Submission ID: SC9A2C2A9

Having been unable to speak in detail, even though we had registered as an Organisation, NORA wishes to summarise the main concerns that the application projects on the local residents or North Oxfordshire.
One of our central concerns is that no single organisation has responsibility or authority for assessing the combined impacts of this development and others within a 5 mile radius. We have called for a coordination of the infrastructure and mitigation required, submitting our report to local Government and a North Oxfordshire Cumulative Impacts and Infrastructure Board to be formed. Value Retail also raised concerns re.cumulative impact, as did other organisations present on day one (ISH1).
To date, the applicant has not been able to provide sufficient consideration of cumulative impact on traffic, pollution, visual impact and loss of farmland.
Another huge concern of ours is The Mountpark Team have acknowledged that there is a serious PFAS problem at Heyford Park, with soil and water heavily polluted. NORA wishes to highlight the seriousness of the situation and calls for in depth testing of soil and water for these reasons:
1. High Toxicity and Severe Health Risks of PFAS
PFAS (per- and polyfluoroalkyl substances) are highly toxic synthetic chemicals linked to a wide array of severe medical conditions. These include multiple forms of cancer, immune system suppression, liver and thyroid damage, elevated blood cholesterol, and adverse developmental issues in children. Globally recognised contaminants like PFOS and PFOA are banned internationally due to their confirmed carcinogenic nature. In areas with high exposure, communities show direct biological impacts: residents living near documented PFAS hotspots—such as Bentham and Thornton-Cleveleys—exhibit significantly elevated levels of PFAS in their bloodstream.
2. Severe Off-Site Contamination from RAF Upper Heyford
Former airfields utilising aqueous film-forming foam (AFFF) for fire training are well-established contamination points. Historic Ministry of Defence documents reveal that firefighting foam was routinely washed directly down drains at the former RAF Upper Heyford base (now Heyford Park). Environmental investigations by the Environment Agency alongside consultants BWB and Subadra identified extremely high PFAS concentrations across nine streams flowing from the site. Peak levels reached 42,174 nanograms per liter—thousands of times above the Environmental Quality Standard and far exceeding other prominent UK hotspots like RAF Fairford and the National Fire Service College.
3. Direct Contamination Threats to OXSRFI and Regional Water Supplies
PFAS compounds are exceptionally mobile, capable of migrating up to 10 kilometres through air, soil, groundwater, and surface runoff. The proposed Oxfordshire Strategic Rail Freight Interchange (OXSRFI) sits directly in the path of this contamination, with two polluted tributaries (feeding into Padbury and Gagle Brook) flowing straight through the development site. Unmitigated groundworks risk disturbing contaminated soil and water, directly exposing both site workers and the surrounding public. Crucially, the site lies above the Great Oolite Limestone Formation—a designated Principal Aquifer spanning 200 miles across southern England that requires rigorous protection.
4. Regulatory Non-Compliance and Unaddressed Testing Deficits
Despite potential contamination being explicitly acknowledged in the 2021 Hydrock Ground Conditions report for OXSRFI and confirmed via Cherwell District Council correspondence, no actual PFAS testing has ever taken place at either the OXSRFI site or Heyford Park. Furthermore, the original Fire Training Area remains completely unremediated, ignoring explicit recommendations made by the Planning Inspectorate during a 2009 planning appeal. Under the National Planning Policy Framework (NPPF), developers must demonstrate that contamination risks are acceptable before planning permission is granted—a requirement that legally necessitates immediate, intrusive ground investigations and comprehensive controlled waters assessments.