Submission ID: S9ED1D920

I would like to comment on 3 issues:
A)PFAS /Forever Chemicals Contamination:
The Inspector rhetorically asked whether this issue was another Asbestos-equivalent crisis. I would respond that absolutely, it is an equivalent
• PFAS is highly toxic and is linked to a range of serious health conditions including cancer, immune suppression, liver and thyroid damage, high cholesterol and developmental issues in children.
• PFOS and PFOA are banned worldwide and classed as carcinogenic.
• People living near PFAS hotspots tend to have elevated levels of PFAS in their blood (recent examples are Bentham and Thornton-Cleveleys).
• PFAS is highly mobile and spreads in a plume of up to 10 km through air, soil, ground and surface water.
• Extremely high levels of PFAS have been found in 9 streams flowing from the former RAF Upper Heyford base (now Heyford Park) by the Environment Agency and environmental consultants BWB and Subadra. The highest was 42,174 nanograms per litre. This is thousands of times over the Environmental Quality Standard and significantly higher than other known PFAS hotspots such as RAF Fairford and the National Fire Service College.
• Groundworks for OXSRFI risk disturbing PFAS contamination and exposing the public and site workers.
• Two of the contaminated streams, tributaries of the Padbury and Gagle Brook, flow through the OXSRFI site.
• Former airfields with fire training areas like RAF Upper Heyford are well documented PFAS hotspots, owing to large quantities of AFFF firefighting foams contaminating soil and waste-water runoff.
• Historic MOD documents obtained by Calum Miller MP recently confirmed that firefighting foam was ‘washed down the drain’ at RAF Upper Heyford.
• Potential PFAS contamination in the area has been acknowledged by the 2021 Hydrock Ground Conditions report produced for OXSRFI and by Cherwell District Council in an email from Shawn Fleet.
• Risk assessments emphasise protecting the Principal Aquifer under the site, the Great Oolite Limestone Formation, which stretches for 200 miles across the south of England.
• However, no testing for PFAS has ever been carriedout either at the OXSRFI site, or at Heyford Park.
• The Fire Training Area has never been remediated, despite this being recommended by the Planning Inspectorate in 2009, at the planning appeal for the initial redevelopment of the RAF Upper Heyford site.
• The National Planning Policy Framework requires developers to show that the risks from contamination are not unacceptable prior to permission being granted. In order to decide on the risks, extensive testing for PFAS including an intrusive ground investigation and controlled waters assessment, will be necessary.
B)Cumulative Impact on Traffic and Infrastructure
Summary:
· Massive Cumulative Impact of major developments in small area
· Unsupportable impact on Traffic and Infrastructure
· 50 million extra vehicle movements pa plus 57,000 extra people
· Baynards Green roundabout already over-capacity at 160%
· Resulting rat-running through Bainton threat to grandchildren’s’ lives
My wife and I object to this development because of the horrific CUMULATIVE IMPACT on our already congested local roads and infrastructure and request that you dismiss this proposal.
These local roads are, according to Cherwell District Council’s own measurements in their Local Plan, ALREADY the worst in the whole of Cherwell -particularly the Baynards Green roundabout at 160% of capacity in the AM Peak period
Whenever there are road problems on the A43 or M40 which happen far too frequently now, the knock-on impact is immediate. They cause even worse congestion in the area and dangerous rat-running through the local villages. Bainton has a single track road with several blind bends and a water splash. Our 11 grandchildren regularly bicycle along these normally quiet deserted side roads and now their lives are at risk from the worsening rat-running.
IN THE FUTURE, traffic flows will be made even worse by the advent of the several very large development proposals in the immediate area, none of which are in the draft Local Plan. In particular, the Puy du Fou French theme park pulling in 1.45 million visitors pa onto the B4100 road, the Heyford Park housing development for an additional 9,000 houses, the OxSRFI rail depot at Ardley employing 9,600 workers, plus these Baynards Green warehouses operating 24 hours per day.
In the future, the CUMULATIVE EFFECT from all these major developments in the immediate area is exceptional. According to their documents, they will produce a staggering 50 million extra vehicle movements pa (136k extra per day).
We can share this detailed analysis with you if required
The proposed traffic fix for these warehouses at Baynards Green is a mere tinkering of this cumulative issue.
Just merely judging an individual development on its merits is no longer sufficient.
In the context of so very many large development schemes being proposed in such a small area, we respectfully ask the Inspector to seriously consider the combined effect from these cumulative schemes and reject the proposal. This is an exceptional situation requiring exceptional consideration and judgement.
C) Bicester Transport Model
The BTM is out of date and incorrect, thereby invalidating the assumptions made in the applicant's transport assessment.
Measures Required to Demonstrate Fitness for Purpose with WebTAG
To demonstrate fitness for purpose in accordance with WebTAG:
• Trip matrices should be demonstrated to reasonably represent existing
origins, destinations and movements across the Heyford area including HGV and through traffic movements; the prior matrices should be validated; the widespread and significant changes to the matrices outside WebTAG criteria limits arising from matrix estimation should be addressed in accordance with WebTAG; the resulting matrices should be validated using appropriate cordons and screenlines capable of testing their reliability within the area
• Network and route assignment should adequately represent the roads,
junctions and constraints affecting route choice, and demonstrate that traffic is reliably assigned across the local road network.

• Independent validation should use adequate observed data across the roads and villages for which the model is being relied upon, including link and turning counts and journey times on relevant routes and key network constraints, with sufficient data to test HGV movements.

The deficiencies outlined in this assessment reveal systemic faults in the BTM Heyford Park Model Update and failures to comply with WebTAG requirements.

Revalidation of the existing BTM 2016 base model against traffic counts will not remedy these underlying deficiencies or demonstrate compliance with WebTAG.

The model should therefore be substantively corrected through rebasing or equivalent reconstruction of the model base, followed by recalibration and independent validation, before it can be demonstrated to be fit for purpose and compliant with WebTAG.

**Validation should be the test of the corrected model, not the substitute for correcting it

This is because a model can subsequently match observed traffic counts while retaining incorrect underlying trip patterns, undermining the reliability of future traffic forecasts and route assignment. This is why matrix validation should be in accordance with WebTAG guidance.

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