Document index

This single PDF document consolidates post-hearing materials relating to seven separate issues, with corresponding appendices.

To locate the relevant sections within this consolidated document, please refer to the guide below:

Main statements	Page number in this PDF
There is no Compelling Need for Compulsory Acquisition of land to be used for Warehousing and Ecological Mitigation	2
The proposed quantum of "XXL" warehousing is excessive	7
The existing SRFI network offers preferable alternatives to the proposed development	30
The Chiltern Line is not suitable for large-scale rail freight	32
OxSRFI would preclude the re-opening of a viable Ardley Station	35
Additional visualisations of the proposed development are required to complete the Environmental Statement	88
The site requires a robust mitigation plan for PFAS contamination	99

Appendix documents and context	Page number in this PDF
The Council's legal duties when determining planning applications on sites where PFAS contamination is known or suspected – *Legal opinion relating to "The site requires a robust mitigation plan for PFAS contamination"*	39
PFAS and land contamination at Heyford Park – information for residents – *Position of local Council on PFAS relating to "The site requires a robust mitigation plan for PFAS contamination"*	58
Oxfordshire SRFI - Technical Note 3 - Trip Generation – Analysis commissioned by the Applicant, referenced in *"The proposed quantum of "XXL" warehousing is excessive"*	68
Protests as rail freight scheme planning process starts – *For general information*	85

There is no Compelling Need for Compulsory Acquisition of land to be used for Warehousing and Ecological Mitigation[i]

To the Examining Authority,

This statement addresses the Applicant's case for compulsory acquisition of land for the proposed OxSRFI, with particular focus on parcels proposed for warehousing and ecological mitigation.

Section 122 of the Planning Act 2008 requires the Applicant to show both that the land is required for the development, or required to facilitate or be incidental to it, and that there is a compelling case in the public interest for compulsory acquisition.[1] Compulsory acquisition cannot be permitted to simply be a convenient mechanism for assembling a large commercial development site.

Government guidance[2] states that applicants should demonstrate that all reasonable alternatives to compulsory acquisition, including modifications to the scheme, have been explored, and that interference with private rights is necessary and proportionate.

The proposed warehouse component of the development is extraordinarily large, comprising up to 603,850 square metres of distribution and logistics floorspace, together with up to 201,283 square metres of mezzanine floorspace.[3] *Stop the Trojan Horse* contends that the proposed quantum of XXL warehouse development is inherently disproportionate to the requirements derived from the project's planning status as a proposed SRFI site.

Warehouse construction and Ecological Mitigation are cited as reasons for compulsory acquisition of several land parcels

The Statement of Reasons[4] identifies several parcels whose stated purpose, wholly or partially, is the construction of warehousing. These include plots 4/5, 4/7, 4/17, 4/18, 6/10, 6/13, 6/13a, 7/3, and 7/4.

The proposed compulsory acquisition of other parcels relating to ecological mitigation purposes (including 2/4, 2/4a, 2/10, 2/14, 6/17, 7/22 and 8/2) also raises the obvious question as to why land already in the Applicant's possession could not be used for ecological mitigation, providing that the proposed scheme is modified to reduce the amount of land used for XXL warehouses.

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[1] Section 122 of the Planning Act states:
(1) An order granting development consent may include provision authorising the compulsory acquisition of land only if the Secretary of State is satisfied that the conditions in subsections (2) and (3) are met.
(2) The condition is that the land
(a) is required for the development to which the development consent relates,
(b) is required to facilitate or is incidental to that development, or
(c) is replacement land which is to be given in exchange for the order land under section 131 or 132.
(3) The condition is that there is a compelling case in the public interest for the land to be acquired compulsorily.

[2] "Planning Act 2008 - Guidance related to procedures for the compulsory acquisition of land", section 8.

[3] Applicant's Market Analysis Report, Document number 7.1

[4] APP-143

Some warehousing could be provided off-site

It is also noteworthy that the Applicant's own evidence confirms that the rail terminal could serve warehouses both on and off the SRFI site[5]. In other words, a greater share of the warehouse requirements could potentially be covered by existing nearby warehouses, for example by the large existing warehouse estates near M40 junction 9, near M40 junction 11, or off the B4030 in Bicester.

Even if the extraordinary quantum of warehousing can be shown to be required for the proposed OxSRFI to function, could some of that warehouse space not be provided at existing nearby warehouse sites?

Each plot proposed for compulsory acquisition must be individually and specifically justified in relation to its rail freight function

The Applicant should be able to demonstrate what specifically would prevent the strategic rail freight function from being delivered if an individual "warehouse" or "ecological mitigation" parcel were not compulsorily acquired.

If the answer in relation to a particular parcel is that its removal would merely reduce the amount of warehouse floorspace available, the applicant would have failed to demonstrate that compulsory acquisition of that specific parcel is required to deliver the proposed Strategic Rail Freight Interchange.

The Applicant's Statement of Reasons says that it has taken a proportionate approach and seeks only the minimum amount of permanent land and rights required to construct, operate and maintain the Proposed Development[6]. *Stop the Trojan Horse* disputes this claim. As per calculations filed separately, we estimate that the proposed warehouse component of the project is between 12 and 36 times larger than what would be required to serve likely rail traffic to the site.

The current Government application guidance is explicit that a Statement of Reasons should list each plot in the Order Land and provide justification for the compulsory acquisition powers requested specifically for each plot.[7]

The Applicant must therefore demonstrate, for each parcel:

- the precise rail-freight-related function which would be lost if the parcel were removed;
- what smaller or alternative configuration of the XXL warehouse estate was considered;
- and why that alternative was rejected.

The Examining Authority must ensure proportionality between SRFI function and scope of compulsory acquisition

There is an important difference between the national benefits of providing the core SRFI function and the public-interest justification for compulsorily acquiring a particular person's land for a particular commercial use.

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[5] Applicant's Market Analysis Report, Document number 7.1

[6] APP-143

[7] https://www.gov.uk/guidance/planning-act-2008-guidance-on-preparing-an-application-part-2-application-contents - Section 5.

The Government's compulsory acquisition guidance[8] states that the applicant must demonstrate that the land is needed, that no more land than reasonably required is being taken, and that there is a compelling case in the public interest.

The existence of a national need for SRFIs therefore cannot, by itself, answer the separate question of whether every proposed land parcel needs to be compulsorily acquired.

The concern is necessity and proportionality. The proposed scheme combines a strategic rail terminal with an exceptionally large XXL warehouse estate. The Applicant[9] acknowledges that the rail terminal can serve warehousing both on site and off site, and describe the terminal as an "independent facility".

In those circumstances, the Examination should not simply move from the proposition that an SRFI is required to the conclusion that compulsory acquisition of all land proposed for warehouse development or ecological mitigation necessarily follows. The critical question for each land parcel should be what, if anything, would prevent the Strategic Rail Freight Interchange from functioning if that parcel were not compulsorily acquired.

The burden is on the Applicant to demonstrate, parcel by parcel, not merely that the land forms part of its preferred commercial masterplan, but that it is required for the development of the SRFI, is no more than reasonably required, and is supported by a compelling case in the public interest.

In the absence of that demonstration, I invite the Examining Authority to conclude that the Applicant has not met the legal standards required for compulsory acquisition of specific parcels of land, in particular relating to parcels 4/5, 4/7, 4/17, 4/18, 6/10, 6/13, 6/13a, 7/3, and 7/4 (warehousing) and 2/4, 2/4a, 2/10, 2/14, 6/17, 7/22 and 8/2 (ecological mitigation).

[8] "Planning Act 2008 - Guidance related to procedures for the compulsory acquisition of land", section 8.
[9] Applicant's Market Analysis Report, Document number 7.1

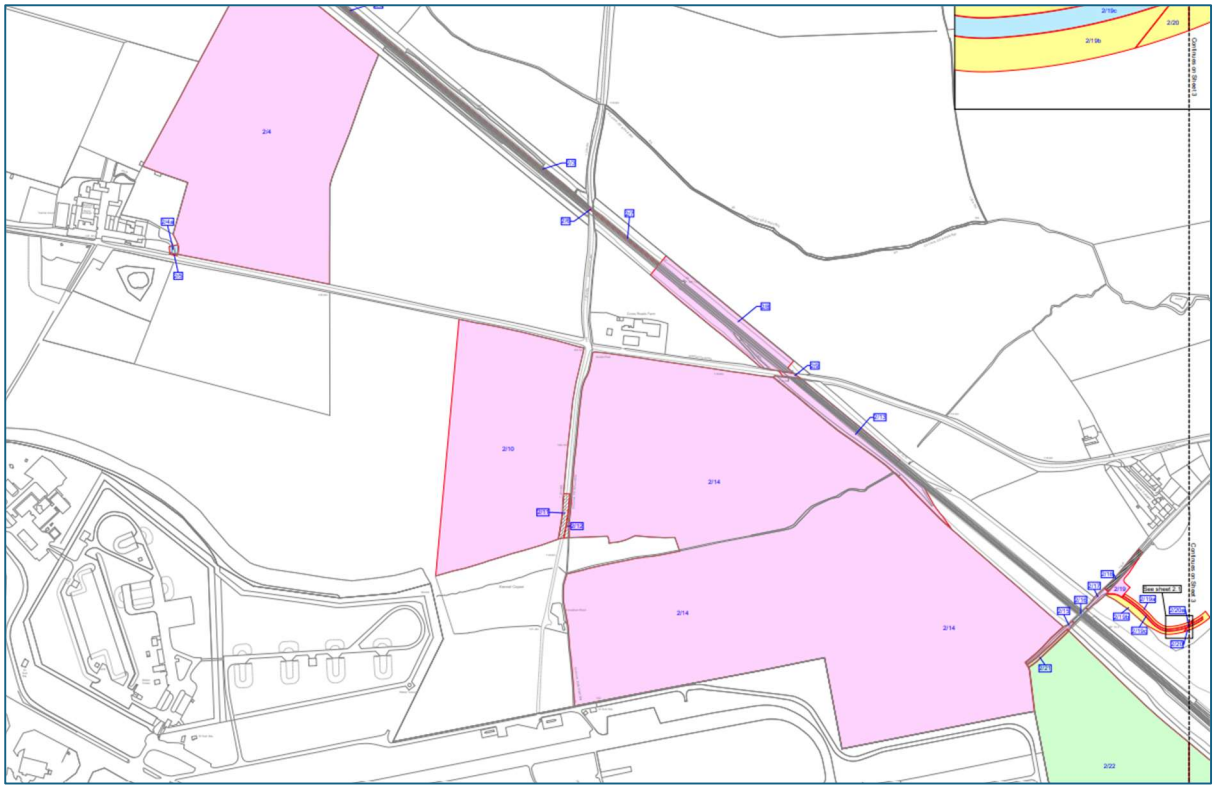


Figure 1: Compulsory acquisition of parcels 2/4, 2/10, and parts of parcel 2/14 targets land at the edge of the proposed SRFI site and particularly gives the impression of being a commercially-motivated "land grab" that could be avoided by limiting the extent of XXL warehousing and providing ecological mitigation on land already controlled by the Applicant.

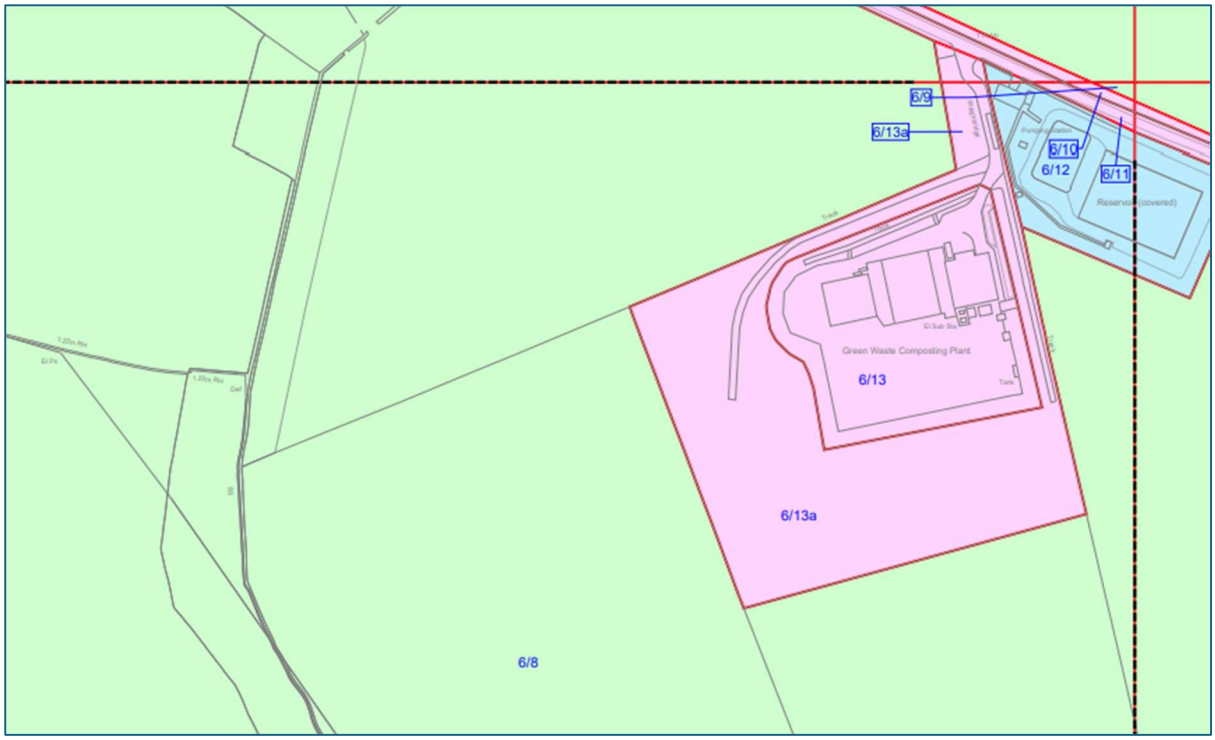


Figure 2: Compulsory acquisition of parcels 6/13 and 6/13a (Biffa composting site) for XXL warehousing use is particularly difficult to justify, considering its distance of over 1 km from the rail freight terminal, and the societal utility of the current composting facility.

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[i] *Artificial Intelligence Disclosure: AI tools, mainly ChatGPT, were used in researching the topics discussed in this note and for drafting an initial version of this document.*

The proposed quantum of "XXL" warehousing is excessive[i]

To the Examining Authority,

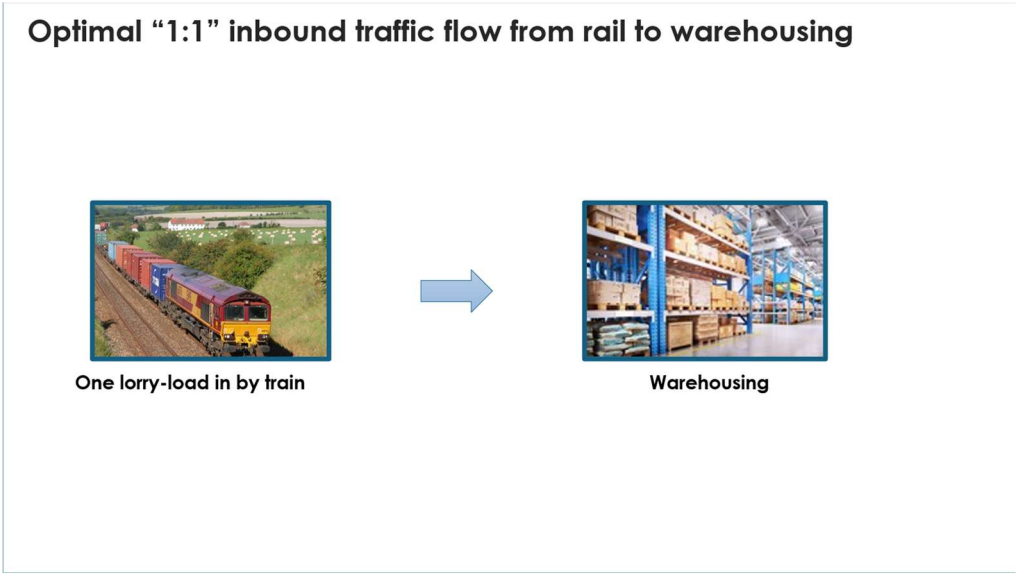
The National Networks National Policy Statement[1] begins from the premise that there is a compelling national need for Strategic Rail Freight Interchanges, and that need deserves substantial weight.

The key question now before this examination is whether the proposed 604,000-square-metre XXL warehouse estate is proportionate to the rail operation it is expected to support.

Quantifying rail-linked warehousing requirements

The National Policy Statement explains that SRFIs exist to maximise the long-haul trunk journey by rail while minimising the final road distribution leg[2].

In other words, an SRFI would ideally receive its warehouse inputs entirely by rail: The goods would be delivered to the site by train, stored and processed in a warehouse, before then being distributed to its end user by lorry.



The applicant has designed the rail terminal to be able to handle up to twelve trains per day, with four trains per day expected to be operating in the opening-year. While constraints on the Chiltern Line raise important questions concerning those projections, let us – in this context – accept them at "face value".

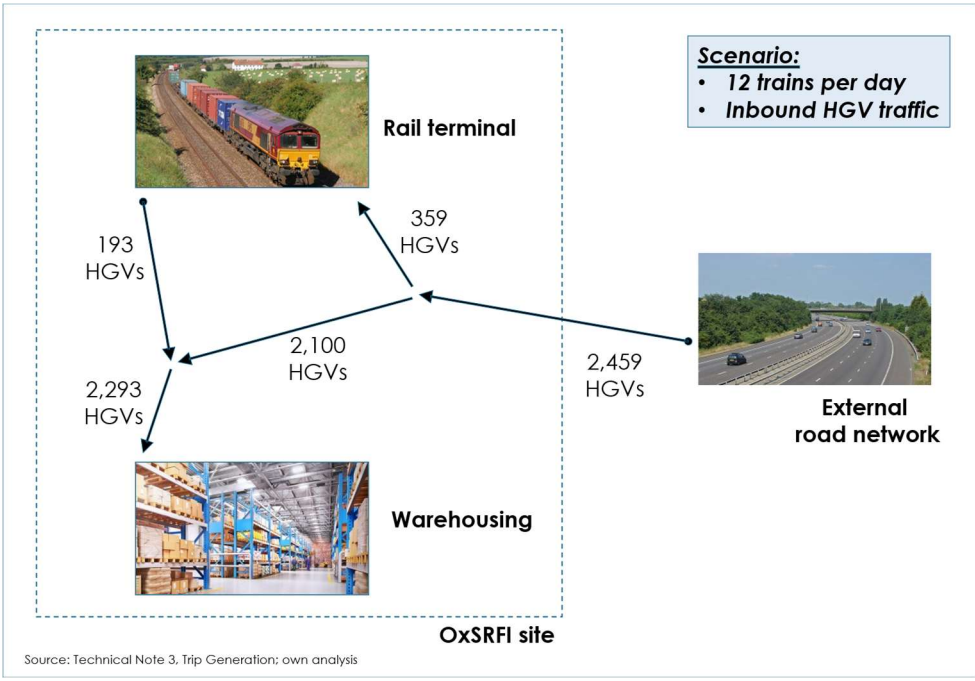
The applicant's Transport Assessment contains estimates of the impact on the road network: The development is forecast to generate external 4,920 HGV movements every single day[3]. The applicant has also calculated that those twelve trains would replace the equivalent of 1,104 HGV movements per day.[4]

However, detailed review of the Applicant's underlying analysis[5] reveals that only 35% of inbound containers will require processing on-site; the remaining 65% are expected to go directly to external recipients.

