 'warehousing' is an integral part of an SRFI. Aligned with the NPS, the Applicant's market evidence is clear regarding the need for large-scale or XXL warehousing, whereas the evidential basis for some of OCC's narrative regarding need is unclear. **'Scale'** - As set out in the submitted DAD – Main Site (Document 5.5A/**APP-166**), the scale of development was the result of an extensive iterative design process, taking account of site constraints and opportunities, with consideration, amongst other matters, of landscape and visual issues directly informing development parameters and the nature and scale of mitigation proposed. The proposals are necessarily seeking to maximise the economic benefits of this proposed nationally significant infrastructure whilst minimising environmental and other potential harms. OCC's wider concerns regarding the trigger for the rail freight terminal being operational are noted, but the comparisons to Northampton Gateway as an example of this not being necessary are misplaced. At Northampton the approved DCO was amended by the Secretary of State in 2023 (see **Appendix C**) to provide the flexibility to occupy warehousing before the terminal was 'available for use' because in the absence of that flexibility there were major challenges in securing the investment required by site occupiers and funders. At Northampton, as at OxSRFI, the final connections to the main rail network are beyond the control of the Applicant and rest with Network Rail who are not able to define and fix specific dates for delivery of their part of the infrastructure. The proposed approach via Requirement 5 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. In practice, the Northampton connections were delivered ahead of any buildings, and the terminal began operations, while construction of the first buildings was ongoing, but this should not be misinterpreted

Summary of Representation	Applicant Response
points and elements of the proposals including re: carbon management and energy strategies. OCC's main transport related point focuses on the absence of hydrogen refuelling which is viewed as a missed opportunity. The RR includes numerous detailed points or queries regarding energy generation on-site, assessments of embodied carbon, and compliance with Part L of Building Regulations. 8. **Flooding & Drainage** – The OCC representation is split into two parts, the first from the Lead Local Flood Authority (LLFA) relating to the main site and the second part from the Local Highways Authority, relating to the offsite highways works. The **LLFA** RR includes extensive detailed points on various elements of the assessment and strategy submitted with the Application, many of which are seeking clarification from the Applicant including some methodological issues regarding the appropriate standards applied, proposed run-off rates, and regarding data sources used. Concerns include with regard	as meaning warehousing is not required as part of a SRFI scheme. Without the warehousing a scheme would not accord with the Planning Act 2008 nor meet the NPS policy, nor be commercially attractive. **5.** **DCO Drafting** – Having previously sought and encouraged comments from OCC on the draft DCO the Applicant welcomes the input now received. The Applicant's response to OCC's detailed and numerous comments on the draft DCO are set out in the schedule at **Appendix A**. **6.** **Public Health** – the Applicant does not accept many of OCC's criticisms or concerns about the submitted Health Impact Assessment (HIA) (Document 6.12C/APP-298), and a detailed response to the comments has been provided to OCC. The approach taken follows a standard methodology which has been developed with reference to OCC's Health Impact Assessment Tool, the Oxfordshire Joint Strategic Needs Assessment (JSNA), and other relevant public health evidence sources. The methodology and baseline data has been used to inform the assessment of health determinants, identify potentially vulnerable populations and provide an evidence base for the professional judgements reached within the assessment. The overall conclusions in the HIA reflect a balanced consideration of both beneficial and adverse health determinants. Whilst some adverse health pathways have been identified, these are generally limited in their geographical extent, duration and/or magnitude, particularly following the implementation of mitigation measures. In contrast, the Proposed Development is expected to deliver a range of substantial and longer-term health benefits, including employment and skills opportunities, improved accessibility, active travel infrastructure and green infrastructure provision. Consequently, the HIA concludes no overall adverse health effects for each health determinant based on consideration of residual adverse effects not being of a scale that would outweigh the identified health benefits or materially alter the overall health outcome of the Proposed Development. The assessment therefore supports an overall beneficial health conclusion, whilst acknowledging the presence of both positive and negative health determinants within the assessment framework. The Applicant therefore rejects the suggestion that it does not enable an appropriate element of the evidence to inform decision-making. **7.** **Climate Change and resilience** – The overall agreement with the submitted application material (ES Chapter 15 and associated appendices) is welcomed by the Applicant. OCC seek some additional clarification or strengthening, however the Applicant considers that some of the comments reflect an incomplete review of the application material. The OxSRFI proposals go well beyond regulations or standard measures to deliver a range of low carbon and renewable energy initiatives, as well as energy efficiency design. However, in response the Applicant has further clarified some detailed elements of the carbon management and/or energy strategy, see points below.