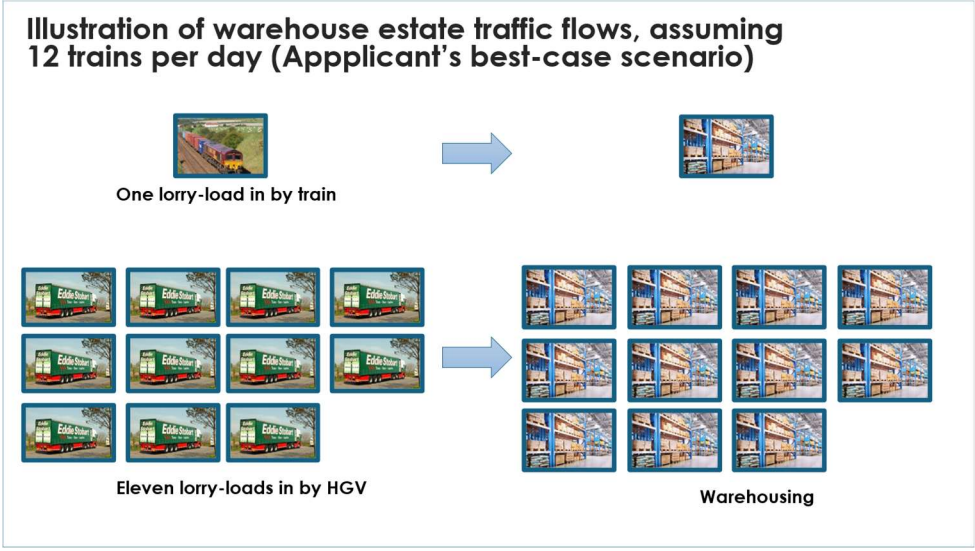
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[1] National Networks National Policy Statement, March 2024
[2] National Networks National Policy Statement, March 2024, paragraph 2.15
[3] DCO Submission, Environmental Statement, Chapter 3: Transport, Document 6.3, Table 3.26
[4] DCO Submission, Environmental Statement, Chapter 3: Transport, Document 6.3, Paragraph 3.5.36
[5] Environmental Statement, Chapter 3: Transport. Appendix 3.30: Technical Note 3: Trip Generation

Using this additional information, it is possible to map out[6] the detailed flows of inbound freight, as envisioned by the Applicant:



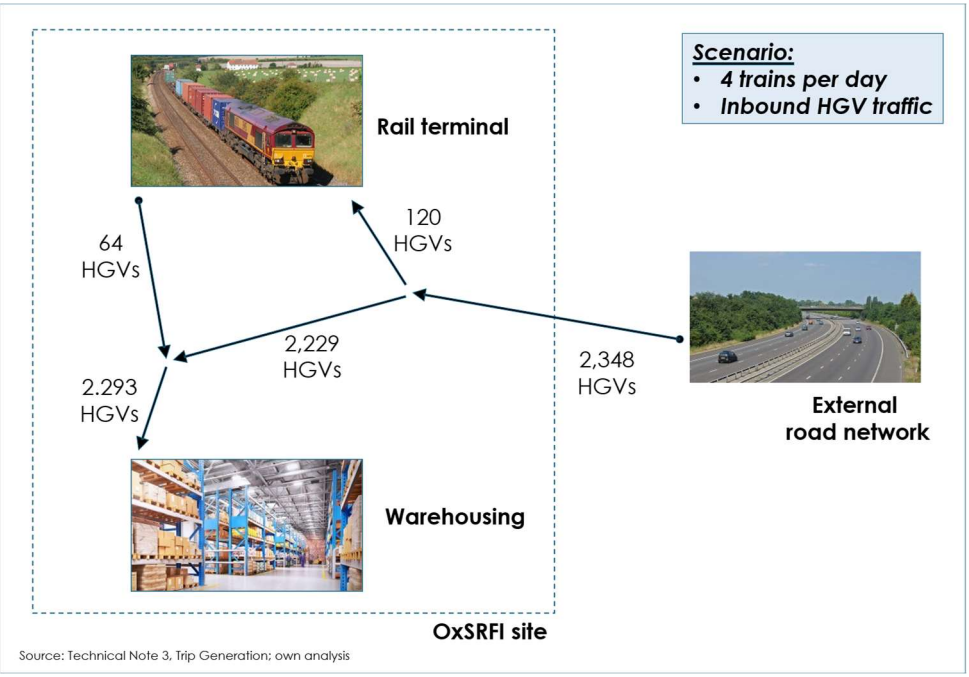
Assuming the applicant's most optimistic scenario of twelve freight trains per day, 2,293 HGV loads would arrive at the warehouses each day, with 2,100 originating from the external road network, while only 193 loads would have originated from the rail terminal. The implication is that for every one HGV load arriving at the warehouses by train, there would be eleven HGV loads arriving by road.



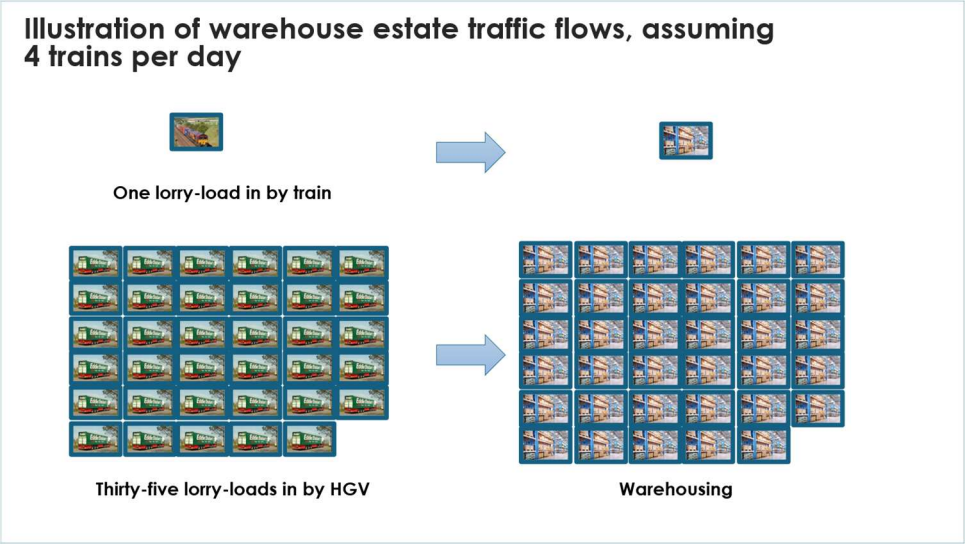
<u>Even in a best-case scenario for rail freight, the proposed warehouse estate is 12 times larger than train movements alone can justify</u>.

If more conservatively assuming four incoming trains per day, the proposed warehouse estate is oversized by a factor of 36, with just 64 inbound warehouse movements from trains against 2,229 inbound warehouse movements by road.

[6] Please refer to the appendix for detailed calculations, based on data extracted from Technical Note 3.



In illustrative form:



Of course, there is no guarantee that the site would receive twelve trains per day, or even four. Inbound freight traffic remains purely speculative, with no firm commercial commitments made by any party. At lower levels of train traffic, the disproportionality between warehouse estate size and expected train traffic will be even greater.

The Applicant has made clear that the proposed "XXL warehousing" estate targets a UK-wide market, rather than the needs of regional rail-to-road transfer

By its own admission, the intended target of the XXL warehousing facility is "national warehousing":

> *The M40 corridor around Bicester is a strategic and highly attractive area for logistics and distribution development. It has the locational attributes to meet the needs of logistics operators with retailers and distribution companies preferring to focus their national warehousing in areas with very good access to*

markets across England, and it has the particular advantage of being a location which can serve the London market.[7]

This intention is further reinforced by the Applicant's Statement of Reasons[8], which states:

The OxSRFI location means freight transit within 4.5 hours of a large proportion (75%) of the UK population.

In other words, this "XXL" site has clearly been designed to serve a national (rather than regional) warehousing market, from which the applicant envisions inbound and outbound HGV journeys of up to 4.5 hours.

However, the National Planning Statement explicitly makes clear:

The aim of a strategic rail freight interchange (SRFI) is to optimise the use of rail in the freight journey by maximising the long-haul primary trunk journey by rail and minimising some elements of the secondary distribution (final delivery) leg by road [...][9]

In addition to the requirement to maximise the rail distribution element, the NNP makes clear that SRFIs should also be "[...] minimising land take" [10].



Figure: Diagram produced by the applicant during the consultation phase (OxSRFI-Boards_V16_Web.pdf) suggests that the OxSRFI warehouse site will be a national distribution facility from which HGV-based distribution will serve customers as far away as Cornwall and even Scotland. There are of course already existing SRFIs in Scotland.

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[7] OxSRFI-Boards_V16_Web.pdf
[8] Statement of Reasons, Regulation 5(2)(h), Document Reference: 4.1, paragraph 3.15
[9] National Networks National Policy Statement, March 2024, paragraph 2.15
[10] National Networks National Policy Statement, March 2024, paragraph 5.32

Conclusions

A key planning requirement for a site to be designated as an SRFI is that it is technically capable of receiving at least four trains per day[11]. While the National Policy Statement does not explicitly give a *maximum* size of the accompanying warehouse facilities, the mere existence of rail facilities must never become a *carte blanche* to pave over an unlimited area with warehouses. A project should not be approved under the SRFI framework unless there is clear evidence of *proportionality* between expected rail traffic and overall project scope.

The applicant has not demonstrated that a 604,000-square-metre XXL logistics estate, supported by extensive highway infrastructure, is proportionate to likely rail freight to the site. So far, the applicant's justification for the proposed size of the estate rests mainly on 1) land availability, 2) high demand for XXL warehousing sites and 3) top-line comparisons to different SRFI projects elsewhere in the country.

Implied relationship between freight delivered to warehouses by road and by train

Scenario	Loads delivered to warehouses by road	Loads delivered to warehouses by train	Ratio between incoming road freight and rail freight for warehouses	Percentage of freight into warehouses by rail
12 trains per day	2,100	193	11 : 1	8 %
4 trains per day	2.229	64	35 : 1	3 %

Source: Technical Note 3, Trip Generation; own analysis

Meanwhile, the applicant's own materials show that the proposed warehousing is at least 12 times larger than what is directly required for rail freight distribution needs, that only three to eight percent of inbound freight would arrive by rail, and that the warehouse site is intended to serve HGV destinations up to 4.5 hours away.

Even allowing 50% of warehouse inputs to arrive by road (Rail: 50%), or even 80% arriving by road (Rail: 20%), the proposed quantum of warehousing still looks excessive:

[11] National Networks National Policy Statement, March 2024, paragraph 4.89

The XXL warehouse estate is greatly oversized for rail freight needs

Scenario	With 100% rail-sourced freight requirement, the XXL warehouses are oversized by this factor	With 50% rail-sourced freight requirement, the XXL warehouses are oversized by this factor	With 20% rail-sourced freight requirement, the XXL warehouses are oversized by this factor
12 trains per day	12 times	6 times	2 times
4 trains per day	36 times	18 times	7 times

Source: Technical Note 3, Trip Generation; own analysis
Note: Stated as ground-level floor space; mezzanine space would be additional

Using the information in Technical Note 3, it is also possible to calculate the quantum of warehousing space that would be required if a particular share of rail-sourced freight input is required:

The Applicant's proposed XXL warehouse estate is grossly disproportionate to OxSRFI rail freight needs

Scenario	100% rail-sourced freight would require…	50% rail-sourced freight would require…	20% rail-sourced freight would require…	Applicant's proposal
12 trains per day	51,000 m^2	102,000 m^2	254,000 m^2	604,000 m^2
4 trains per day	17,000 m^2	34,000 m^2	85,000 m^2	604,000 m^2

Source: Technical Note 3, Trip Generation; own analysis
Note: Stated as ground-level floor space; mezzanine space would be additional

The National Policy Statement requires this examination to apply a project-level proportionality test[12], and the evidence before this examination points to a clear conclusion: The plan is not a Strategic Rail Freight Interchange as envisioned in the National Policy Statement, it is a Trojan Horse for an XXL warehouse estate, overwhelmingly served by lorries.

On this basis, I urge the Examining Authority to *Stop the Trojan Horse* and reject the proposed development.

[12] National Networks National Policy Statement, March 2024, paragraph 1.4

APPENDIX 1: Summary charts



Rail terminal

193 HGVs

359 HGVs

2,100 HGVs

2,293 HGVs

2,459 HGVs



External road network



Warehousing

OxSRFI site

Scenario:

- *12 trains per day*
- *Inbound HGV traffic*

Source: Technical Note 3, Trip Generation; own analysis



Rail terminal

8 %

15 %

85 %

93 %

100 %



External road network



Warehousing

OxSRFI site

Scenario:

- *12 trains per day*
- *Total HGV traffic*
- *Percentage of external HGV traffic*

Source: Technical Note 3, Trip Generation; own analysis



Rail terminal

64 HGVs

120 HGVs

2,229 HGVs

2.293 HGVs

2,348 HGVs



External road network



Warehousing

OxSRFI site

Scenario:

- ***4 trains per day***
- ***Inbound HGV traffic***

Source: Technical Note 3, Trip Generation; own analysis



Rail terminal

3 %

5 %

95 %

98 %

100 %



External road network



Warehousing

OxSRFI site

Scenario:

- *4 trains per day*
- *Total HGV traffic*
- *Percentage of external HGV traffic*

Source: Technical Note 3, Trip Generation; own analysis

Implied relationship between freight delivered to warehouses by road and by train

Scenario	Loads delivered to warehouses by road	Loads delivered to warehouses by train	Ratio between incoming road freight and rail freight for warehouses	Percentage of freight into warehouses by rail
12 trains per day	2,100	193	11 : 1	8 %
4 trains per day	2.229	64	35 : 1	3 %

Source: Technical Note 3, Trip Generation; own analysis

The Applicant's proposed XXL warehouse estate is grossly disproportional to OxSRFI rail freight needs

Scenario	100% rail-sourced freight would require…	50% rail-sourced freight would require…	20% rail-sourced freight would require…	Applicant's proposal
12 trains per day	51,000 m^2	102,000 m^2	254,000 m^2	604,000 m^2
4 trains per day	17,000 m^2	34,000 m^2	85,000 m^2	604,000 m^2

Source: Technical Note 3, Trip Generation; own analysis
Note: Stated as ground-level floor space; mezzanine space would be additional

The XXL warehouse estate is greatly oversized for rail freight needs

Scenario	With 100% rail-sourced freight requirement, the XXL warehouses are oversized by this factor	With 50% rail-sourced freight requirement, the XXL warehouses are oversized by this factor	With 20% rail-sourced freight requirement, the XXL warehouses are oversized by this factor
12 trains per day	12 times	6 times	2 times
4 trains per day	36 times	18 times	7 times

Source: Technical Note 3, Trip Generation; own analysis
Note: Stated as ground-level floor space; mezzanine space would be additional

APPENDIX 2: Detailed underlying calculations

12-Train Scenario

Rail Terminal HGV trips

Data point		Source / comment
Maximum trains per day	12	Technical Note 3, Trip Generation, Page 14
Containers carried per train	41	Technical Note 3, Trip Generation, Page 14
Rail Terminal HGV trips required		
Inbound HGV trips generated per train (to rail terminal)	46	Technical Note 3, Trip Generation, Page 14
Outbound HGV trips generated per train (from rail terminal)	46	Technical Note 3, Trip Generation, Page 14
Inbound+outbound HGV trips generated per train	92	Technical Note 3, Trip Generation, Page 14
Mode shift		
Mode shift from long-haul road, inbound, daily	552	Technical Note 3, Trip Generation, Page 14
Mode shift from long-haul road, outbound, daily	552	Technical Note 3, Trip Generation, Page 14
Total mode shift from long-haul road, daily	1104	Technical Note 3, Trip Generation, Page 14
Destination of HGV traffic generated by rail terminal		
Remain on site, to and from warehousing	35%	Technical Note 3, Trip Generation, Page 16
To and from the hinterland	65%	Technical Note 3, Trip Generation, Page 16
Total	100%	
HGV trips from rail terminal into the integrated warehouse site	193	Technical Note 3, Trip Generation, Page 16
HGV trips from the integrated warehouse site to the rail terminal	193	Technical Note 3, Trip Generation, Page 16
Inbound+outbound HGV trips from rail terminal, into or from integrated warehouse site	386	Technical Note 3, Trip Generation, Page 16
HGV trips from rail terminal into the hinderland	359	Technical Note 3, Trip Generation, Page 16
HGV trips from the hinderland into the rail terminal	359	Technical Note 3, Trip Generation, Page 16
Inbound+outbound HGV trips from rail terminal, into hinderland	718	Technical Note 3, Trip Generation, Page 16

12-train scenario

Warehousing-related HGV trips

Daily Heavy Vehicle Trip Generation for B8 (warehousing) uses; no interaction with rail terminal		
Arrive	2,293	Technical Note 3, Trip Generation, Page 12
Depart	2,296	Technical Note 3, Trip Generation, Page 12
Either-way ("2-way")	4,589	

Total HGV trips for the whole development (freight terminal + warehousing)

Daily HGV arrivals	2,459	Technical Note 3, Trip Generation, Page 18
Daily HGV departures	2,461	Technical Note 3, Trip Generation, Page 18
Total daily HGV either-way ("2-way") trips	4,920	

Trips inferred/summarised for 12-train scenario

		Percent	
HGVs entering the site from the road network	2,459	100%	
Number of which go directly to the rail terminal	359	15%	
Number of which go directly to the warehouses	2,100	85%	
Traffic to warehouses from rail terminal	193	8%	
Total trips arriving at warehouses	2,293	93%	Matches total arrivals in technical note.
HGVs exiting warehouses	2,296	93%	
HGVs going directly from warehouses to rail terminal	193	8%	
Number of HGVs originating from warehouses exiting the site	2,103	85%	
Number of HGVs originating from rail terminal exiting the site	359	15%	
Total HGVs exiting the site to the road network	2,462	100%	Matches total departures in technical note (within +1)

12-train scenario

Aggregate figures		
External road network HGVs	4,921	100%
HGVs External road network to/from rail terminal	718	15%
HGVs from/to warehouses entering/exiting the site	4,203	85%
Rail terminal to/from warehouses	386	8%
HGVs entering or leaving warehouses (from any source)	4,589	93%

For every 1 HGV-load arriving by train, there will be... 11 ...HGV loads arriving on the road network

Warehouse freight input by rail 8%

Required size of warehouse estate

	Warehouse freight input by rail	Warehouse area	Warehouse area, rounded	"Oversize ratio"	Total HGV warehouse arrivals
Applicant's proposal	8%	603,850	604,000		2,293
Scenario	100%	50,869	51,000	12	193
Scenario	50%	101,739	102,000	6	386
Scenario	20%	254,347	254,000	2	966

4-Train Scenario

Rail Terminal HGV trips

Data point		Source
Maximum trains per day	4	Technical Note 3, Trip Generation, Page 14
Containers carried per train	41	Technical Note 3, Trip Generation, Page 14
Rail Terminal HGV trips required		
Inbound HGV trips generated per train (to rail terminal)	46	Technical Note 3, Trip Generation, Page 14
Outbound HGV trips generated per train (from rail terminal)	46	Technical Note 3, Trip Generation, Page 14
Inbound+outbound HGV trips generated per train	92	Technical Note 3, Trip Generation, Page 14
Mode shift		
Mode shift from long-haul road, inbound, daily	184	Technical Note 3, Trip Generation, Page 14
Mode shift from long-haul road, outbound, daily	184	Technical Note 3, Trip Generation, Page 14
Total mode shift from long-haul road, daily	368	Technical Note 3, Trip Generation, Page 14
Destination of HGV traffic generated by rail terminal		
Remain on site, to and from warehousing	35%	Technical Note 3, Trip Generation, Page 16
To and from the hinterland	65%	Technical Note 3, Trip Generation, Page 16
Total	100%	
HGV trips from rail terminal into the integrated warehouse site	64	Technical Note 3, Trip Generation, Page 16
HGV trips from the integrated warehouse site to the rail terminal	64	Technical Note 3, Trip Generation, Page 16
Inbound+outbound HGV trips from rail terminal, into or from integrated warehouse site	129	Technical Note 3, Trip Generation, Page 16
HGV trips from rail terminal into the hinderland	120	Technical Note 3, Trip Generation, Page 16
HGV trips from the hinderland into the rail terminal	120	Technical Note 3, Trip Generation, Page 16
Inbound+outbound HGV trips from rail terminal, into hinderland	239	Technical Note 3, Trip Generation, Page 16

4-train scenario

Warehousing-related HGV trips

Daily Heavy Vehicle Trip Generation for B8 (warehousing) uses; no interaction with rail terminal		
Arrive	2,293	Technical Note 3, Trip Generation, Page 12
Depart	2,296	Technical Note 3, Trip Generation, Page 12
Either-way ("2-way")	4,589	

Total HGV trips for the whole development (freight terminal + warehousing)

Daily HGV arrivals	2,459	Technical Note 3, Trip Generation, Page 18
Daily HGV departures	2,461	Technical Note 3, Trip Generation, Page 18
Total daily HGV either-way ("2-way") trips	4,920	

Trips inferred/summarised for 4-train scenario

		Percent	
HGVs entering the site from the road network	2,348	100%	Lower that 2,459 in 12-train scenario, reflecting lower overall site activity
Number of which go directly to the rail terminal	120	5%	
Number of which go directly to the warehouses	2,229	95%	
Traffic to warehouses from rail terminal	64	3%	
Total trips arriving at warehouses	2,293	98%	
HGVs exiting warehouses	2,296	98%	
HGVs going directly from warehouses to rail terminal	64	3%	
Number of HGVs originating from warehouses exiting the site	2,232	95%	
Number of HGVs originating from rail terminal exiting the site	120	5%	

4-train scenario

Total HGVs exiting the site to the road network	2,351	100%	Lower than 2,461 in 12-train scenario, reflecting lower overall site activity
Aggregate figures			
External road network HGVs	4,699	100%	
HGVs External road network to/from rail terminal	239	5%	
HGVs from/to warehouses entering/exiting the site	4,460	95%	
Rail terminal to/from warehouses	129	3%	
HGVs entering or leaving warehouses (from any source)	4,589	98%	

For every 1 HGV-load arriving by train, there will be...	35	...HGV loads arriving on the road network
Warehouse freight input by rail		3%

Required size of warehouse estate

	Warehouse freight input by rail	Warehouse area	Warehouse area, rounded	"Oversize ratio"	Total HGV warehouse arrivals
Applicant's proposal	3%	603,850	604,000		2,293
Scenario	100%	16,959	17,000	36	64
Scenario	50%	33,919	34,000	18	129
Scenario	20%	84,797	85,000	7	322

T, were used in researching the topics discussed in this note and for drafting an initial version of this document.