Summary of Representation	Applicant Response
to how watercourse diversions have been modelled, hierarchical approach to drainage and reference to the newly published OCC guidance (Published June 2026). The **highways** specific comments largely relate to specific local requirement that should be followed as the design develops. Betterment to existing flows has been requested where works are proposed to existing highways. 9. **Socio-Economics** – OCC welcomes the proposed provision of training and apprenticeship opportunities, but identifies risks to delivery from Oxfordshire's tight labour market. OCC seeks a comprehensive Community Employment Plan covering construction and operational phases, with local training pathways, education links and support for inclusive employment. 10. **Palaeontology** – OCC consider there a risk of underestimating the potential for impacts on undesignated (and currently unknown) features. In addition to the proposed 'watching brief' OCC seeks expert involvement by the	With regards to the comments on overheating, Section 4 the Energy Strategy (Document 6.15D/**APP-304**) details design measures to minimise overheating in buildings, including passive design and ventilation measures, and active cooling systems in line with the cooling hierarchy. The Climate Change Risk Assessment (Document 6.15C/**APP-303**) assesses to a high level the potential impact of high temperatures resulting in overheating within buildings leading to worker health impacts. It is considered that adequate ventilation, building orientation, and the inclusion of green and blue infrastructure mitigate the potential impact. As such, appropriate consideration has been given to overheating at this stage in the design. A further detailed overheating assessment will be completed, as committed to within the BREEAM pre-assessment prepared for the Proposed Development, which has targeted HEA05 Thermal comfort credits. The earliest an overheating assessment could likely be completed in detail would likely be when the first set of detailed building drawings becomes available. Regarding compliance with Part L, and the requirement for the Building Emissions Rating (BER) to be lower than the Target Emissions Rating (TER), there is a formatting error within Table 21 of the Energy Strategy (Document 6.15D/**APP-304**). The values for BER and TER were mis-reported under the incorrect rating (i.e. BER values were mistakenly reported under the TER heading). This has been resolved in the response directly to OCC, and does not result in a change to the information presented within the Energy Strategy, as analysis and conclusions have used the correct values. No further update is considered to be required. Regarding comments on energy demand and fabric performance, and the suggestion that there is scope to strengthen the proposed efficiency measures: the 1% and 2% differences quoted by OCC are understood to have been calculated from the values presented in Tables 8 and 9 of the Energy Strategy (Document 6.15D/**APP-304**), reviewing the difference in the total energy use intensity under the baseline and be lean scenarios. Given unregulated energy consumption has been included within this calculation (which is unaffected by the energy efficiency measures), the percentage reductions quoted under-represent energy efficiency measures achieved regarding the regulated consumption (which is affected by the energy efficiency measures). Total building energy intensities as set out in the Energy Strategy (Document 6.15D/**APP-304**) within Tables 15 and 16 present a Be Green energy consumption of 29.55 kWh/m2 for the warehousing, and 75.92 kWh/m2 for the office space. Given the majority of the Proposed Development comprises warehousing, when considering a weighted average intensity across the site the energy consumption intensity is <37 kWh/m2, far exceeding the target set out in the Cherwell Local Plan.