The existing SRFI network offers preferable alternatives to the proposed development

To the Examining Authority,

On the topic of "location and alternatives considered", the Examining Authority must investigate whether Ardley is the right location for a 604,000 square metre logistics estate with extensive highway works and significant local impacts.

The applicant's case rests heavily on the site's location beside Junction 10 of the M40 and the Chiltern Main Line. The applicant argues that there are currently no SRFIs on the M40 corridor or within Oxfordshire, and that this proposal would fill that gap.

But the wider picture is different: The applicant's own evidence shows that the surrounding region is already served by a substantial network of existing and consented Strategic Rail Freight Interchanges, including DIRFT, Hams Hall, West Midlands Interchange, Radlett and Northampton Gateway.

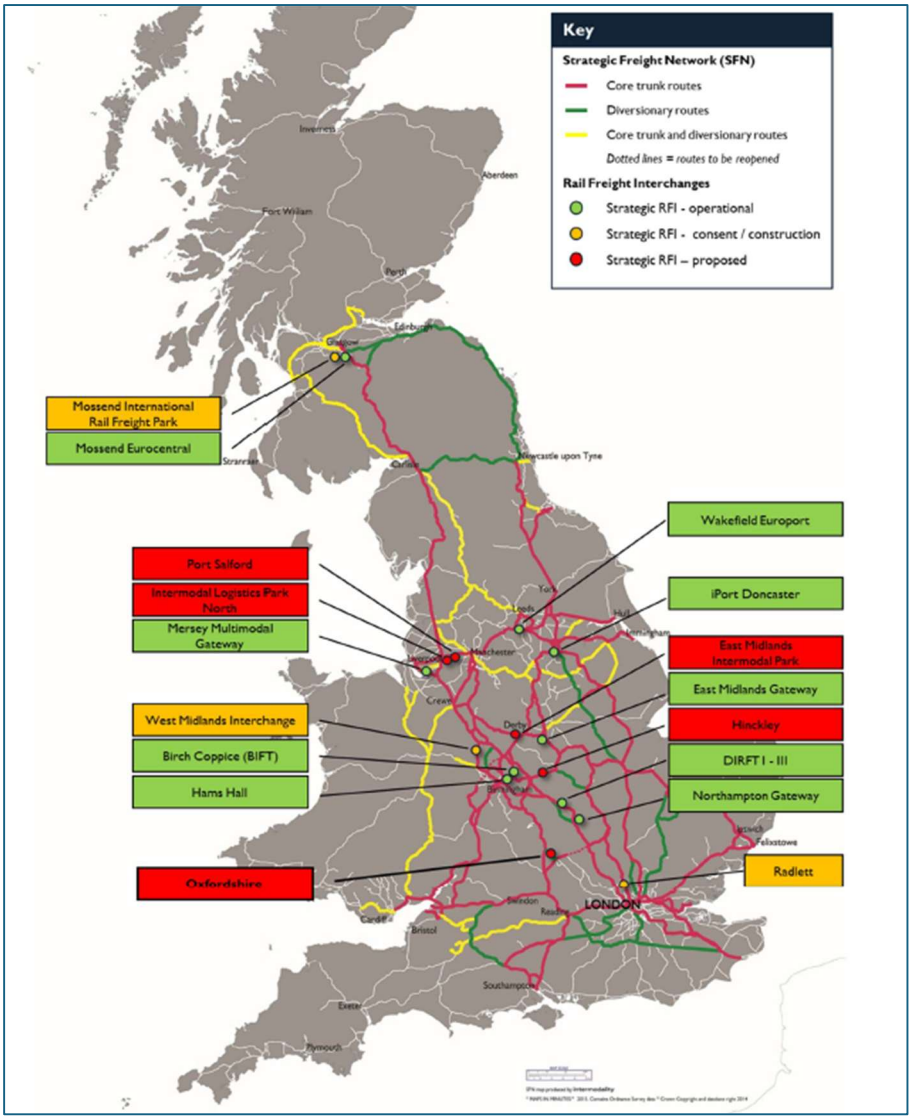


Figure 1: Note that Radlett SRFI is much closer to London, several SRFIs are closer to Birmingham/Midlands, and Ardley's proximity to the new Northampton SRFI. (Illustration from Rail Report, Document number 7.2A, page 17.)

That matters, because the applicant's Market Analysis does not confine itself to serving Oxfordshire. It claims a catchment extending across the western Home Counties, the Upper Thames Valley, the south-west Midlands and parts of London[1]; areas that overlap greatly with markets already served, or which will be served, by those nearby facilities.

Yet, as Oxfordshire County Council has previously pointed out[2], the applicant has not demonstrated whether those existing and consented interchanges could provide additional capacity, nor has it properly considered the overlap between this proposal and Northampton Gateway. Notably, the new Northampton Gateway is just 25 miles from the proposed Ardley site[3], with a direct dual carriageway connection (the A43).

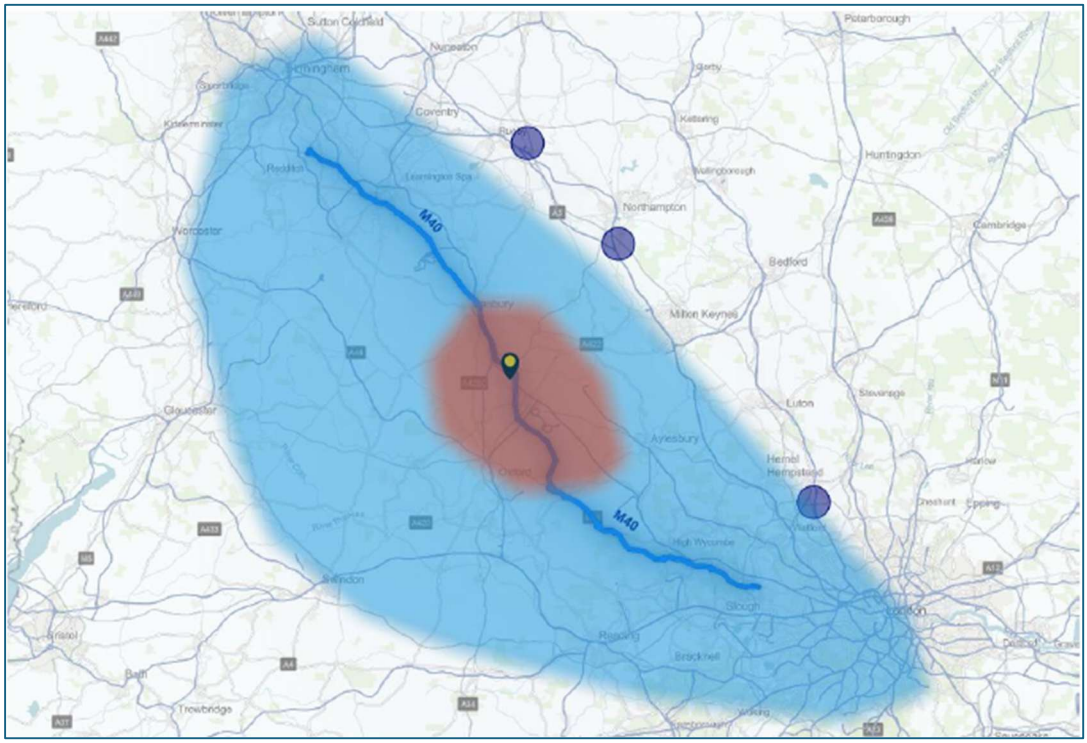


Figure 2: Area envisioned by the Applicant to be served by the Ardley SRFI. Note extensive overlap with areas served by Birmingham SRFIs (Hams Hall, Birch Coppice and West Midlands Interchange), the London area served by the SRFI in Radlett, and areas near Reading that would be far better served by constructing an SRFI on the Great Western Main Line near Reading or Swindon. (Market Analysis Report, Document number 7.1, section 6.16)

Because nearby SRFIs already serve key parts of the claimed market, the burden falls on the applicant to explain why this particular site—and its substantial local impacts—is necessary *in addition to* that existing regional network of SRFIs. In fact, the applicant has *not* demonstrated why this particular location is preferable to realistic alternatives, despite its proximity to an established and expanding SRFI network and despite the exceptional local infrastructure improvements required to make it function.

On that basis, I invite the Examining Authority to conclude that the applicant has not demonstrated that this location satisfies the National Policy Statement's requirement for the right infrastructure, in the right place, supported by a sufficiently robust assessment of realistic alternatives.

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[1] OxSRFI-Boards_V16_Web.pdf

[2] Oxfordshire Strategic Rail Freight Interchange Response to non-statutory consultation June 2022

[3] The calculated driving distance from M1 J15 at Northampton SRFI to M40J10 at the proposed OxSRFI SRFI is 24.5 miles when using the direct A43 dual carriageway link.

The Chiltern Line is not suitable for large-scale rail freight[i]

To the Examining Authority,

For rail freight to be economically and operationally viable, a Strategic Rail Freight Interchange should be built on a railway that is ready for modern intermodal and CO2-neutral freight, not one that begins with fundamental operational handicaps.

The Chiltern Line is a busy commuter line, not a part of the UK Strategic Rail Freight Network for Intermodal Freight

The applicant's case depends on the proposition that the Chiltern Line, which is not part of the UK's main Strategic Rail Freight Network (SRFN) for intermodal freight[1], is an appropriate railway on which to build a new Strategic Rail Freight Interchange.

The National Networks National Policy Statement[2] acknowledges a fundamental constraint on rail freight growth: Britain's railway is already intensely used, and two-track lines carrying both passenger and freight services face particular capacity problems because slow freight trains compete for space with faster passenger trains.

The applicant itself quotes the National Policy Statement's warning that mixed-traffic two-track railways leave few opportunities for fast trains to overtake slower freight trains[3]. Because freight trains accelerate slowly and have low maximum speeds, their inclusion in the timetable also tends to cause significant gaps between paths available for passenger services and reduce overall passenger capacity. That is particularly true, as would be the case here, when those freight trains are hauled by diesel locomotives which are less powerful and accelerate much slower than locomotives powered by electricity[4].

In recent years Chiltern Railways introduced additional passenger services, including a 15-minute commuter timetable in parts of the route and further capacity increases across Buckinghamshire. The operator acknowledged continuing capacity pressures and stated that virtually all available rolling stock was being used to meet passenger demand[5].

In response to high passenger demand, a further 25 daily services will be introduced from December 2026[6]. Looking ahead, passenger services on the Chiltern Line can be expected to increase further as East West Rail develops and as Chiltern Line commuter services continue to expand. The proposed Puy du Fou park, if realised, could also greatly increase passenger rail demand on the Chiltern Line.

Proposed W8 gauge falls short of W10 precedent for SRFIs

The Chiltern Main Line is currently a W7 gauge route, with enhancement proposed only to W8. Meanwhile, Britain's principal freight corridors - and the rail links serving every comparable Strategic Rail Freight Interchange - have been upgraded to W10 gauge or higher.

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[1] https://sacuksprodnrdigital0001.blob.core.windows.net/freight/Freight/Strategic%20freight%20sites/Network%20Rail%20freight%20map%20-%20intermodal%20sector.pdf
[2] National Networks National Policy Statement, March 2024
[3] National Networks National Policy Statement, March 2024, paragraph 3.51
[4] https://www.railengineer.co.uk/electric-freight-a-solution-to-the-wcml-capacity-conundrum/
[5] https://www.chilternrailways.co.uk/capacity-challenges-2025
[6] https://www.gov.uk/government/news/chiltern-railways-brought-into-public-ownership

Network Rail[7] has stressed the operational importance of W10 gauge for rail freight operations, stating that *"it is essential to enhance the UK loading gauge to a minimum of W10 gauge"* and that *"Currently the UK rail network is not designed to carry these larger containers [high-cube] whereas 8'-6" containers can be moved freely. For rail to maintain its competitive edge it is essential that the operation is kept as efficient as possible given the tight cost/box haulage margins that exist between road and rail"*.

While W8 is technically permissible under the NPS, OxSRFI would be an exception from precedent and operational norms. Instead of connecting directly into a W10 corridor, it would become the only comparable Strategic Rail Freight Interchange relying on a route enhanced only to W8, leaving freight operators with fewer equipment choices, less operational flexibility, and higher costs than on the rail corridors serving competing SRFIs.

Overview of rail gauge capabilities at existing SRFIs in the Central and East Midlands, Thames Valley, and West London[8]:

SRFI Terminal name	Area	Capable of W10	Comments
Birch Coppice (BIFT)	Birmingham	Yes	Expanded to W10 in 2009
DIRFT (I/II/III)	Daventry	Yes	
East Midlands Gateway	East Midlands	Yes	
Hams Hall	Birmingham	Yes	
Northampton Gateway	Northampton	Yes	
Radlett	North London / M25	Yes	W10 required for planning consent
West Midlands Interchange	Birmingham	Yes	

DIRFT, Birch Coppice, Northampton Gateway, West Midlands Interchange, Hams Hall, Radlett and East Midlands Gateway all connect directly into W10+ freight corridors designed to accommodate today's dominant high-cube container traffic on standard container carriages.

The most telling comparison is Radlett. There, the consent required gauge enhancement to W10 before the development could be substantially occupied[9]. If Government considered W10 enhancement essential for Radlett, why should Oxfordshire accept an SRFI whose long-term operation would depend on the restrictive W8 loading gauge?

W8 is a barrier to future rail freight electrification, hindering future net-zero operations

The narrow loading gauge of the Chiltern Line is also a significant barrier to future electrification. Chiltern Railways carefully analysed the potential for electrification[10] and concluded that "*it is extremely costly to electrify certain pieces of infrastructure […]*" For that reason, Chiltern Railways envisioned "*battery-electric trains, alongside the partial electrification of the Chiltern network.*"

[7] https://www.networkrailmediacentre.co.uk/news/multi-million-pound-rail-project-takes-a-weight-off-our-roads
[8] https://www.networkrail.co.uk/wp-content/uploads/2022/02/Network-Rail-freight-map-intermodal-sector.pdf
[9] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/330255/14-07-14_DL_IR_SRFI_Radlett_REDET_2109433.pdf
[10] Chiltern Railways, 2023 Vision, v2. October 2025

While partial electrification could potentially, in combination with batteries, meet the energy needs of light passenger trains, it would be entirely unsuitable for the much greater energy requirements of locomotives pulling fully laden freight trains. In other words, the narrow loading gauge is likely to hinder future CO2-neutral freight operations on the Chiltern Main Line, as required to support the Government's policy of delivering a net zero rail network by 2050[11]

Conclusions

The National Networks National Policy Statement requires decisions to be based on infrastructure that is suitable for its intended purpose, while balancing benefits against real operational constraints. The applicant has chosen a non-electrified railway that operates as a mixed-traffic two-track line which faces increasing capacity pressures from growing commuter services to London and to Birmingham, and to towns in between. It would be entirely inappropriate to build one of Britain's largest rail logistics developments a non-electrified railway line with an operationally restrictive W8 loading gauge that will remain below the standard adopted across every comparable Strategic Rail Freight Interchange.

On that basis, I invite the Examining Authority to conclude that the applicant has not demonstrated that the proposed location on the Chiltern Line provides a sufficiently suitable, resilient or future-proof foundation to support decades of intense freight operations.

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[i] *Artificial Intelligence Disclosure: AI tools, mainly ChatGPT, were used in researching the topics discussed in this note and for drafting an initial version of this document.*

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[11] Department for Transport, Decarbonising Transport, A better, greener Britain, 2021

OxSRFI would preclude the re-opening of a viable Ardley Station[i]

To the Examining Authority,

The National Networks National Policy Statement requires infrastructure to optimise outcomes at local, regional, and national levels—not simply to solve one transport problem while creating another. That principle is particularly relevant at Ardley.

Oxfordshire County Council has concluded that reopening Ardley station could significantly improve rail access for surrounding communities and reduce reliance on road travel[1]. But a viable station is not just two platforms and a ticket machine. A successful station would need to attract enough passengers to justify frequent train services.

A viable Ardley passenger station will require supporting infrastructure and access

A local case study is instructive: Haddenham & Thame Parkway, 20 miles South of Ardley, offers eleven direct train services to London each morning[2], and serves 900,000 passengers a year. It achieves those frequent train services by having strong bus access and over 430 parking spaces just off the A418. In contrast, King's Sutton, eight miles North of Ardley, is a village-centre station with only 23 parking spaces, 82,000 passengers a year, and just one direct morning train to London.

The lesson is clear: Viable stations need passengers, and passengers need access. To be viable, Ardley Station would need to be able to draw passengers from a wide area, not only from within walking or cycling distance.

The problem is that the proposed SRFI would occupy precisely the land needed for that access. The fields South of the rail line provide the obvious location for a bus interchange, park-and-ride facilities and future expansion, yet those areas would be consumed by the warehouse development. The proposal leaves no credible space for the wider transport hub that the new station would ultimately require.

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[1] https://news.oxfordshire.gov.uk/study-shows-potential-benefits-of-new-railway-station-at-ardley/

[2] "Morning" defined as departing the station between 06:00 and 10:00.



Figure 1: The Applicant's map of the proposed development shows how its presence would hinder future vehicle access to the Ardley Station site (just North of the Intermodal Rail Terminal), and preclude the future construction of Park-and-Ride facilities South of the Chiltern Main Line.

Perversely, the Applicant has proposed a "rail" development where 88% of employees would arrive in passenger cars[3], while permanently constraining the future passenger station that could reduce car dependence across north Oxfordshire.

The Applicant's conclusions regarding Ardley station rests on the wrong assumptions

The applicant has supplied an analysis of the SRFI's impact on a re-opening of Ardley station[4], which concludes (paragraph 5.6) that *"the OxSRFI proposals do not prejudice proposals being advanced by any other parties for the delivery of a new passenger station at Ardley. […]"*

This conclusion however rests on a fundamental flaw, being (paragraph 3.18) that *"For the purposes of this Note, it is assumed that the station facility would have similar characteristics to the configuration indicated at Figure 7, which should be capable of being accommodated within the broad footprint of the former Ardley Station and goods sidings"*.

[3] DCO Submission, Environmental Statement, Chapter 3: Transport, Document 6.3**,** Paragraph 3.5.44. The 88% referenced is the year-9 sum of 68% SOV (Single-Occupant Vehicles) and 20% Car Share. Public Transport (bus) would account for just 8%, with the remaining 4% being Walking and Cycling.

[4] DCO Submission, Planning Statement, Appendix 3: Passenger Rail Station Note, Document 5.4C, Rev A

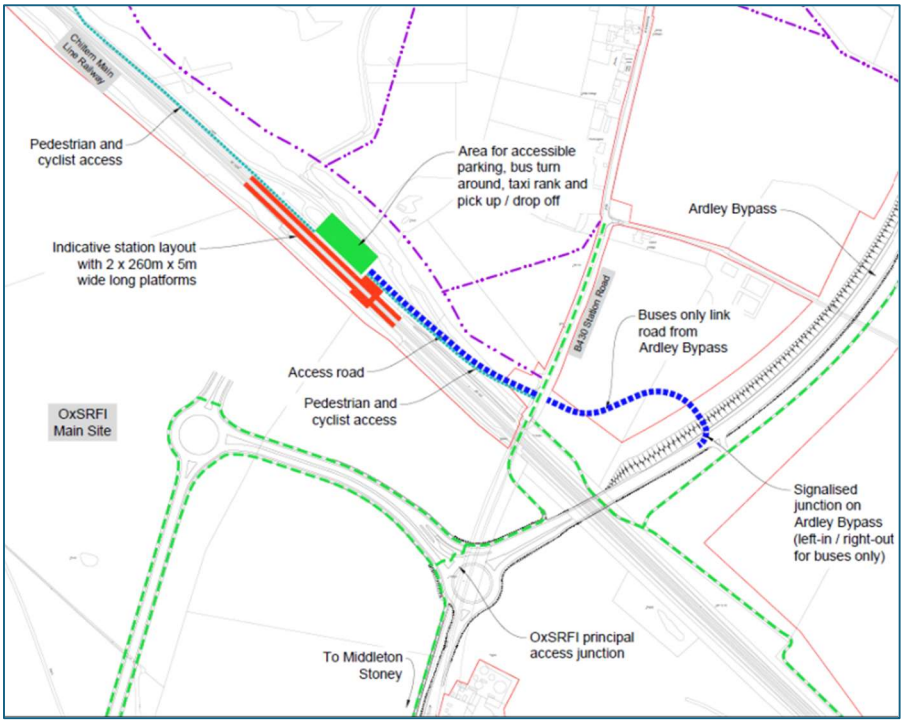


Figure 2: Central section of Applicant's "Figure 7", showing the assumed layout of the new Ardley station being confined to the land area of the failed 1963 station.

In short, the Applicant's key assumption is that the future Ardley passenger station would be accommodated wholly within the site of the long-defunct "old Ardley" station, which closed in 1963 due to insufficient passenger demand.

More specifically those assumptions would mean, according to the Applicants drawing:

- No parking at the station, except a limited number of accessible (disabled) parking spaces.
- "Bus turn around" on station forecourt.
- "Drop off" car access to the station (through Ardley village only).

It is inconceivable that a future Ardley station could be operationally viable with this level of access and infrastructure. Most notable is the absence of any Park-and-Ride facilities. Due to its location, it is not plausible that Ardley station could be viable without a generously sized Park-and-Ride. For comparison, other popular commuter stations in Oxfordshire have Park-and-Ride capacity ranging from 240 to over 800 spaces:

- Hanborough: 240 spaces
- Bicester North: 365 spaces
- Haddenham and Thame Parkway: 430 spaces
- Oxford Parkway: 800 spaces

The provision of "bus turn-around" also appears insufficient to serve bus passengers to and from Ardley, considering the potential future need for shuttle buses serving a significant share of the 1.5 million guests[5] travelling to and from the Puy du Fou site each year. The nearby example of Bicester Village station also illustrates the high passenger potential of such "destination" rail stations serving major tourist attractions.

[5] Source: Socioeconomics Clarification Note – Environmental Statement Addendum (May 2026). Puy du Fou.

Conclusions

This examination must decide whether this development should foreclose one of Oxfordshire's most promising future public transport opportunities. Once this land is built on, the opportunity to create an Ardley passenger station with the necessary supporting infrastructure would be permanently lost. That would also adversely impact transportation options for the proposed Puy du Fou leisure park, and for the proposed Baynard's Green logistics estate just North of M40 J10. That cumulative adverse impact must also be considered.

I therefore invite the Examining Authority to conclude that the applicant has failed to demonstrate that the proposed development adequately safeguards the future delivery of a genuinely viable Ardley passenger station, thereby causing a sub-optimal infrastructure outcome for the area.

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[i] *Artificial Intelligence Disclosure: AI tools, mainly ChatGPT, were used in researching the topics discussed in this note and for drafting an initial version of this document.*

FAO: Cherwell District Council

Re: Application (25/02190/HYBRID) for 9,000 homes at Heyford Park Camp Road Upper Heyford

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The Council's legal duties when determining planning applications on sites where PFAS contamination is known or suspected

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Introduction

1. In August 2025 an application was submitted to Cherwell District Council ("**the Council**") for a 9,000-home development on a former RAF base now known as Heyford Park ("**the Site**"). The application is the latest application for planning permission from the Dorchester Group ("**the Developer**") who have been redeveloping the Site into a residential-led community since 2009. Over 1,500 homes have already been built, alongside Heyford Park School, a hotel, retail facilities, and a growing commercial cluster.

2. Over the past few years, the Environment Agency ("**the EA**") has been testing water in local stream called Gallos Brook at a site called Leys Farm Ditch, which is 4.5km downstream of the Site. Those results show high levels of specific PFAS compounds (including PFOS, PFOA, PFHxS, and fluorotelomer sulfonates) which are commonly associated with Aqueous Film Forming Foam ("**AFFF**"), which is a type of firefighting foam. The total PFAS concentrations at surface water samples collected by the EA at this location reached up to 2.295 µg/L (2295 ng/L), which is significantly higher than the Drinking Water Inspectorate's drinking-water guidance threshold of 0.1 µg/L (100 ng/L).[1]

[1] https://dwi-production-files.s3.eu-west-2.amazonaws.com/wp-content/uploads/2025/03/24141825/DWI_PFAS-Guidance_Mar_2025.pdf, at page 5.

3. Alarmed by these results and the potential for wider scale contamination, a local community group engaged Subadra Consulting Limited to review the EA's testing results. Subadra's report, which can be found at Appendix 1 of this opinion, notes that the chemical signature of the PFAS identified at Leys Farm Ditch suggests an AFFF source and that they therefore consider the former RAF base to be a "*tangible source of the PFAS compounds*", although they note that, at that time, they had not carried out any additional samples to support this.

4. The local community group then instructed Subadra to conduct a further test of a stream which is only 0.5km downstream of the Site ("**the Further Test**"). The results of the Further Test are enclosed at Appendix 2 and show significantly higher levels of PFAS than that found at the EA's testing site: for example, PFOS concentrations were recorded at 27,823ng/l, which is 40 times higher than the concentrations recorded by the EA at Leys Farm Ditch, 4km further downstream. To put this into perspective, the Environmental Quality Standard (EQS) for PFOS in inland surface waters is 0.65ng/l.

5. Subadra notes the following in respect of the Further Test results:

"*The suite of compounds detected is highly characteristic of aqueous film-forming foam (AFFF) contamination, typically associated with fire-training areas, airports, military installations and similar facilities, rather than ordinary urban wastewater or diffuse background contamination. In our opinion, the concentrations recorded are sufficiently elevated to indicate the presence of a significant historic source of PFAS contamination. Concentrations of PFOS recorded at UHS1 (27,823ng/l) are forty times higher than those recorded in samples collected from Leys Farm Ditch, located approximately 4km downstream of Sampling Location 1, carried out by the Environment Agency. The lower downstream concentrations are likely attributable to dilution effects as additional tributaries join the watercourse. Conversely, the substantially higher upstream concentrations strongly suggest the presence of a significant PFAS source relatively close to Sampling Location 1.*

The EU/UK annual average Environmental Quality Standard (EQS) for PFOS in inland surface waters is 0.65ng/L. The concentrations recorded at the sampling location are therefore approximately 43,000 times greater than the annual average EQS for PFOS.

For context, comparable PFAS investigations have been undertaken in a stream located downstream of the Fire Service College in Moreton-in-Marsh. From the 1960s through to the early 2000s, the college conducted firefighting training exercises involving the ignition of large hydrocarbon fires, which were extinguished using fire fighting foams. Similar to RAF Upper Heyford, the site also has a military/RAF history dating back to the Second World War. The maximum PFOS concentration reported during that investigation was 1,320 ng/L which, whilst approximately 2,000 times the relevant EQS, is nevertheless an order of magnitude lower than the concentrations we recorded in Sampling Location 1."

6. It is therefore apparent from the testing that has already been carried out that there is a very serious risk of contamination in and around the Site.

7. Given the significant environmental and public health risks associated with this development proposal, I have been instructed by a founding member of local community group Gallos Brook to set out the Council's legal duties when determining an application for planning permission relating to a site where PFAS contamination is known or suspected.

8. This legal opinion will therefore cover the following:

   (i) The current state of knowledge and PFAS and recent developments in the UK and internationally which demonstrate the extent of the environmental and public health risks associated PFAS.

   (ii) How the Developer has dealt with PFAS in this application for planning permission.

   (iii) How the planning regime is intended to deal with known or suspected contamination.

   (iv) The Council's wider duties to investigate potentially contaminated land.

   (v) The Council's duties under the *Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (SI 2017/571)* ("**the EIA Regulations**").

(vi) The Council's obligations under the *Conservation of Habitats and Species Regulations 2017 (SI 2017/1012)* ("**the Habitats Regulations**").

(vii) The Council's obligations under the *Water Environment (Water Framework Directive) (England and Wales) Regulations 2017* ("**the WFD Regulations**")

Current state of knowledge on PFAS and recent developments

9. PFAS, a family of approximately 10,000 chemicals, are present in, inter-alia, non-stick cookware and stain-resistant surfaces; dental floss; menstrual products; food packaging; takeaway containers; plastic lunch boxes; waterproof and synthetic clothing; cosmetics and crucially, for present purposes, firefighting foam. They are known for being highly mobile – with an ability to contaminate water pathways and soil many miles from the contamination source - and notoriously difficult to break down, hence the colloquial term, "*forever chemicals*".

10. There is a significant body of scientific studies on the ubiquitous presence of PFAS in water, soil, air and food and their detrimental impacts on human health, wildlife and the environment. PFAS attach to proteins in the bloodstreams of humans and animals and accumulate within them as they age. Peer-reviewed medical research[2] demonstrates the significant risk to public health posed by these chemicals, linking PFAS to multiple cancers, ulcerative colitis, immunotoxicity, endocrine disorders, pregnancy-induced hypertension, decreased fertility and infertility, high cholesterol and thyroid disease. Furthermore, the harmful effects of PFAS on human health have already been widely and successfully litigated, most notably in the USA.[3]

11. Although most people are regularly exposed to PFAS, those most at risk are people working in occupations such as firefighting or chemicals manufacturing and processing, or who live near contaminated soil and water sources, such as former RAF bases. In 2025, concerns that military sites, including RAF bases, were responsible for leaking

[2] https://www.epa.gov/pfas/our-current-understanding-human-health-and-environmental-risks-pfas
[3] Chemicals manufacturing company DuPont (and latterly, DuPont, Corteva and Chemours) have been the subject of a long-running class action for contaminating a town with PFAS used for the production of Teflon non-stick cookware.

PFAS pollution into drinking water sources and protected environmental sites led the Ministry of Defence ("**MoD**") to announce an investigation into RAF Marham in Norfolk RM Chivenor in Devon and AAC Middle Wallop in Hampshire.[4] Moreover, the former RAF base, Duxford Airfield, has been linked to PFOS-polluted drinking water supplies in South Cambridgeshire.[5]

12. The demonstrable and often wide-ranging impacts of PFAS on environmental and human health can be illustrated by the following example case studies.

    (i) High levels of PFAS pollution linked to the use of firefighting foams at Jersey Airport were discovered in groundwater in Jersey in the 1990s. The chemicals leaked into the neighbouring area and private borehole water supplies, polluting private and public water supplies. Groundwater and surface water below the airport fire training ground still contain elevated levels of PFAS and recent blood tests revealed that the concentration of PFAS in some residents' blood is of a level that can lead to health problems. Consequently, a report[6] by the island's independent PFAS scientific advisory panel recommended bloodletting, amongst other measures, to reduce the high concentrations of PFAS found in residents' blood. Furthermore, in 2024, a study by the Government of Jersey revealed that Jersey potatoes grown in fields irrigated by PFAS-polluted water contained high levels of PFOS[7] at 10 times the European Commission's recommended levels.[8]

    (ii) Following the detection of PFAS in local drinking water at four times the recommended limit[9], approximately 60,000 residents in 11 communes near Basel-Mulhouse airport in the Grand Est region of France were banned from

[4] https://www.theguardian.com/environment/2025/apr/19/uk-military-bases-chemical-leaks-forever-chemicals-drinking-water
[5] https://www.dwi.gov.uk/water-companies/improvement-programmes/south-staffordshire-water-improvement-programmes/cam-2022-00001-v5/
[6] https://www.gov.je/SiteCollectionDocuments/Health%20and%20wellbeing/Draft%20Third%20Report%20of%20the%20Independent%20PFAS%20Scientific%20Advisory%20Panel%20for%20Jersey.pdf
[7] https://www.gov.je/SiteCollectionDocuments/Environment%20and%20greener%20living/Assessment%20of%20potatoes%20grown%20within%20St%20Ouen%E2%80%99s%20Bay%20to%20explore%20the%20presence%20of%20PFAS.pdf
[8] https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32022H1431
[9] The EU has since imposed legally binding limits for PFAS in drinking water across Europe which came into force in January 2026.

drinking tap water for several months.[10] Local authorities have attributed the PFAS contamination to the use of firefighting foams at the airport between the 1960s and 2017. The new terminal covers the ground where the firefighting foam was used. Even though the foam has not been used at the airport for approximately 8 years, the PFAS contamination has remained in the soil and contaminated the groundwater which lies 15 metres below the terminal.

(iii) The scale of PFAS pollution in groundwater near a PFAS manufacturing site in Zwijndrecht, Flanders, resulted in a warning to all those living within a 10-mile radius of the site not to eat any eggs laid in their gardens and avoid homegrown vegetables.[11]

(iv) In the UK, the area surrounding a chemicals plant run by AGC Chemicals Europe in Thornton-Cleveleys is currently subject to a contaminated land investigation.[12] High levels of PFAS contamination in Bentham, Yorkshire, allegedly linked to a local firefighting foam manufacturer, were also the subject of a recent ITV documentary entitled "*In Our Blood: The Forever Chemicals Scandal*".[13]

13. The scale of the problem has led the Government to publish its PFAS Plan in February 2026[14]. The foreword to the plan notes, "*PFAS contamination threatens public health, wildlife and the quality of our natural environment. Acting now is essential to prevent irreversible harm and to ensure that our regulatory frameworks keep pace with scientific evidence. This plan provides a foundation for how we will act – decisively but proportionately – to manage risks. Our vision is to reduce and minimise the harmful effects of PFAS while transitioning to safer alternative substances. It reflects our commitment to protect public health and the environment while supporting innovation and economic growth.*"

[10] https://www.theguardian.com/environment/2025/jul/01/pfas-forever-chemicals-water-contamination-saint-louis-france-aoe
[11] https://www.euronews.com/my-europe/2023/03/13/residents-of-belgian-town-living-through-nightmare-of-forever-chemical-pollution
[12] https://agcce.com/about-us/site-investigation/
[13] https://www.itv.com/presscentre/epweekweek-13-2026-sat-21-mar-fri-27-mar/our-blood-forever-chemicals-scandal
[14] https://www.gov.uk/government/publications/pfas-plan/pfas-plan-building-a-safer-future-together

How the Developer has dealt with PFAS in its application for planning permission

14. It will be apparent from the above that PFAS contamination presents serious and well-documented environmental and public health risks, with RAF bases, airports, and industrial sites where firefighting foam has been used or manufactured giving rise to particularly acute concern. However, the Developer appears to have only given PFAS the most cursory of treatment in its application documents:

(i) Chapter 10 of the Developer's Environmental Statement ("**ES**") on Ground Conditions merely states the following in relation to PFAS: "*Although there was no visual or olfactory indicators, Per and Polyfluoroalkyl Substances (PFAS) contamination associated with fire-fighting activities due to the historical use of the Site, as well as the use of radioactive luminous dials cannot be discounted*".

(ii) On 15 April 2026, the Developer uploaded a "*Draft PFAS Statement*" to the planning portal. The document, which is only 1 page-long notes that:

- "*As with many airfields, the historic use of the site means that there is potential for legacy contamination, including Per-Polyfluoroalkyl (PFAS) which are commonly associated with historic firefighting activities which occurred prior to our ownership. This is not unique to Heyford Park.*"

- "*The prevalence of PFAS in the environment across the UK has been well publicized in the last few years, and the possibility of it being present at Heyford Park has already been identified in the site's environmental assessments and Ground Conditions studies. These reports confirm that further targeted investigation is appropriate in specific areas, alongside the assessment of other potential contaminants such as hydrocarbons*."

- "*The identification of PFAS as a potential risk does not mean that unacceptable harm is occurring*."

- "*The development will proceed in line with national planning and environmental guidance. Where contamination is identified, land will be remediated to ensure that it is safe for its intended use*."

- In addition, the Developer attempts to distance itself from extremely high levels of PFAS detected approximately 5km away from the Site noting that it "*could have come in part or wholly from other sources*".

15. Notwithstanding the findings of the EA, Subadra and the Developer's own acknowledgement that PFAS contamination "*cannot be discounted*" and "*further targeted investigation is appropriate*", I understand that neither a baseline assessment of PFAS contamination nor consideration of the effects of the development proposal on that PFAS contamination (for example in terms of migration or transfer of PFAS to other areas or increased exposure and therefore greater risk to human health) as part of environmental assessment have been undertaken. Nor can I find any engagement with the potential for PFAS contamination to harm the integrity of protected sites in the Site's vicinity.

16. I will consider the legal implications of these omissions later in this opinion.

How the planning regime is intended to deal with known or suspected contamination

17. The main thrust of the planning regime's consideration of contamination is to remove unacceptable risks. Since planning is generally concerned with future use and development, the focus of the planning system is generally to make the site suitable for its proposed future use.

18. In practice, most remediation therefore takes places voluntarily during the development or redevelopment of land under the *Town and Country Planning Act 1990* (ss 55 and 57 of the TCPA 1990). This is usually secured through s106 planning obligations or conditions but the need for sufficient information during the planning process will often require investigative works to be undertaken prior to determination of the application.

19. There is a clear policy expectation that it is developers and/or landowners who bear the risk and responsibility to ensure a safe development by way of prevention, remediation and mitigation (para 197 of the National Planning Policy Framework ("**NPPF**") dated

December 2024). The expectation that developers or landowners will take responsibility for preventing, remediating and mitigating contamination is carried over into the NPPF consultation draft published on 16 December 2025, within the section 'Creating high quality, sustainable places', policy block P2: Ground Conditions.

20. Moreover, the glossary of the new consultation draft clarifies that "*contamination*" means "*where the actual or suspected presence of substances in, on or under the land may cause risks to people, property, human activities or the environment, regardless of whether or not the land meets the statutory definition of Contaminated Land in Part IIA.*" This reflects the long-standing principle that identifying and managing risk is central to how contaminated land is addressed in the planning system.