Summary of Representation	Applicant Response
Applicant now to prepare a Written Scheme of Investigation for any works required. 11. **Property & Land** - does not object in principle to access arrangements affecting Ardley Fields HWRC, provided operational capacity, safe access and protective provisions are secured. OCC reserves its position on acquisition powers affecting Ardley Woods Quarry pending formal negotiations, justification of necessity and proportionality, and further information. 12. **Traffic & Transport** – The Representation confirms OCC's general level of contentment with the assessment of traffic impacts and mitigation proposed, subject to final agreement of S106 contributions. Remaining queries include wording of DCO triggers for the Phase 2 highways works, as well as agreement of contributions (sums) to some proposed mitigation (cycle works, and off-site Barley Mow junction 'monitor and manage' details). **Other issues raised:**	The Applicant does not agree with the comments made regarding ongoing monitoring and reporting of energy performance, which is committed to within the Energy Strategy (Document 6.15D/**APP-304**) and the Carbon Management Plan (Document 6.15E/**APP-305**). The base build specification for the buildings includes shadow metering of water and electricity consumption, which can then be collated and viewed by the Applicant. This will enable energy consumption to be monitored and minimised throughout the Proposed Development's lifetime. Furthermore, the Applicant will use a form of green clauses within tenant leases, where possible. Regarding the comments on the high unregulated energy demand and whether there is sufficient renewable provision: unregulated energy is often a very high figure compared to regulated energy, especially in zones such as warehouses where large portions of the development are not conditioned and so have low relative heating/cooling demand (regulated energy). As set out at section 3.7 of the Energy Strategy (Document 6.15D/**APP-304**), the Application includes delivery of on-site solar PV energy generation, and the proposed buildings will be structurally designed to allow for 100% of their available roof area to be filled with solar PV. It is not anticipated this would be provided immediately, but could be expanded over time in line with tenant requirements (i.e. with an understanding of tenant activities and associated unregulated energy consumption), thereby minimising the need to export excess generated electricity to the grid. The Applicant is currently in dialogue with SSEN to better understand wider grid capacity and national constraints regarding electricity infrastructure, but power export is not a current or primary focus for OxSRFI and so sits outside of the Energy Strategy (and the ability of the grid to accept feed-in energy is known to currently be very limited). The ability/inability of the OxSRFI scheme to export renewable energy would not impact on the emissions arising from the scheme itself, and the scheme's 'climate performance' is not contingent on this. OCC raise queries regarding embodied carbon and the ability to adhere to embodied carbon limits listed in the emerging Cherwell Local Plan. As set out within ES Chapter 15 (Climate Change) (Document 6.15/**APP-183**) and the Carbon Management Plan (Document 6.15E/**APP-305**) the Applicant is committed to achieve an embodied carbon target intensity of 350 kgCO2e/m2. This goes beyond standard best practice and exceeds the target set within the emerging Cherwell Local Plan. Regarding the comments made on HGV refuelling, the proposed development would include enabling infrastructure to ensure HGV charge points could be installed in line with demand. The Proposed Development has sought to agree a 50 MVA grid connection, which would enable the electricity demand of the warehousing to be met, alongside providing headroom to meet the demand of HGV charge points

Summary of Representation	Applicant Response
Beyond the above 12 numbered issues, OCC's RR also provides comments on other issues including: • Air Quality • Ecology & Arboriculture • Historic Environment (Archaeology) • Agricultural Land	where this arises. If approved the Proposed Development will be delivered by Mountpark Properties Limited, who currently do not have any demand for HGV charge points from their existing tenants across other schemes. As such, the enabling infrastructure is considered to future proof the site against potential future emerging demand. With regards to the provision for hydrogen vehicles, a hydrogen re-fuelling station would not be viable to include within the Proposed Development - such infrastructure is not insignificant and comes with high costs. Without clear indication of demand, and limited existing infrastructure regarding the transportation and distribution of hydrogen, the provision of such refuelling capabilities at the Proposed Development is not considered feasible. Data from the Department for Transport and Driver and Vehicle Licensing Agency presents licensed vehicles per year within the UK, broken down by fuel type. This shows that in Q1 2026, only 1.03% of HGVs were fuelled by petrol and diesel alternatives, with 98.7% being diesel fuelled. This demonstrates the currently limited demand in the market for alternative fuelling options. **8. Flooding & Drainage:** **LLFA RR (Main Site)** The Applicant's consultant met with the OCC LLFA in August 2026 to discuss and clarify the points raised within the RR. A detailed response has since been shared with OCC, a summary of which is provided here. • All flood risk sources are considered within ES Chapter 9 (Water Environment) (Document 6.9/APP-177). • It is acknowledged and accepted that OCC have published new guidance which would supersede the guide adhered to at the time of the submission. Updated guidance will inform future design development and will be secured through DCO requirements 9 and 21-22 which will require approval through the local planning authority (requirement 9) and lead local flood authority (requirements 21-22) prior to sign off of the final drainage proposals. • Local data sources pertaining flood risk have been reviewed which did not highlight any historical flooding within the order limits. • EA surface water flood mapping has been updated since the submission, however, a bespoke hydraulic modelling exercise has been undertaken for the site which is considered more representative of flood risk. • The hydraulic modelling exercise is considered conservative and has been reviewed and signed off by the EA.

Summary of Representation	Applicant Response
	• The hierarchical approach to drainage will be followed, with infiltration being preferred over a connection to the watercourse. Subject to confirmation following further ground investigation. Testing done to date confirms that an infiltration-based solution would result in a lower attenuation volume requirement and hence the submitted calculations are conservative at this stage. • Should a connection to the watercourse be pursued (in the event of infiltration not being feasible), the proposed discharge rate of 2 l/s/ha would be in accordance with previous OCC standards and in fact provides betterment over the minimum rate stated within the latest OCC and DEFRA guidance of 3l/s/ha. • It was agreed that future maintenance would be secured within the DCO and the Applicant will update Requirement 21 to reflect this. **OCC Highway works** The Applicant's consultant met with the OCC in August 2026 to discuss and clarify the highway drainage points raised within the RR. A detailed response has since been shared with OCC, a summary of which is provided here. • It is acknowledged and accepted that OCC require climate change to be applied to the lower return period storm events. At this stage attenuation has been sized to accommodate the worst case (100 year + 40%) to demonstrate the scheme can be delivered. Further, more detailed modelling will be submitted to OCC through detailed design. Requirements will be secured through DCO requirements 7 and 8. • Currently, a 50% allowance for runoff from landscaped areas has been allowed for. This is over and above the requirements of OCC which is stated to be 35%. • The proposed discharge rate for areas of existing highway improvement offers significant betterment to the existing scenario when considering peak rainfall events. OCC have requested further detail around the lower return period storm events and runoff rates. This will be provided in due course and would not fundamentally alter the submitted design. • The proposed hydraulic modelling of the local watercourse is proportionate to the study area i.e., the order limits and immediately up and downstream. • The hierarchical approach to drainage will be followed, with infiltration being preferred over a connection to the watercourse. Subject to confirmation following further ground investigation.