21. The important role that planning policies and decisions play in rendering a site suitable for its proposed use, taking account of ground conditions and any risks arising from contamination, is underscored at para 196 of the NPPF (December 2024). This is repeated in the new draft NPPF in policy block P2: Ground Conditions. In addition, para 187(f) of the December 2024 NPPF envisages the planning system enhancing the natural environment, including by remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

22. The NPPF highlights the importance of tailoring planning policies and decisions so that they are appropriate for their location, taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from development.

23. Ultimately, the NPPF's objective for planning policies and decisions dealing with contaminated land is that the land is suitable for its proposed use (para. 196(a) of the NPPF December 2024), and that "*as a minimum*", land should not be capable of being determined as 'contaminated land' under Part 2A of the Environmental Protection Act 1990 ("**EPA 1990**") after remediation (para. 196(b) NPPF December 2024). The current 2024 NPPF emphasises the need for adequate site investigation information to inform these judgments (para. 196(c)). The draft NPPF published on 16 December 2025 has therefore not changed the policy expectations regarding contaminated land. The use of

the words "*as a minimum*" indicates the contaminated land standard is a floor, not a ceiling. Higher standards of clean up may therefore be appropriate if this is reasonably judged to be necessary for the proposed use.

24. The Planning Practice Guidance ("**PPG**") for 'Land affected by contamination' clarifies that the role of planning when dealing with potential land contamination is to ensure a site is suitable for its new use and to prevent unacceptable risk from pollution. The PPG then makes clear that contamination may be present even in land that is not formerly industrial, and that its presence can only be identified through investigation.

25. As with the NPPF, the PPG confirms that the implications of contamination for development is a material consideration that should be considered "*through the planning process to the extent that it is not addressed by other regimes*".

26. The NPPF and the PPG both prescribe a high level of cooperation between applicants for planning permission and the LPA. Applicants are expected to undertake "*early engagement with the local planning and environmental health departments, particularly if the land is determined as contaminated land under the contaminated land regime* (…)" (para 005 PPG). Therefore, the PPG clearly expects applicants to engage with both the planning and environmental health departments whenever contamination is a potential issue, particularly but not exclusively when land falls within the contaminated land regime under Part 2A of the *Environmental Protection Act 1990*. Para 009 confirms that LPAs should work with applicants to find acceptable ways forward if there are concerns about land contamination.

27. The PPG provides helpful guidance on the stages and factors to consider in framing appropriate planning conditions and planning obligations (paras 010-011).

28. There can therefore be no doubt that land contamination, or the possibility of it, is a material consideration that must be taken into account by local planning authorities when considering planning applications.

The Council's wider duties to investigate potentially contaminated land

29. Furthermore, and independently of the determination of this planning permission, I consider that the Council's contaminated land duties are engaged in respect of the former RAF base. In my view, the Council's contaminated land duties are also engaged beyond the former RAF base and encompass the surrounding area due to the EA and Subadra's test results which indicate that PFAS pollution has spread beyond the former RAF base.

30. Part 2A of the EPA 1990 seeks to ensure the remediation of contaminated land that causes an unacceptable risk. "*Contaminated land*" is defined in Part 2A as any land which, by reason of substances in, on or under the land, appears to the local authority to be in such a condition that either of the following apply:

    (a) Significant harm[15] *is being caused, or there is a significant possibility of such harm being caused.; or*
    (b) *Significant pollution of controlled waters is being caused, or there is a significant possibility of such harm being caused*.

31. A significant number of homes have already been developed on the site of the former RAF base, as well as a school, hotel and other facilities. The extent of the PFAS contamination revealed by the limited tests that have been carried out so far indicate a potential unacceptable risk of significant harm to the health of people and other living organisms on and in the surrounding area of the former RAF base. There is also a risk of significant harm to ecological systems, controlled waters and property.

32. As such, I consider that the Council is required by law to undertake a contaminated land investigation in respect of the former RAF site and the surrounding area pursuant to s.78B of Part 2A of the EPA 1990 which states that every local authority *"shall cause its area to be inspected from time to time for the purpose – of (a) identifying*

[15] "*Harm*" is defined under s78A(4) of the EPA 1990 as "*harm to the health of living organisms or other interference with the ecological systems of which they form part and, in the case of man, includes harm to his property*."

contaminated land; and (b) of enabling the authority to decide whether any such land is land which is required to be designated as a special site."

33. Therefore, in addition to setting out my views on how PFAS contamination should be assessed in the planning process, I formally invite the Council, on behalf of my client, to discharge its investigative duties under s.78B of Part 2A of the EPA 1990.

The Council's obligations under the Environmental Impact Assessment Regulations 2017

34. Environmental impact assessment of projects likely to have significant effects on the environment is governed by the EIA Regulations.

35. The EIA must identify, describe and assess in an appropriate manner, in light of each individual case, the direct and indirect significant effects of the proposed development on population and human health, biodiversity, land, soil, water, air and climate, material assets, cultural heritage and the landscape, and the interaction between these factors.

36. Any environmental statement ("**ES**") prepared by or on behalf of a developer needs to contain sufficient information for the decision-maker to reach a reasoned conclusion on the likely significant effects of the proposed development on the environment.

37. In short, with respect to PFAS, if there is cogent evidence to demonstrate that PFAS contamination resulting from a proposed development (such as through the exacerbation or exposure of existing sources of contamination) is likely to have significant effects on the environment, for example on hydrology, soils or human health, and no baseline assessment of contamination or of the effects of development on that contamination has been taken into account, that is a legal error and upon judicial review, is likely to lead to the quashing of any decision to grant consent for that proposed development.

38. It is generally for the decision-making body to decide what matters should be covered in an ES (for example, through issuing a scoping opinion), and to request further information from the applicant if it considers the ES is inadequate. However, a decision-making body cannot simply ignore a factor where there is evidence to indicate that factor is likely to have a significant effect and it is not possible to exclude that factor on the basis of objective evidence.

39. As far as I have been able to ascertain from the application documents, there does not appear to be any baseline assessment of PFAS contamination at the Site and the impact of the development on that contamination including any likely significant effects on the environment. The Developer simply says that such effects "*cannot be discounted*" but "*the identification of PFAS as a potential risk does not mean that unacceptable harm is occurring*". Moreover, in its "*Draft PFAS Statement*", the Developer commits to complying with "*national planning and environmental guidance*".

40. In my view, a bare assertion that there is no proof of unacceptable harm without any proper baseline assessment of PFAS contamination and its likely significant effect on the environment is meaningless. It is highly material that the Developer's bare assertion was made before the Further Test was carried out and whose results do indicate potentially serious risks to public and environmental health from PFAS contamination. As such, the Council cannot be satisfied that likely significant effects on the environment have been fully assessed. Ignorance of potential likely significant effects cannot justify the failure to take them into account when they are raised as part of the decision-making process. Furthermore, there is no analysis of whether the pre-existing PFAS contamination is likely to have a significant effect on the environment because of the development.

41. Nor do I agree with the Developer's suggestion that "*further targeted investigations*" could lawfully take place after the grant of planning permission. The starting point for the relevant environmental assessment regimes is that planning authorities can only impose conditions and mitigation measures *after* having assessed the risk of environmental harm. It is simply not permissible under the EIA Regulations to grant permission on the assumption that further assessments on likely significant effects can be undertaken at a later stage.

42. With regard to the relevance of conditions and mitigation for the scope of EIA, in British Telecommunications plc v Gloucester City Council [2001] EWHC Admin 1001; [2002] 2 P& CR 33 the High Court held that it was not open to a planning authority to conclude that there would not be significant environmental effects merely because the authority had required or would require the developer to take mitigating steps which would render such effects insignificant.

43. That is not to say that decision-makers are obliged to ignore any proposed conditions or mitigation at the consent stage. However, the Court in British Telecommunications recognised that descriptions of such measures (i.e. conditions and mitigation) could be considered at the consent stage to enable public discussion to take place about whether the measures will be successful, or perhaps whether more effective measures can be taken than those proposed to ameliorate the anticipated harm.

44. In summary, the EIA Regulations require the effects which the project may have on the environment to be identified and assessed as part of the decision-making process. Given the paucity of the information provided by the Developer on the likely significant effects on the environment from PFAS contamination at the Site and any impacts that the development would have thereon, I consider that the Council could not lawfully grant planning permission for the development in accordance with the EIA Regulations.

The Council's obligations under the Conservation of Habitats and Species Regulations 2017

45. Appropriate Assessment ("**AA**") is the evaluation a competent authority must carry out to determine whether a plan or project will adversely affect the integrity of a protected site either alone or in combination with other plans or projects. The AA of projects likely to have an adverse impact on the integrity of a protected site is governed by the Habitats Regulations which establish a comprehensive framework for the conservation of natural habitats and species, including mechanisms for site designation, assessment of plans and projects, species protection, and enforcement.

46. In determining whether or not to grant planning permission for a project which is likely to have a significant effect on a protected site (either alone or in combination with other plans or projects) and is not directly connected with or necessary to the management of that site, Regulation 63 of the Habitats Regulations requires a competent authority (the Council in this case) to make an AA of the implications of the development proposal for that site in view of that site's conservation objectives. Crucially, Regulation 63(2) requires the person applying for planning permission to provide the competent authority with such information as the competent authority may reasonably require for the purposes of the AA or to enable it to determine whether an AA is required. Moreover, for the purposes of the AA, the competent authority must consult the appropriate nature conservation body and, if appropriate, take the opinion of the general public.

47. Pursuant to Regulation 63(5) and Regulation 64, the competent authority may only grant consent for the plan or project after having ascertained that it will not adversely affect the integrity of the protected site concerned, unless there are imperative reasons of overriding public interest which justify granting consent notwithstanding that adverse effect and no alternative solutions. The Supreme Court in CG Fry & Son Ltd v Secretary of State for Housing, Communities and Local Government [2025] UKSC 35; [2026] 1 All E.R. 615 reiterated the protective purpose of the Regulations, their embodiment of the precautionary principle and the corresponding requirement for a high standard of investigation.

48. The CJEU has consistently held that AA is a two-stage process. First, it is necessary to identify all the aspects of the plan or project which could affect the conservation objectives of the site in the light of the best scientific knowledge in the field. The AA must have no gaps and contain "*complete, precise and definitive findings and conclusions capable of removing all reasonable scientific doubt as to the effects of the proposed works on the protected site concerned*" (*Case C-441/17 Commission v Poland*, ECLI:EU:C:2018:255, paras.113-114; *Joined Cases C-293/17 and C-294/17 Cooperatie Mobilistation for the Environment UA*, ECLI:EU:C:2018:882 at para.98).

49. Second, having identified all possible effects, the competent authority must determine whether the integrity of the site will be adversely affected. Maintaining the integrity of the site requires it to be preserved at a favourable conservation status, which entails the "*lasting preservation*" of the characteristics of the site which are connected to the presence of a natural habitat type for which the protected site has been designated. The integrity of the site will in particular be threatened where there is a risk that an intervention will bring about the disappearance or the partial and irreparable destruction of such a natural habitat present at the site (*Commission v Poland*, paras.115-119).

50. It is permissible to take into account mitigating measures in the AA, so long as these are directed at lessening the direct harmful effects of the plan or project rather than compensating for the harm by providing other benefits (C-164/17 *Sweetman v An Bord Pleanála*, ECLI:EU:C:2018:593, para.47). However, any such measures can only be relied on where the competent authority is "*sufficiently certain that a measure will make an effective contribution to avoiding harm to the integrity of the site concerned, by*

guaranteeing beyond all reasonable doubt that the plan or project at issue will not adversely affect the integrity of the site" (*Cooperatie*, para.128).

51. Following assessment, the plan or project in question may only be approved if the authority is convinced that it will not adversely affect the integrity of the site concerned. Where doubt remains, authorisation will have to be refused: Case C-127/02 *Landelijke Vereniging tot Behoud van de Waddenzee and Nederlandse Vereniging tot Bescherming van Vogels*, ECLI:EU:C:2004:482, paras.56-57).

52. By analogy with its position on the EIA Directive, the CJEU has held that AA should in principle be carried out as soon as the effects which the project in question is likely to have on a protected site are sufficiently identifiable, and in any event before development consent is granted, Case C-411/17 *Inter-Environnement Wallonie ASBL*, ECLI:EU:C:2019:622, at paras.140-143, Case C-254/19 *Friends of the Irish Environment Ltd*, ECLI:EU:C:2020:680, at paras.42-43). This is consistent with the precautionary approach which means a risk of harm to a protected site exists if it cannot be excluded based on objective information and therefore, a project can only be authorised if it would not adversely affect the integrity of the site (Case C-323/17 *People Over Wind and another v Coillte Teoranta*, ECLI:EU:C:2018:244 at para.34).

53. In order to avoid any reasonable scientific doubt and/or any gaps in the AA, the decision-maker must also be satisfied that the effects of any proposed conditions or mitigation are certain at the time of the AA, sufficiently secure and likely to work in practice (see the decision of the Court of Appeal in *No Adastral New Town Limited v Suffolk Coastal District Council, Secretary of State for Communities and Local Government* [2015] EWCA Civ 88; [2015] Env LR 28 at para.72).

54. The standard of reasons required for a conclusion that a plan or project will not adversely affect the integrity of the protected site was recently considered by the CJEU in Case C-721/21 *Eco-Advocacy CLG v An Bord Pleanála*, ECLI:EU:C:2023:477. In that case the CJEU held, by reference to para.51 of its decision in Case C-461/17 *Holohan*, ECLI:EU:C:2018:883, that:

The competent authority should be in a position, following an appropriate assessment, to state to the requisite legal standard the reasons why it was able, prior to the granting of the authorisation at issue, to achieve certainty, notwithstanding any opinions to the contrary expressed, that there was no reasonable scientific doubt with respect to the

environmental impact of the work envisaged on the site concerned (*Eco-Advocacy* at para.40).

55. Applying the above principles on the Habitats Regulations to the Developer's application, there are several protected sites in the vicinity of the Site. Chapter 8 on Ecology of the Developer's ES lists the Ardley Cutting and Quarry SSSI (0.2km east from the Site) and Ardley Trackways SSSI (1.3km east from the Site). In addition to those sites listed by the Developer, Weston Fen SSSI (through which runs Gallos Brook where extremely high levels of PFAS were found) lies several kilometres directly south of the Site. Therefore, the provisions of the Habitats Regulations are directly relevant to the development proposal and the Council in its role as competent authority will need to conduct an AA.

56. The obligation for an AA to have no lacunae and contain complete, precise and definitive findings and conclusions capable of removing all reasonable scientific doubt as to the effects of the proposed works on the protected site concerned (Supreme Court in CG Fry citing with approval the Court of Appeal judgment in R (Wyatt) v Fareham Borough Council [2022] EWCA Civ 983 at [26]) must require the effects of PFAS contamination on protected sites to be taken into account if there is evidence of a pathway for increased harmful effects on a protected site as a result of PFAS contamination and a risk to the integrity of the protected site cannot be excluded on the basis of objective evidence.

57. In my view, the proximity of both the Site and a SSSI to a watercourse (see Figure 3.1 of the Environmental Designations Plan) is likely to create a pathway for increased harmful effects on the protected site. The Gallos Brook also appears to be a pathway from the Site to the Weston Fen SSSI. Given the levels of PFAS detected in the Brook, the likelihood of a risk to the integrity of that SSSI needs to be assessed.

58. The Developer does not appear to have given any consideration as to whether there would be any increased harmful effect on protected sites resulting from the interaction of the proposed development with prior PFAS contamination, let alone whether such a risk reached the threshold of affecting the integrity of a protected site.

59. With respect to the Developer's suggestions that further assessments can happen at a later stage, there is arguably a heightened obligation not to defer assessments of harm under the Habitats Regulations given that a decision-maker does not have jurisdiction

to grant permission where the development would adversely affect the integrity of a European site. Moreover, the need for public participation in planning precludes the deferral of critical studies on the likelihood of significant effects to the integrity of a protected site to the post-consent stage and would be grounds for quashing a decision.

60. In my view, it follows that the Council does not have adequate information before it on the risks to protected sites to conduct an AA. I therefore consider that the Council cannot grant consent because it cannot discount adverse effects on the integrity of protected sites in the vicinity of the Site.

The Council's obligations under the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017

61. Regulation 33 of the WFD Regulations require local authorities when exercising their functions affecting a river basin district, to have regard to the river basin management plan for that district. This is a procedural duty to genuinely consider the plan as a material consideration in the planning decision-making process, not a substantive prohibition on granting permission where deterioration might occur. The weight to be given to the river basin management plan remains a matter of planning judgment for the local authority.

62. In the context of this application, the Council is therefore required to consider the development proposal in the light of the river basin management plan for the district. In this regard, it is to be noted that the underlying statutory framework of the WFD Regulations is directed toward the prevention of deterioration in the status of water bodies and the protection and enhancement of the water environment. The WFD regime is therefore highly relevant where there is evidence that a proposed development may mobilise, exacerbate or increase the spread of hazardous contaminants into groundwater or surface waters.

63. Moreover, PFOS is identified as a priority hazardous substance (substance 35) in the table of priority substances incorporated into the WFD Regulations by reference to Annex I, Part A of Directive 2008/105/EC as amended by Directive 2013/39/EU. The applicable annual average environmental quality standard for PFOS in inland surface waters is 0.65 ng/L (6.5×10^{-4} µg/L). As noted above, the concentrations identified in Gallos Brook downstream of the Site were many thousands of times greater than that standard.

Conclusions

64. For the reasons set out above, PFAS contamination is plainly a material consideration in the determination of this application. The evidence presently available gives rise to a credible basis for concern that the Site may contain significant historic PFAS contamination associated with former firefighting activities and that there may be pathways to controlled waters and protected ecological receptors.

65. In my opinion, the information presently before the Council is insufficient to enable it lawfully to discharge its obligations under the EIA Regulations, the Habitats Regulations and the WFD Regulations. In particular, there appears to be no adequate baseline assessment of PFAS contamination at the Site, no sufficient assessment of contaminant pathways or likely environmental effects, and no basis upon which the Council could rationally exclude unacceptable risks to human health, groundwater, surface waters or protected sites.

66. Furthermore, the relevant statutory regimes require likely environmental effects to be properly investigated and assessed *prior* to the grant of planning permission. The deficiencies identified in this opinion cannot lawfully be deferred to a post-consent stage by way of condition or later investigation.

67. In those circumstances, and on the basis of the information presently available, I consider that the Council could not lawfully grant planning permission for the proposed development.

[redacted]

28 May 2026

FRANCIS TAYLOR BUILDING

INNER TEMPLE

LONDON EC4Y 7BY

Cherwell DISTRICT COUNCIL NORTH OXFORDSHIRE

PFAS and land contamination at Heyford Park – information for residents

What is PFAS?

PFAS (per- and polyfluoroalkyl substances) are a group of man-made chemicals used in a wide range of industrial processes and consumer products. They are sometimes known as "forever chemicals". This includes chemicals that were historically used in fire-fighting foams, including at airfields and military sites.

How does this relate to Heyford Park?

As part of the Environment Agency's national PFAS research and monitoring programme, the Environment Agency carries out targeted sampling of groundwater and surface water across England to build a national understanding of PFAS in the environment. One of these locations is around 5 km from Upper Heyford. The Environment Agency and local organisations have identified PFAS in local watercourses near Heyford Park. Sampling has found varying concentrations, which may reflect factors such as distance from potential sources and dilution within the water environment.

The former RAF Upper Heyford airbase is known to have used fire-fighting foams in the past.

Is there a risk to health?

At present, there is no evidence to suggest an immediate risk to the health of residents.

Following recent discussions involving the council, the Environment Agency and other partners, Thames Water has advised that:

The drinking water supply serving the Heyford area complies with Drinking Water Inspectorate (DWI) PFAS guidelines. Routine monitoring at the relevant Water Treatment Works (WTWs) has not identified any PFAS concentrations of significant concern, according to the DWI guidelines (no tier 3 results). Based on current evidence, the risk of contamination to drinking water supplies from the nearby airfield is considered to be low. This is because relevant water abstraction points that supply the area are either located a

considerable distance from the airfield or positioned upstream of it which means it's unlikely that contamination can interact with the abstraction source.