Summary of Representation	Applicant Response
	• The OCC local expectations with regard to the drainage design associated with new highways are acknowledged, with preference towards open SuDS features and securing appropriate maintenance. OCC design guide will inform future design development. **9.** **Socio-Economics** – the Applicant notes the emphasis of the RR on securing local skills and training benefits, and sees this as well aligned with the proposed outcomes from the Employment & Skills Plan secured by the draft DCO (Requirement 31) (Document 3.1/**APP-139**). **10.** **Palaeontology** – The Applicant has previously discussed OCC's suggestion that a draft WSI is set out now, with specialist Palaeontological advice, in case dinosaur footprints are found on-site during construction. Given the very limited areas of appropriate geology which will be disturbed on-site, the Applicant remains of the view that the low probability of such finds makes this unnecessary at this stage. 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 effects on the nearby SSSI including a proportionate approach via a watching brief for relevant areas of earthworks. **11.** **Property & Land** – the generally positive comments are noted. Dialogue regarding Land and Property issues was ongoing at the time of the RR and remains so. **12.** **Traffic & Transport** – The positive RR with regard to Traffic and Transport issues is welcome and follows extensive and long-running constructive dialogue and collaborative working by the Applicant with OCC Highways and National Highways through the Transport Working Group (TWG). Dialogue regarding detail of S106 contributions, and DCO drafting is ongoing at the time of the Applicant's comments on the RR. The Applicant shares OCC's optimism that the final outstanding queries referred to will be resolved. The Applicant has agreed a series of minor changes to the submitted application which address many of the outstanding concerns, these include amendments to certain speed limits, traffic calming measures on Ardley Road, implementation of the A4095/B4030 roundabout improvements, construction traffic routeing, and walking & cycling routes across the Main Site. These changes will form part of the change request – as explained in the Applicant's Procedural Deadline A submission (cover letter) the Applicant intends to provide an update on the timing for submission of the change application request at the Preliminary Meeting.

Summary of Representation	Applicant Response
	The Stage 1 RSA brief has been approved by OCC 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. The departures from standard are in progress and all of those related to the road layout/geometry are currently with OCC for formal review. **Other issues raised**: **Air Quality** – The six-month and three-month project-specific nitrogen dioxide (NO_2) monitoring surveys were undertaken to supplement Local Authority air quality monitoring data in establishing baseline air quality conditions in the vicinity of the site and study area. The monitoring data were annualised in accordance with DEFRA's Local Air Quality Management Technical Guidance (LAQM.TG22), thereby accounting for seasonal variations and providing an estimate of annual mean concentrations. **Archaeology** – the archaeological mitigation strategy (including WSI) was provided to Oxfordshire County Archaeology Services and approved via email on the 13th July 2026. The agreed strategy replaces the version submitted with the Application in March 2026 and is submitted with the Applicant's Procedural Deadline A submission. Schedule 16 of the dDCO will be updated at Deadline 1 to reflect this version. **Ecology & Arboriculture –** OCC suggest a 50m buffer from Ancient Woodland in line with guidance produced by the Woodland Trust. The Woodland Trust publication 'Planning for Ancient Woodland: Planners' Manual for Ancient Woodland and Veteran Trees ' 2019 recommends *"As a precautionary principle, a minimum 50 metre buffer should be maintained between a development and the ancient woodland"*, it should however be acknowledged that this is a 'precautionary' buffer with Government Guidance on Ancient woodland, ancient trees and veteran trees: advice for making planning decisions, stating that "*For ancient woodlands, the proposal should have a buffer zone of at least 15 metres from the boundary of the woodland"* but also acknowledging that *"The size and type of buffer zone should vary depending on the: scale and type of development and its effect on ancient woodland, ancient and veteran trees and ; character of the surrounding area".* The Woodland Trust publication also state that *"there is no 'one size fits all"* with buffer design, each one should be designed to fulfil the specific requirements of its location and the type of proposed development' and a smaller buffer can be appropriate if *"the applicant can demonstrate very clearly how a smaller buffer would suffice"*.

Summary of Representation	Applicant Response
	As stated in the response to CDC comments, 15m buffers have been provided to both Kennel Copse and Burntclose Copse with the proposals identifying no impacts including potential hydrological changes which are likely to extend beyond the standard 15m distance and as such there is no evidence to suggest that an extended precautionary buffer should be provided to avoid any potential adverse impact to Ancient Woodland. It should also be noted that while a 15m buffer from the Ancient Woodland has been shown, development is shown at a much greater distance from the parcels of Ancient Woodland. The Applicant considers the 15m buffer proposed to be sufficient to avoid any adverse impact to the Ancient Woodland.