Who is responsible for investigating water pollution and drinking water safety?

- The Environment Agency may take samples from rivers and streams when responding to a pollution incident, where appropriate. Where development is proposed, even where the Environment Agency is not a statutory consultee, it works with local planning authorities to help ensure that land and any impacted groundwater are cleaned up to a standard which is suitable for the site's proposed use, both now and in the future. More information on the Environment Agency's role can be found here
- Drinking water standards are set by the Drinking Water Inspectorate (DWI). Further information is available here
- Drinking water at Upper Heyford is supplied by Thames Water via the mains network, not from private water supplies

Have measures to address contaminated land already been taken when granting planning applications at Heyford Park?

Yes.

Where development has already taken place at Heyford Park, land contamination was assessed and remediated where necessary, in line with the legislation and guidance that applied at the time those developments were approved.

What about new or future development at Heyford Park?

For any new planning applications, the council will:

- Assess each application on its own merits
- Require appropriate land contamination investigations, where relevant
- Ensure that testing, remediation and verification are carried out in line with current national guidance
- Take a precautionary and evidence-led approach, particularly for sensitive uses such as housing

If additional investigation or mitigation is required because of PFAS or other contaminants, this will be secured through the planning process.

Where development is proposed on land affected by contamination or land stability issues, responsibility for securing a safe development rests with the developer and/or landowner.

What is the national position on PFAS?

PFAS are recognised as an emerging national issue.

The Government has published a policy paper setting out its approach to managing PFAS and is working towards further national guidance on legacy contamination.

Read further information online

What is the council doing?

Cherwell District Council will continue to:

- Work with expert regulators such as the Environment Agency
- Follow national planning and environmental guidance
- Take a proportionate, precautionary and evidence-led approach
- Ensure land is safe for its intended use through the planning process

If you have a specific concern about this issue that hasn't been answered above, please use our dedicated email address: pfas@cherwell-dc.gov.uk

PFAS Roundtable at Heyford Park

On 24 August 2026, representatives from Cherwell District Council, the Environment Agency, UK Health Security Agency (UKHSA), Oxfordshire County Council, Thames Water, Dorchester Living and other partner organisations met with Callum Miller MP to discuss PFAS contamination associated with Heyford Park.

The discussion focused on how organisations can work together to improve public understanding of the issue, coordinate future investigations and ensure residents have access to clear, trusted and consistent information.

Agreed priorities

Participants identified five key areas where progress is needed:

- Improving understanding of the extent of contamination.
- Developing a clearer picture of impacts on soil, water and the wider environment.

- Improving understanding of potential human exposure pathways and health considerations.
- Providing reassurance through evidence-based investigation and assessment.
- Ensuring residents can access clear and understandable information.

Key outcomes

Commitment to partnership working

Participants recognised that PFAS is a complex emerging issue requiring input from a range of organisations, each with different responsibilities and areas of expertise.

There was broad agreement that continued collaboration between local authorities, environmental regulators, public health organisations, water companies, developers and other stakeholders will be essential as work progresses.

Environmental monitoring

The Environment Agency agreed to review opportunities for additional environmental monitoring and sampling and provide an update to partners.

Participants also discussed the importance of improving public understanding of where environmental investigations have taken place and what information is currently available.

Improved public information

Participants agreed that this webpage should remain the primary source of public information.

Partners will continue to work together to improve the accessibility of information relating to:

- Agency roles and responsibilities.
- Environmental monitoring activities.
- Available evidence and technical information.
- Frequently raised community concerns and questions.

Developing future workstreams

Participants discussed a number of areas that would benefit from further collaborative work, including environmental monitoring, public health and exposure pathways, and public communications.

It was recognised that future arrangements will require appropriate governance structures, clearly defined responsibilities and participation from relevant partner organisations. Several organisations indicated their willingness to contribute specialist expertise as these arrangements develop.

Future specialist input

Participants agreed that future discussions would benefit from input from additional organisations, including the Food Standards Agency (FSA) and the Drinking Water Inspectorate (DWI), to help address questions relating to food production, drinking water and potential exposure pathways.

Next steps

Immediate actions arising from the discussion include:

- Reviewing opportunities for additional environmental monitoring.
- Improving public information regarding organisational responsibilities.
- Exploring ways to present environmental data and findings more clearly.
- Considering appropriate arrangements for future partnership working.
- Continuing collaboration to ensure residents receive clear, accurate and consistent information.

Latest updates - October 2026

The information below includes the latest updates relating to PFAS and matters raised by residents.

PFAS in Cherwell District

We are aware of two locations within Cherwell that may have PFAS contamination due to specific historical usage: Upper Hayford and Islip.

We want to be clear to residents that if any contamination is found in any part of Cherwell, we will ensure it is properly investigated and, where necessary, remediated before development can proceed.

The council will continue to take a precautionary and evidence-led approach. Through the planning process, developers may be required to undertake testing, carry out remediation works and provide independent verification that land is suitable for its intended use before homes or other development are occupied.

Development updates

Former fuel depot at Islip

As an example, a situation was identified at the former fuel depot in Islip. We can confirm that all containers of firefighting foam have been removed from the site. Ground contamination will be addressed through conditions attached to the recent planning permission. Details are available on our planning portal using ref 25/02918/OUT.

Heyford Park investigations

Environmental monitoring and water working group

The first Environmental Monitoring and Water Working Group meeting took place on 16 September 2026. Representatives from the Environment Agency and Cherwell District Council reviewed the available evidence and agreed further work to improve understanding of PFAS in groundwater, surface water, and drainage systems around Heyford Park.

The group identified some actions for the developer, Dorchester Living, which include:

- Carrying out further monitoring of groundwater and surface water, including during wetter conditions
- Improving understanding of drainage connections across the site
- Developing a site-wide conceptual model to help understand how PFAS may move through the environment

The Environment Agency will continue to progress its independent monitoring programme, subject to approvals. Initial results are expected later this year.

Cherwell District Council will continue sampling local private water supplies and the public tap at Upper Heyford. Results will be shared once they have been validated.

A separate Health and Exposure Working Group is being established to consider the monitoring evidence and potential ways people could be exposed to PFAS.

Investigations are continuing and further evidence is being gathered. No definitive conclusions have been reached about health risks, remediation requirements or long-term responsibility.

The next Environmental Monitoring and Water Working Group meeting is scheduled for 28 October 2026. We will publish further updates on this webpage as information becomes available.

Health information

Blood testing

Following recent media coverage relating to PFAS and blood testing elsewhere in the UK, the UK Health Security Agency (UKHSA) has provided the following information:

Why might PFAS be found in people's blood?

PFAS are widely present in the environment and in everyday products. Many people in the UK are therefore likely to have measurable levels of some PFAS in their blood. Exposure can come from several sources, including food, drinking water, air, dust and consumer products.

What does a PFAS blood test show?

A PFAS blood test may show PFAS are present in the body, and exposure has occurred, but it cannot usually identify where an individual's exposure came from, when it happened or what effect it may have on a person's health.

Can a PFAS blood test predict future health problems?

No. Current PFAS tests cannot predict future health outcomes or determine whether PFAS has caused an existing condition. The potential health effects of PFAS exposure remain uncertain, and research is continuing.

Should residents arrange a PFAS blood test?

PFAS are widespread in the environment, and exposure can come from many sources, including food, drinking water, air and everyday products. A blood test cannot identify where exposure came from, predict future health problems or determine the cause of an existing health condition.

PFAS biomonitoring (blood test) is not currently available through the NHS and is not advised through private laboratories, since the tests are unlikely to provide clear information about individual health risk or actionable next steps given how widespread and varied PFAS exposure sources are.

Anyone with symptoms or specific concerns about their health should contact their GP, who can assess them and arrange appropriate care through established clinical pathways.

Further information

For further information, please see the following links:

Perfluoroalkyl and polyfluoroalkyl substances (PFAS): general information - GOV.UK

The health impacts from industrial sources of PFAS: a rapid review - GOV.UK

Roles and responsibilities

Environment Agency +

Specifically regarding PFAS chemicals, the Environment Agency's role includes:

- ensuring compliance with legislative requirements (where the Environment Agency is the competent authority)
- monitoring and advising on the state of the environment
- providing technical advice to Government to support the development of environmental policy
- promoting scientific research in support of these roles
- collaborating with others to generate evidence and sharing our evidence with partners who play a role in managing risks from chemicals

Cherwell District Council +

Cherwell District Council is responsible for:

- Determining planning applications.
- Ensuring that appropriate land contamination assessments are carried out as part of the planning process where required.
- Securing investigation, remediation and verification works through planning conditions where necessary.
- Providing information to residents and coordinating communications with relevant organisations.
- Environmental Health functions within the district.

UK Health Security Agency (UKHSA) +

UKHSA is the government body responsible for providing advice on public health matters.

Its role includes:

- Assessing potential impacts on human health.
- Reviewing scientific evidence relating to PFAS.
- Providing public health advice to local authorities and other organisations where appropriate.

Drinking Water Inspectorate (DWI) +

The Drinking Water Inspectorate regulates drinking water quality in England.

Its role includes:

- Setting and enforcing drinking water standards.
- Overseeing the quality of public water supplies.
- Ensuring water companies meet regulatory requirements.

Developer/landowner +

Developers and/or landowners, in this case, Dorchester Living carry out investigations in support of existing and proposed development at Heyford Park.

Its role includes:

- Carrying out site investigations.
- Assessing potential contamination risks associated with development proposals.
- Preparing technical information to support planning applications.
- Developing any necessary remediation strategies required through the planning process.

Water Companies +

Water companies, in this case, Thames Water is responsible for providing and monitoring public drinking water supplies in the area. The company undertakes routine monitoring of drinking water and is required to comply with standards set by the Drinking Water Inspectorate.

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OXFORDSHIRE RAILFREIGHT INTERCHANGE LIMITED

OXFORDSHIRE SRFI

TECHNICAL NOTE 3: TRIP GENERATION

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CONTENTS PAGE

1.0	**INTRODUCTION**	**4**
2.0	**SITE LOCATION AND ROAD AND RAIL CONNECTIVITY**	**5**
3.0	**PROPOSED DEVELOPMENT**	**6**
	Development proposals	6
	Operation	6
4.0	**TRIP GENERATION: BACKGROUND**	**8**
5.0	**TRIP GENERATION: WAREHOUSING AND DISTRIBUTION UNITS**	**9**
	Base data	9
	Light vehicle trip rates	10
	HGV trip rates	10
	Assessment of mezzanine floor space	11
	Vehicle traffic generation for warehouse and distribution units	12
	Comparison with existing SRFI sites	13
6.0	**TRIP GENERATION: RAIL TERMINAL**	**14**
	Rail terminal light vehicle trips	14
	Rail terminal HGV trips	14
7.0	**INTERACTION BETWEEN RAIL AND WAREHOUSING UNITS**	**15**
	Introduction	15
	Rail and warehousing interaction	15
	Rail terminal daily HGV profile	16
8.0	**TOTAL TRIP GENERATION**	**17**
9.0	**TOTAL TRIP GENERATION WITH TRAVEL PLAN**	**18**

TABLES

Table 1	Agreed vehicle trip rates for warehousing and distribution uses form Northampton Gateway SRFI Transport Assessment
Table 2	Forecast vehicle trips for warehousing and distribution uses (conventional floor space)
Table 3	Additional allowance for vehicle trips for warehousing and distribution mezzanine floor space
Table 4	Total vehicle trips for warehousing and distribution uses (no rail interaction)
Table 5	Light vehicle trips associated with the rail terminal
Table 6	HGV movements associated with the rail terminal
Table 7	Total external HGVs including for interaction between rail and warehousing and distribution uses
Table 8	Total OxSRFI development traffic (no Travel Plan)
Table 9	Total OxSRFI person trips
Table 10	Total OxSRFI development traffic (with Travel Plan)

APPENDICES

Appendix A	Prologis Technical Insight – Jobs
Appendix B	Copy of Table 1 from 'Technical Note 2: Trip Generation', Appendix 5 of Northampton Gateway SRFI Transport Assessment
Appendix C	Intermodality report 'Oxfordshire RFI: rail information and assumptions'

1.0 INTRODUCTION

1.1 ADC Infrastructure Ltd are appointed by Oxfordshire Railfreight Interchange Ltd (the Applicant) to assess the transport and infrastructure requirements of a Nationally Significant Infrastructure Project (NSIP), that being a proposed Strategic Rail Freight Interchange in Oxfordshire, to be known as Oxfordshire Strategic Rail Freight Interchange (OxSRFI).

1.2 Oxfordshire County Council (OCC) are the local highway authority and Highways England have responsibility for the strategic road network (SRN), which in the vicinity of the site comprises the M40, A43 and A34.

1.3 This Technical Note presents the methodology used to determine the road-based trip generation associated with OxSRFI for use in the transport modelling work and Transport Assessment (TA) for the scheme. Trip generation for the scheme was discussed at the Transport Working Group[1] (TWG) meeting held on 13 November 2020. At this meeting Aecom recommended that the trip generation follow a similar methodology to that used on the recently consented Northampton Gateway SRFI. This Technical Note therefore adopts that approach. The document is structured as follows:

- Section 2 sets out the site location and the road and rail connectivity.
- Section 3 details the development proposals.
- Section 4 provides a description of the type of trips that the development would generate.
- Section 5 sets out the trip generation for the warehousing and distribution uses at the site.
- Section 6 sets out the trip generation for the rail terminal.
- Section 7 sets out the interaction between the rail terminal and the warehousing uses and the total traffic flow without considering the effect of the Travel Plan.
- Section 8 sets out the total person trip generation.
- Section 9 identifies the total traffic flows including for the effect of the Travel Plan.

[1] A Transport Working Group has been established to provide a forum for discussion and allow a step-by-step approach to the assessment and agreement of transport matters relating to OxSRFI. The TWG comprises representatives from OCC, Highways England and their consultant Aecom, the Applicant and their consultant team, comprising ADC Infrastructure Ltd, BWB Consulting Ltd, and Oxalis Planning.

2.0 SITE LOCATION AND ROAD AND RAIL CONNECTIVITY

2.1 The OxSRFI site is in Cherwell District Council, within northern Oxfordshire. It is located to the southwest of M40 Junction 10, approximately 6km from Bicester. A general site location plan is shown at **Figure 1**.

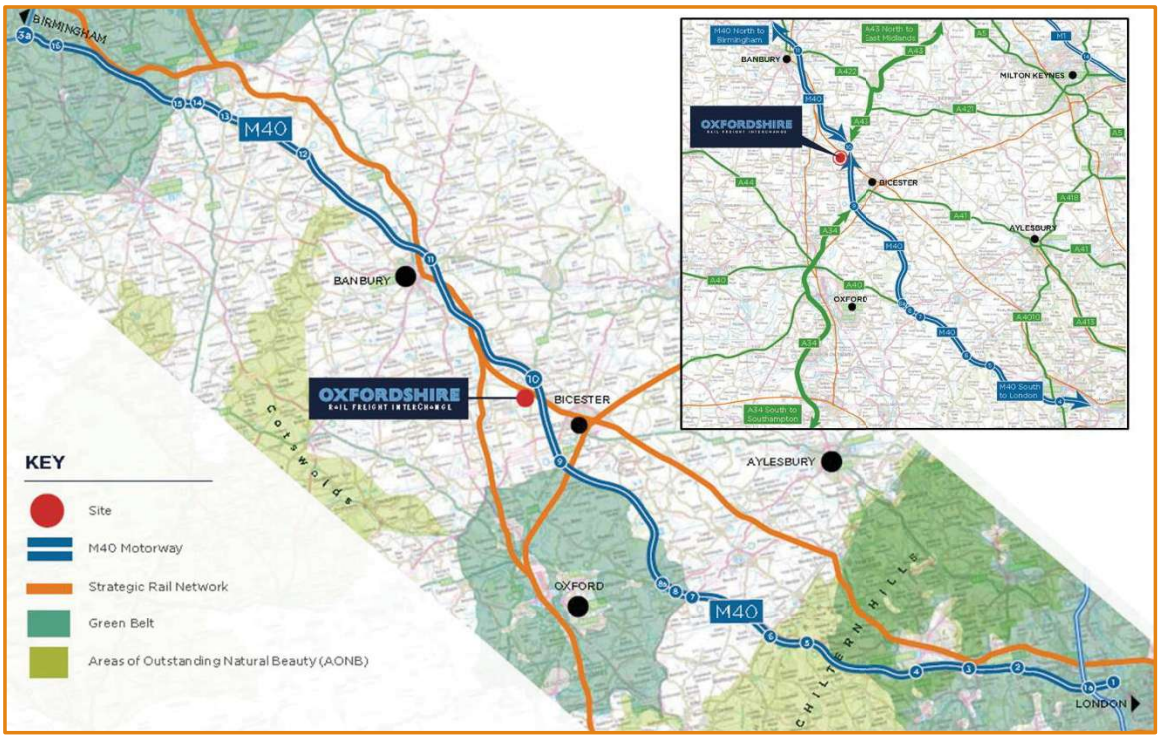


Figure 1: general site location

2.2 The site is bounded to the north by the Chiltern Main Line railway, part of the strategic rail network operated by Network Rail (**Figure 2**). The Chiltern Main Line Railway is configured as a two-track railway which passes the site in cutting. Passenger trains operate at up to 100mph and freight trains at up to 70mph. To the east, the site is bounded by the B430 and the Viridor 'Ardley Energy from Waste' facility, to the south by farmland, and to the west by the Heyford Park development, which is located on the former RAF Upper Heyford site. The village of Ardley is approximately 1km to the north of the site. The village of Middleton Stoney is approximately 2km to the south of the site.

2.3 The closest point of access to the SRN from the site is at Junction 10 of the M40, approximately 3.5km to the north of the site when accessed via the B430. At Junction 10 there is also direct access to the A43. The M40 connects to Birmingham (and the M42 and M5) to the north, and the M25 and London to the south. The A43 heads northeast from M40 Junction 10 and connects to the M1 at M1 Junction 15A.

2.4 Although less direct, access to the M40 could also be possible via Junction 9, which is a 10.5km drive to the south of the site, when accessed via the B430, passing through the village of Middleton Stoney, and then via the B4030 and then the A41.

2.5 To the south of the site the A34 runs in a northeast to southwest direction and connects Bicester to Oxford. It continues further south, connecting with the M4 at Newbury and the M3 at Winchester. The B430 runs between the A34 to the south and Junction 10 of the M40 to the north.

3.0 PROPOSED DEVELOPMENT

Development proposals

3.1 The OxSRFI would provide a rail freight terminal accommodating trains of up to 775m long, and include container storage and HGV parking, with rail sidings within the site with the potential to serve some of the individual warehouses. It would provide 6.5 million sqft of predominantly large scale B8 warehousing and distribution space. The scheme will also provide substantial mounding and woodland/tree planting around the site edges for visual screening and ecological connectivity.

3.2 The maximum floor space for the B8 use will be set by the Parameters Plan at 6.5 million sqft (603,850 sqm). The warehousing will include ancillary B1 office space, and an allowance will be made within the Parameters Plan for up to one third of the warehouses (201,283 sqm) to provide B8 mezzanine floor space use.

3.3 The OxSRFI scheme will accommodate 12 freight trains per day. The freight terminal would be connected to the Chiltern Main Line Railway, part of the strategic rail freight network.

Operation

3.4 All the B8 units are likely to operate on a 24-hour basis, seven days a week. The main shifts are therefore likely to be 0600-1400 hours, 1400-2200 hours and 2200-0600 hours, although there will be some variation depending on the individual occupier requirements. Some occupiers may operate a 12-hour shift, for example from 0700-1900 hours and 1900-0700 hours.

3.5 Mezzanines are typically introduced to enhance access to existing high level storage areas, or to house automated operations. In each case, these functions would not result in a pro-rata increase in staff numbers compared to conventional floor space. The former because, in the absence of mezzanine levels, high level storage is typically used to access the warehouse space. The latter, because automated operations are less staff intensive. It is possible that part of the mezzanine floor space would be used to house the ancillary office functions within the warehousing. However, the ancillary office space would be a small proportion of the floor space (typically less than 5%). Hence if the ancillary office were housed within the mezzanine level, it would not lead to a significant 'freeing-up' of general warehousing space.

3.6 HGV generations are related to the number of loading bays, which would not be increased. Hence, whilst the mezzanine levels may include automated operations which could improve efficiency and HGV throughput, there would not be a pro-rata increase in HGV numbers as these would be restricted by the number of loading bays.

3.7 In keeping with most inland rail freight terminals, the rail freight terminal is likely to operate on a 24-hour basis from Sunday evenings until Saturday mornings. However, volume growth at the main ports could lead to an increase to 24/7 operation in the future.

3.8 For the purposes of assessment, to ensure a robust approach, maximum capacity has been assumed to occur within the time period set for the transport modelling process, which in accordance with DfT Circular 02/2013[2] adopts an opening year of 2026 and a forward planning year of 2031. The latter has been selected to coincide with the end of the Local Plan period. In

[2]Circular 02/2013 'The Strategic Road Network and the Delivery of Sustainable Development' Department for Transport, September 2013

reality, due to the wider aspirations for SRFI sites, and the gradual increase in both the number of trains that can be accommodated on the wider network and the train's capacity, it is anticipated that it would be a number of years after this before the rail freight terminal would operate at full capacity.

3.9 Initially the loading and unloading of containers to and from the trains at the rail terminal would be by reach stacker, which would be replaced by gantry cranes as volumes and through-put at the rail terminal increased.

3.10 The loading and unloading of containers to and from the rail vehicles on pads adjacent to the individual warehouse units, if required by the end users, is expected to be by reach stacker operation.

4.0 TRIP GENERATION: BACKGROUND

4.1 This section describes the development vehicle trip types, and it describes the methodology for calculating the forecast traffic generation of the proposed OxSRFI scheme.

4.2 Given the size and nature of the proposed development it is not appropriate to use the TRICS database to calculate the trip rates and traffic generation for the OxSRFI, as there are no comparative rail served sites within the database.

4.3 Therefore, reference has been made to the work undertaken for the recently consented Northampton Gateway SRFI at M1 Junction 15 in Northamptonshire. The trip generation for the Northampton Gateway SRFI was calculated using a first principles approach, combined with existing data from similar sites[3]. The calculation methodology and resulting trip generations were agreed by the Transport Working Group for the Northampton Gateway SRFI, which comprised Highways England and Northamptonshire County Council. The trip generation was approved and accepted as part of the Development Consent Order (DCO) for Northampton Gateway SRFI.

4.4 Aecom have also recommended that the OxSRFI trip generation follow a similar methodology to that used Northampton Gateway SRFI. Therefore, that approach has been adopted for the OxSRFI development.

4.5 The proposed OxSRFI, comprising both the warehousing units and the rail terminal, would generate the following type of trips:

1. Employee trips to and from work at both the B8 units and the rail terminal.
2. Visitor and delivery trips to both the B8 units and the rail terminal.
3. HGV traffic to and from the B8 units.
4. HGV traffic to and from the rail terminal.
5. HGV (or tug) traffic between the rail terminal and the B8 units.
6. Rail trips to and from the rail terminal and the rail served warehousing.

4.6 Only trip types 1 to 4 would use the off-site highway network. Trip type 5 would be on the estate road network internal to the OxSRFI site, between the rail terminal and warehousing area. Trip type 6 would be on the rail network only, and the capacity of the rail network and the impact of these trips will be examined in a separate report[4].

4.7 This Technical Note therefore focuses on trip types 1 to 4, as the TA is ultimately concerned with the impact of the development on the off-site highway network. However, it is recognised that the number of HGVs generated (trip types 3, 4 and 5) will be related to the number of rail trips (trip type 6), the numbers of containers passing through the rail terminal, and the operation and interaction between the rail terminal and the on-site warehousing.

4.8 The above dependencies and interactions are examined at Section 7 of this Technical Note, but first the warehousing and rail terminal elements of the proposed OxSRFI are considered in isolation at Sections 5 and 6, respectively.

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[3] Report ref ADC1475 TN2 v4 'Technical Note 2: Trip Generation', Appendix 5 Northampton Gateway SRFI Transport Assessment.

[4] For the rail component at OxSRFI, the Applicant is in discussions with Network Rail to evaluate the engineering and operational viability of connecting into their network and evaluating path availability through a typical 24-hour cycle.

5.0 TRIP GENERATION: WAREHOUSING AND DISTRIBUTION UNITS

Base data

5.1 The Homes and Communities Agency's (HCA) employment density guide (3rd edition 2015) sets out that B8 warehousing uses at national, regional and final mile distribution centres typically accommodate 1 full time equivalent employee per 95sqm, 77sqm and 70sqm, respectively. These figures are based on gross external area (GEA).

5.2 ProLogis also have empirical data on this subject, collected in 2010 and 2014, the latter from the occupiers of 24 of their B8 units (which have a total GFA of 6.05 million sqft). A copy of the ProLogis Technical Note detailing the research findings is contained in **Appendix A**. This confirms that their B8 unit occupiers typically accommodate between 1 employee per 77sqm (2010) and 1 employee per 69sqm (2014). However, most of the units included in the ProLogis Note are smaller than the units that would be constructed at OxSRFI and hence the ProLogis findings are likely to be biased towards the higher end of the employment density range.

5.3 Nevertheless, the ProLogis Technical Note provides a useful indication of the potential split between employee roles. It confirms that warehouse operatives form the majority (50%) of the workforce. Drivers account for around 8% of staff, 21% are admin staff or managerial staff working in the ancillary offices, with 21% represented in the others category (comprising IT, customer service, sales and engineering functions). The Note compares this breakdown with data available from 2003 Cranfield University research and concludes that there has, in recent years, been a positive trend in both the quantity and breadth of jobs provided by B8 warehousing and distribution uses.

5.4 The end occupiers at OxSRFI are not yet known and the development is likely to contain a mixture of distribution centre types. However, the form and location of OxSRFI, combined with the large size of the proposed units, means that these centres are more likely to be national and regional in nature. Therefore, when considering an appropriate employment density for the warehousing at the site, a balanced view should be taken between the lowest (1 per 95sqm) and highest (1 per 70sqm) density range. Adopting the central ratio of 1 full time employee per 77sqm of GEA, that is suggested for regional distribution centres provides a robust figure for assessment purposes.

5.5 Based on this information, it is reasonable to apply the 1 per 77sqm ratio to the proposed GFA of B8 use at OxSRFI site to provide an estimate of the number of employees that would be associated with warehousing at the site. If the 603,850 sqm GFA represents 95% of the GEA, then OxSRFI would have a GEA of 635,632 sqm for the warehousing elements of the scheme. This equates to 8,255 full time equivalent employees associated with the proposed B8 use, based on 1 full time employee per 77sqm of GEA.

5.6 However, there is a difference between the total number of employees, and the number attending during any one time period. To calculate the traffic generation of the employees, it is necessary to obtain a daily profile of trip rates per employee or per 100sqm. As discussed at paragraphs 4.3 and 4.4, this has been calculated using the trip rate profile agreed for the Northampton Gateway SRFI.

5.7 Northampton Gateway SRFI used trip rates derived from Swan Valley Industrial Estate, which is located adjacent to Junction 15A of M1 in Northampton. At the time of the traffic count the Swan Valley site had the following characteristics:

- it included a number of large-scale warehouses, comprising nearly 1.5 million sqft GFA;
- it had an employee density of 1 employee per 77sqm;

- the majority of units at the site operated three shift system (6 – 2 – 10), however Morrisons (formerly Sainsbury's) adopted an extended 12-hour two shift patterns (7 to 7), and therefore provided a robust shoulder peak trip rate; and
- it had no bus service, with low pedestrian and cycle usage (3%), with a single occupancy car driver usage rate of 92%, and car passenger modal share of 5%, providing a robust car usage figure as a base starting point.

Light vehicle trip rates

5.8 To provide a robust assessment for the light vehicle trips (predominantly employee journeys), the Swan Valley vehicle trip rates per 100 employees, was first used to calculate an equivalent trip rate per 100sqm GFA, based on the HCA ratio of 1 full time equivalent employee per 77sqm of GEA (635,632sqm). This ensured that there was correlation with the HCA employee ratios. This resulted in slightly evaluated vehicle trip rates per 100sqm of GFA.

5.9 As part of the Northampton Gateway SRFI work a comparison of the resultant vehicle trip rates per 100sqm GFA derived from the Swan Valley data to trip rates from other available B8 sites was undertaken. That comparison is reproduced below.

comparison of Swan Valley light vehicle trip rates per 100sqm to average of all survey sites									
	am peak (0800 to 0900 hrs)			pm peak (1700 to 1800 hrs)			daily (24 hrs)		
	arrive	depart	two-way	arrive	depart	two-way	arrive	depart	two-way
average of sites	0.087	0.036	0.124	0.032	0.083	0.115	0.978	1.102	2.080
Swan Valley	0.128	0.014	0.142	0.031	0.114	0.145	1.119	1.101	2.220

5.10 The comparison demonstrated that the trip rates for Swan Valley were higher than the average trip rates determined across all the survey sites. In addition, it was found that the Swan Valley vehicle trip rates produce a distinctly elevated inbound vehicle trip rate in the morning peak hour and an elevated outbound vehicle trip rate in the evening peak hour. The correlation of these elevated values with the direction of peak tidal flow (inbound in the morning peak hour and outbound in the evening peak hour), was considered to add further robustness to the assessment. A copy of Table 1 from the Northampton Gateway trip generation technical note, showing the comparison sites, is provided at **Appendix B**.

5.11 It was concluded as part of the Northampton Gateway work that the resultant light vehicle trip rates were robust and therefore suitable to represent the large-scale warehousing and distribution units at an SRFI. The trip rates and assessment methodology were accepted by Highways England and Northamptonshire County Council. The agreed daily light vehicle trip rate profile for is provided at **Table 1** at the end of this technical note.

HGV trip rates

5.12 For the HGV movements, which are principally dependent on the size of the warehouse units and number of loading bays, the trip rates were calculated from the Swan Valley date on a per 100sqm of GFA basis.

5.13 In similarity to the light vehicle trip rates, a comparison of the derived HGV trip rates to trip rates for ither B8 sites was undertaken. That comparison is reproduced below.

comparison of Swan Valley HGV trip rates per 100sqm to average of all survey sites									
	am peak (0800 to 0900 hrs)			pm peak (1700 to 1800 hrs)			daily (24 hrs)		
	arrive	depart	two-way	arrive	depart	two-way	arrive	depart	two-way
average of sites	0.024	0.022	0.046	0.021	0.019	0.040	0.319	0.277	0.596
Swan Valley	0.012	0.015	0.028	0.013	0.016	0.029	0.306	0.316	0.623

5.14 The comparison showed that Swan Valley has a peak hour HGV profile that is below the average, but that the daily HGV trip rate is above average. It was found that in the morning peak hour the two-way HGV trip rate was 64% lower than the average and in the evening peak hour it was 37% lower. Therefore, to ensure a robust assessment of the peak hour HGV generations, the average HGV trip rates were adopted for the peak hour periods. This also had the effect of increasing the overall daily HGV trip rates, providing further robustness to the assessment.

5.15 The HGV trip rates, and assessment methodology were accepted by Highways England and Northamptonshire County Council. The agreed daily HGV trip rate profile (including the adjusted peak hour HGV trip rates) is provided at **Table 1** at the end of this technical note.

Assessment of mezzanine floor space

5.16 OxSRFI would provide 6.5million sqft (603,850 sqm) of conventional B8 floor space use. However, to provide some flexibility for future occupiers seeking mezzanine space, the Parameters Plan will also include an additional allowance for approximately one third of the units (201,283 sqm) to provide mezzanine floor space.

5.17 The Applicant does not hold empirical data regarding mezzanine trip rates and no empirical trip rate information was available at the time of the Northampton Gateway SRFI DCO. It is also noted that the employee density for B8 uses given in the HCA employment density guide are based on GEA, which is not influenced by mezzanine floor space.

5.18 Taking the above into account, along with the operational characteristics of mezzanine floor space as explained at paragraphs 3.5 and 3.6, it was agreed with Highways England and Northamptonshire Council County as part of the Northampton Gateway DCO that, for assessment purposes, the mezzanine floor space be treated as generating trips at 50% of the rate of conventional floor space. This recognised that the mezzanine floor space would not add to the GEA of the units and hence, based on the HCA definition of employee densities, would not generate additional trips, whilst still providing a robust position in the absence of empirical data. The 50% factor allows for the mezzanine floor space to generate additional employee and HGV trips, but not be at pro-rata levels compared to conventional floor space.

5.19 Notwithstanding that the HCA guidance on employment densities being unaffected by mezzanine floor space, should the additional mezzanine floor space be assumed to generate vehicle trips at a rate of 50% of conventional floor space, then if follows that this must be equated to additional employee trips. In which case, adopting the 50% ratio, the mezzanine floor space allowance could equate to a further potential 1,307 full time employees at OxSRFI.

5.20 Should empirical data on the trip generation characteristics of mezzanine floor space become available in the future it may allow a re-calibration of the mezzanine floor space allowance for the OxSRFI site based on the traffic generations assumed in this technical note.

Vehicle traffic generation for warehouse and distribution units

5.21 The resulting daily vehicle traffic generation profile for the conventional floor space at the B8 units, based on a GFA of 603,850 sqm is shown at **Table 2** at the end of this technical note. The resulting daily vehicle traffic generation profile for the additional mezzanine floor space, based on the additional floor area and 50% trip generation ratio given above, is shown at **Table 3**. The total trip generation (the sum of Tables 2 and 3) is provided at **Table 4**.

5.22 **Table 4** identifies that in the evening, the hourly periods (the shoulder periods) either side of the 1700 to 1800 peak hour are forecast to generate higher light vehicle traffic flows than the traditional 1700 to 1800 peak hour period. The earlier shoulder peak hour of 1600 to 1700 hours has a higher departure rate and the greater total traffic generation. Therefore, in accordance with the same approached adopted for the Northampton Gateway DCO, to ensure a robust assessment of the light vehicle trips, the light vehicle trip generation associated with the shoulder peak hour 1600 to 1700 have been swapped with the light vehicle trip generation for the 1700 to 1800 peak hour. This ensures that any potential overlap of the shoulder peak with the highway network peak hour is considered. This is not an issue in the morning peak hour, where the shift change occurs much earlier.

5.23 On this basis, the peak hour and daily trip rates and traffic generation that are proposed for the warehousing and distribution units are summarised in the tables below.

peak hour and daily vehicle trip rates for B8 uses per 100sqm/GFA (no interaction with rail terminal)									
period	light vehicles			heavy vehicles			total vehicles		
	arrive	depart	2-way	arrive	depart	2-way	arrive	depart	2-way
AM peak	0.128	0.014	0.142	0.024	0.022	0.046	0.152	0.036	0.188
PM peak*	0.042	0.147	0.190	0.021	0.019	0.040	0.063	0.167	0.230
daily	1.119	1.101	2.220	0.326	0.326	0.652	1.445	1.427	2.872

peak hour and daily vehicle trip generation for B8 uses (no interaction with rail terminal)									
period	light vehicles			heavy vehicles			total vehicles		
	arrive	depart	2-way	arrive	depart	2-way	arrive	depart	2-way
AM peak	903	97	1,000	169	155	324	1,072	252	1,324
PM peak*	298	1,038	1,336	148	134	282	446	1,172	1,618
daily	7,884	7,756	15,640	2,293	2,296	4,589	10,177	10,052	20,229

* higher light vehicle trips for shoulder peak of 1600 to 1700 hrs used in place of the lower 1700 to1800 hr trip rates, thereby ensuring a robust assessment of the development and highway network peak period combined.

5.24 It has been agreed with the Transport Working Group that the traffic generated by the proposed development in the hour before both the AM and PM peak hour is also modelled as part of the strategic transport modelling[5]. This will ensure that the highway conditions generated by the development traffic in the pre-peak are passed into, and therefore represented in, the peak hour assessment. The pre-peak traffic flows are provided at Section 8 of this technical note.

[5] The strategic transport modelling will be undertaken using the Bicester Transport Model (BTM). The BTM is a 2hr model and hence both the pre-peak hour and peak hour development traffic will be represented in the model.

Comparison with existing SRFI sites

5.25 As part of the review of version 2 of this technical note, Highways England have confirmed that the trip rates presented form a good basis to assess the impact of the proposed OxSRFI scheme and are acceptable to them in principle. However, Highways England also asked whether ADC had considered whether fresh traffic survey data could be collected at comparable SRFI sites, such as DIRFT or East Midlands Gateway SRFI, to provide further confidence to the assessment.

5.26 It is not possible to undertake meaningful survey work at existing sites without an on-site presence and detailed information regarding a development, such as the amount of floor space occupied at the site, mezzanine floor space constructed, and current operations of the rail terminal. This is particularly the case for East Midlands Gateway SRFI, which is not yet fully built out and hence there is uncertainty regarding occupancy and operation. There is also an element of commercial sensitivity surrounding such information, and hence new survey work was not considered a viable option at East Midlands Gateway.

5.27 Survey work was, however, undertaken at DIRFT as part of the DCO for the recently approved West Midlands Interchange SRFI[6]. The external vehicle trip rates for the B8 uses at DIRFT were determined based on the results of traffic surveys undertaken in 2016. The resultant trip rates have been extracted from that work and are provided below.

peak hour and daily vehicle trip rates for B8 uses per 100sqm/GFA based on DIRFT survey									
period	light vehicles			heavy vehicles			total vehicles		
	arrive	depart	2-way	arrive	depart	2-way	arrive	depart	2-way
AM peak	0.072	0.012	0.084	0.017	0.016	0.032	0.089	0.028	0.117
PM peak	0.040	0.059	0.099	0.017	0.022	0.038	0.057	0.081	0.137
daily	0.834	0.821	1.655	0.382	0.366	0.748	1.216	1.187	2.403

5.28 Comparison of the above surveyed DIRFT vehicle trip rates to those proposed for OxSRFI that are given at paragraph 5.23 above provides further confidence that the proposed OxSRFI trip rates are robust.

[6] Table 12 and Table 16, Document 6.2, The West Midlands Rail Freight Interchange Technical Appendix 15.1 – Transport Assessment, WSP July 2018

6.0 TRIP GENERATION: RAIL TERMINAL

Rail terminal light vehicle trips

6.1 The rail terminal would employ a small number of staff, typically between 10 to 20 employees per shift. Therefore, an average of 15 employees per shift (0600 to 1400 hours, 1400 to 2200 hours, and 2200 to 0600 hours) is assumed.

6.2 **Table 5** provides summary of the light vehicle movements associated with the rail terminal employees.

Rail terminal HGV trips

6.3 The number of HGVs generated by the rail terminal would depend on the number of trains and the length of each train using the rail terminal, as this will dictate the number of containers that each train can carry.

6.4 An HGV can carry two 20ft containers, or one 30ft/40ft/45ft container at a time. A HGV will either:

- arrive at the rail terminal empty, departing with a container (or containers);
- arrive at the rail terminal with a container (or containers), and depart empty; or
- arrive loaded with a container (or containers) for drop off and depart loaded with a new container (or containers).

6.5 From the above it can be seen that there is a container to HGV handling ratio. The Applicant has commissioned Intermodality to provide advice in relation to the operation of the rail terminal. As part of that work, Intermodality have prepared a report detailing the interrelationship between rail and road activity that would be associated with the rail terminal. A copy of the Intermodality report[7] is provided at **Appendix C**. Paragraph 1.8 of the report identifies that container to HGV handling ratios have fallen from around 1.3 HGVs to 1 container (2006 data), to a ratio of 1.1 HGVs to 1 container in 2020. This has resulted from a drive for efficiency to reduce the number of empty HGV movements to and from rail terminals. Based on the Intermodality findings, the recent 1.1 HGV to 1 container ratio has therefore been adopted in this technical note.

6.6 Based on the findings from the Network Rail Freight Market Study, paragraph 1.7 of the Intermodality report identifies that the average number of containers per train will increase from the 2011/12 baseline of 34 containers per train, to 41 containers per train by 2023/24, and then remain constant beyond this. The increase is assumed to reflect a continued drive for efficiency by the train operating companies, including the use of longer trains from 500m towards 640m and in some cases maximum 750m in length (775m including locomotives).

6.7 Based on the above, as calculated at paragraph 2.6 of the Intermodality report, each train would accommodate an average of 41 containers. This is equivalent to:

- 46 HGVs per trainload delivering and exporting containers from the rail terminal
- 92 HGV trips per trainload (46 inbound and 46 bound) at the rail terminal
- 1,104 HGV trips per day (based on a maximum of 12 trains per day using the rail terminal).

6.8 The rail terminal would therefore lead to a mode shift from long haul road freight to rail freight equivalent to 1,104 HGV trips per day (552 HGVs inbound loads and 552 HGVs outbound loads).

[7] 'Oxfordshire RFI: rail information and assumptions', Intermodality, January 2021.

7.0 INTERACTION BETWEEN RAIL AND WAREHOUSING UNITS

Introduction

7.1 This section identifies the interaction between the rail operation and the warehousing and distribution operations that would occur at the OxSRFI site.

7.2 Containers arriving at OxSRFI by rail (or vice versa) will typically be processed on the terminal in the following ways:

- Train to HGV for direct transhipment to a final destination with no added value on site. It is assumed that this type of operation would take place at the rail terminal, as opposed to being undertaken at a direct rail served warehouse.
- Train to warehouse for breaking down, warehousing and then onward transhipment to either a final destination (typically currently road based), or onwards distribution to regional distribution centres (traditionally road based, but with clear indications of movement to rail). This operation has potential to take place either on the main terminal, where a warehouse occupier does not require a dedicated rail siding alongside the warehouse, or at a direct rail served warehouse.
- Train to stack on the pad (or designated container storage area), and from stack to destination either by road or rail. Again, is assumed that this type of operation would take place at the rail terminal.

7.3 Container movements to the individual warehouse units on the site would either be direct to the individual warehouse unit (or plot) by rail, by means of an adjacent rail siding, or by delivery of the containers to the rail terminal, with the containers then being transferred by HGV (or tug) between the rail terminal and warehouse units.

Rail and warehousing interaction

7.4 The DCO for Northampton Gateway SRFI used evidence from DIRFT to consider the above interrelationships between rail and the warehouses. Two snap shots of the operations at DIRFT were considered.

7.5 The first snapshot came from roadside interviews undertaken in February 2010 at DIRFT rail terminal at part of the DIRFT III Expansion, that identified the origin of HGV arriving at the facility and the designations of HGVs departing the facility. The survey found that 31% of HGVs were starting from, or destined for, other locations within DIRFT. This survey predated the rail-connected Tesco distribution centre coming on-line at DIRFT.

7.6 The second snapshot based on more recent data from DIRFT, established that the warehousing at a modern SRFI should be capable of capturing up to 56% of container traffic handled by the rail terminal.

7.7 Based on the above, for the Northampton Gateway SRFI, a more conservative average figure of 40% was adopted in the assessment work. This was approved by Highways England and Northamptonshire County Council as part of the traffic generation work, which in turn was approved by the Planning Inspectorate as part of the DCO submission for the Northampton Gateway SRFI scheme.

7.8 Paragraph 1.9 of the Intermodality report (**Appendix C**) also references that one third figure from the first DIRFT snapshot, and notes that 2020 data from iPort SRFI in Doncaster confirms that a small percentage (2.4%) of total container traffic arrived at the site by road and then departed again by road.

7.9 Based on this information the Intermodality report recommends that for OxSRFI it would be appropriate to assume that 35% of the container traffic would be captured at the site.

7.10 Therefore, the following assumptions have adopted for the assessment of HGV trips associated with the rail operations at the OxSRFI site:

- 35% of HGV trips remain on site, to and from the warehousing; and
- 65% of HGV trips travel to and from the hinterland.

Rail terminal daily HGV profile

7.11 Of the operations described in paragraph 7.2, only a lift from the train direct to HGV (assume worst case 65%) would provide a direct correlation between train and HGV movements. If the lifted container is either transferred to a warehouse (35%) or to stack (no data) any HGV movement arising would be totally independent of train arrival and departure times.

7.12 It is impossible to say with certainty at this stage the split of container movements or the final pattern of local distribution for the OxSRFI site, as this will depend on a combination of the appointed terminal operator, end customer requirements and inter relationship with other SRFI sites and their sphere of operations.

7.13 Based on the assessment of 1,104 HGV movements associated with the rail terminal (12 trains per 24 hours) as identified in Section 7, the following assessment can be made of operations assuming 35% of all containers handled at the terminal have an origin and destination within the OxSRFI site and 65% have an origin and destination off-site:

- 35%, 386 HGV trips remain on site for add on value operations prior to onward distribution (193 trips to and from the warehousing and the rail terminal). It is assumed that onward distribution would be via road, with HGV timing being totally independent of train times.
- 65%, 718 HGV trips travel external to the site (359 arrivals and 359 departures to and from the rail terminal) and would be directly linked to train arrival times.

7.14 The timing of train arrivals and departures is not known in detail as train paths and hence arrival and departure times will depend on a combination of end user requirements, paths bid from Network Rail by the Freight Operator to meet the end customer needs and the paths granted by Network Rail. For the assumed 65% of containers that go out by road direct from train it is not therefore possible to be precise at this stage on times of day.

7.15 Due to the inability to state with certainty at this stage exactly how HGV movements would correlate with train arrivals and departures it is considered that the best indicator of associated HGV movements can be derived from how other similar terminals within the UK operate and the HGV trip generation that ensues. This was the approach adopted at Northampton Gateway SRFI, where data from the rail terminal at Hams Hall was used.

7.16 Since then, data is also available from iPort SRFI, and this is included at Figure 2 of the Intermodality report alongside the Hams Hall data. An average of data is provided, and this has been used to determine a daily profile of HGV movements associated with direct rail to HGV movements at OxSRFI. The resulting HGV profile for the external HGV trips (65%) associated with the rail terminal at OxSRFI is shown at **Table 6**, at the rear of this report.

8.0 TOTAL TRIP GENERATION

8.1 The internalised HGV trips would be independent of the train times and, as they would not appear on the off-site highway network, they are deducted from the total HGVs that would be generated by the warehousing and distributions units operating in isolation. This is summarised at **Table 7** at the rear of this report.

8.2 In total, it is forecast that OxSRFI would generate 4,920 external two-way HGV trips per 24 hours, with morning and evening peak hour external HGV flows of 331 and 300 two-way movements, respectively.

8.3 Combining the external HGV trips (**Table 7**) with the light vehicle movements (**Tables 4 and 5**) gives the total development vehicle trip generation. This is shown at **Table 8** at the rear of this technical note and it is also summarised below for the pre-peak and peak hour periods and across the day.

total development pre-peak hour, peak hour, and daily vehicle trips (no Travel Plan)									
period	light vehicles			heavy vehicles			total vehicles		
	arrive	depart	2-way	arrive	depart	2-way	arrive	depart	2-way
AM pre-peak	665	211	876	124	157	280	789	368	1,156
AM peak	903	97	1,000	172	159	331	1,075	256	1,331
PM pre-peak	217	806	1,023	132	89	221	349	895	1,244
PM peak	298	1,038	1,336	157	143	300	455	1,181	1,636
daily	7,929	7,801	15,730	2,459	2,461	4,920	10,388	10,262	20,650

8.4 To calculate the overall person trips associated with the development, the light vehicle trips given at **Table 8** have been converted to person trips based on the 92% single occupancy vehicle (SOV) modal split characteristic detailed in Section 5. As the main purpose of an HGV trip is the transportation of its cargo, the HGV trips are excluded from this calculation.

8.5 The resultant person trip generation is given at **Table 9** for the peak hour periods.

8.6 Adding back in the HGV trips, overall, it is forecast that OxSRFI would generation 22,098 two-way daily person trips, with 1,418 and 1,752 two-way person trips forecast in the morning and evening peak hour periods.

9.0 TOTAL TRIP GENERATION WITH TRAVEL PLAN

9.1 It is proposed that the Travel Plan for the OxSRFI will include a target to reduce reliance on the private car by 10%. This target is consistent with the 9.3% targeted reduction in single occupancy car trips identified in the Commercial Travel Plan[8] for the Heyford Park development, which is located adjacent to the OxSRFI site. This will be achieved at OxSRFI through the Public Transport Strategy and the promotion of car sharing, cycling and walking at the development.

9.2 Paragraph 25 of Circular 02/2013 sets out that the overall forecast demand against which traffic impacts on the Strategic Road Network should be assessed, should include for *"…any reduction arising from any travel plan or demand management measures that are being proposed".* Therefore, it is appropriate to allow for the effect of the Travel Plan on the forecast vehicle trip generation.

9.3 A 10% reduction in the baseline 92% SOV trips, equates to a 9.2% modal shift and hence an initial target SOV modal split of 82.8%.

9.4 Applying this to the person trips (excluding HGV trips) at **Table 9**, the resultant vehicle trip generation can be calculated (including allowance for the Travel Plan). This is shown at **Table 10** at the rear of this technical note and is also summarised below for the peak hour periods and across the day.

total development peak hour and daily vehicle trips (with Travel Plan)									
period	light vehicles			heavy vehicles			total vehicles		
	arrive	depart	2-way	arrive	depart	2-way	arrive	depart	2-way
AM peak	813	87	900	172	159	331	985	246	1,231
PM peak	268	934	1,202	157	143	300	425	1,077	1,502
daily	7,136	7,087	14,233	2,459	2,461	4,920	9,595	9,549	19,144

9.5 The above traffic flows represent the likely traffic generation for OxSRFI once the effect of the Travel Plan is considered.

9.6 However, to provide a robust assessment, Highways England requested that the travel plan reductions considered above are not applied to the vehicle traffic generations used in the Transport Assessment. This was agreed with OCC at the Transport Working Group meeting held on 11 March 2021. Therefore, the vehicle trip generations without the Travel Plan that are given at **Table 8** of this technical note are the development traffic flows to be used for modelling and assessment purposes.

[8] Heyford Park Commercial Travel Plan, April 2018 Revision 5, Peter Brett Associates. Table 7.2 gives the 2017 surveyed modal share for single occupancy car trips as 87.1%, and the target single occupancy car modal share of 79%. This is an 8.1 percentage point reduction, which equates to a target 9.3% reduction in single occupancy car trips (8.1/87.1 = 9.3%).

Protest as rail freight scheme planning process starts



Campaigners gathered outside the Bicester Hotel holding an inflatable horse

29 September 2026

Campaigners have protested against plans for a new rail freight interchange as a planning inspectorate process got under way.

The application for the facility near Ardley, Oxfordshire, includes 6.5 million sq ft of warehouses and a hub to transfer goods from roads to the railway line.

Protestor Philip Norstrand said there were fears the project "has very little to do with rail freight".

The Oxfordshire Strategic Rail Freight Interchange (OxSRFI) said the proposal was "a response to the government's ambitions to maximise the use of rail freight in the supply chain".

As the plan is considered a nationally significant infrastructure project, it is being considered directly by the Planning Inspectorate.

The pre-examination stage began earlier at the Bicester Hotel and is due to last about three months.



OXFORDSHIRE RAILFREIGHT LIMITED

The proposed rail freight hub includes warehousing covering an area of more than 80 football pitches

The proposed hub includes warehousing covering an area of more than 80 football pitches.

"In reality, it's a Trojan horse for an extra large warehouse estate that developers want to build between Hayford Park and Ardley," Norstrand said.

"Even with the developers' most optimistic assumptions there are three times as many warehouses as will be needed."

The initial application was accepted in April, with the scheme also aiming to deliver improvements to nearby roads.



Norstrand (middle) said there had been "absolutely no positive engagement" with the locals

Norstrand, who lives in nearby Hayford Park, said there had been "absolutely no positive engagement" with local people.

He said: "It's something that has come down from the top and where the developers are deliberately using a process that sidelined the local council."

An OxSRFI spokesperson said the scheme was "the result of an iterative process of design, assessment, consultation and re-design".

They said as part of the design process "an extensive environmental assessment process" had been undertaken, alongside consultations with statutory bodies and the public.

The inspectorate's decision is expected to be made in the new year.

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Additional visualisations of the proposed development are required to complete the Environmental Statement

Summary

To the Examining Authority,

As part of the Environmental Statement for the proposed development, the Applicant has provided a series of visualisations of the development (Ref: APP-255)

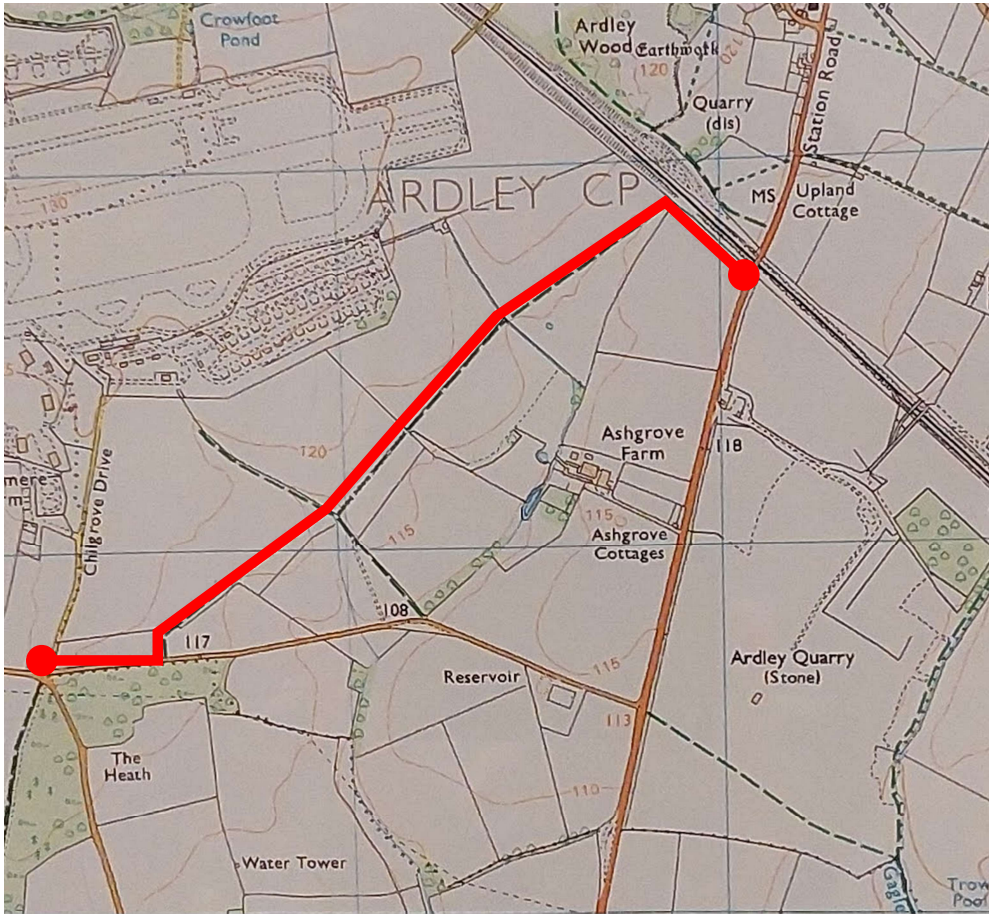
The visualisations illustrate views from a significant distance from the proposed development (1-2 kilometres) and thereby underplay the overwhelming visual impact that will occur closer to the proposed “XXL” warehouses. Some are rendered from elevated “aircraft” viewpoints, thereby minimising the ground-level visual impact.

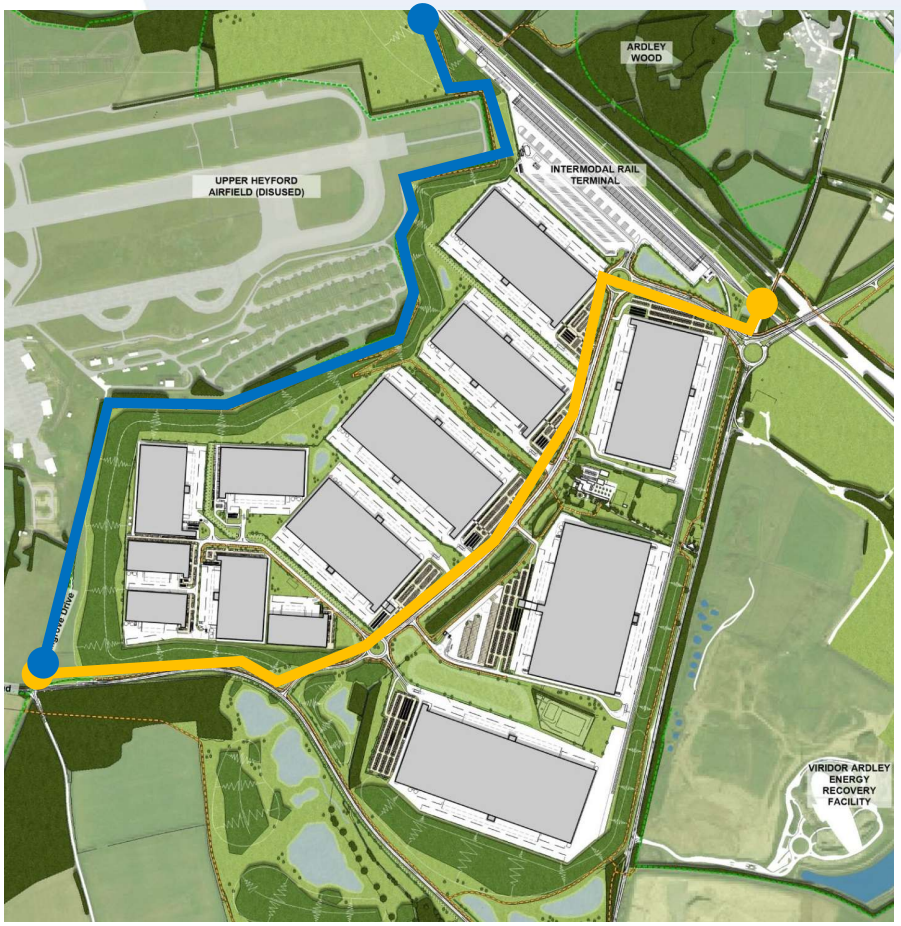
Of significant importance is the proposed project’s impact on users of the Heyford-to-Ardley bridleway, a key local amenity that traverses recreationally attractive agricultural land between Heyford and Ardley.

At Issue Specific Hearing 2 (ISH 2) the Applicant explained that, because the bridleway will be diverted around the outside proposed site bunding, it would not be appropriate to provide visualisations from points along the current alignment of the Heyford-to-Ardley bridleway.

The Applicant’s position is however misleading, as the present path of the bridleway would be most closely emulated by the internal road network within the proposed development. Anyone wishing to walk or cycle between Heyford and Ardley would logically use the direct route through the facility, rather than using the diverted bridleway which along the outside of the proposed SRFI and reaches a different end point. The Applicant has not rendered any visualisations along that internal route linking Heyford and Ardley.

In conclusion, the visualisations that are part of the Environmental Statement do not adequately illustrate the overwhelming visual impact the facility would have on pedestrians, bicycles, or horse riders travelling between Heyford and Ardley. On this basis the Examining Authority should consider the Environmental Statement to be incomplete unless additional renderings showing “close up” visual impact comparisons are provided by the Applicant.





Red:	Current Heyford-Ardley bridleway
Orange:	Heyford-Ardley route best approximating current bridleway
Blue:	Bridleway diversion

The present Heyford-Ardley bridleway has significant visual appeal and recreational value





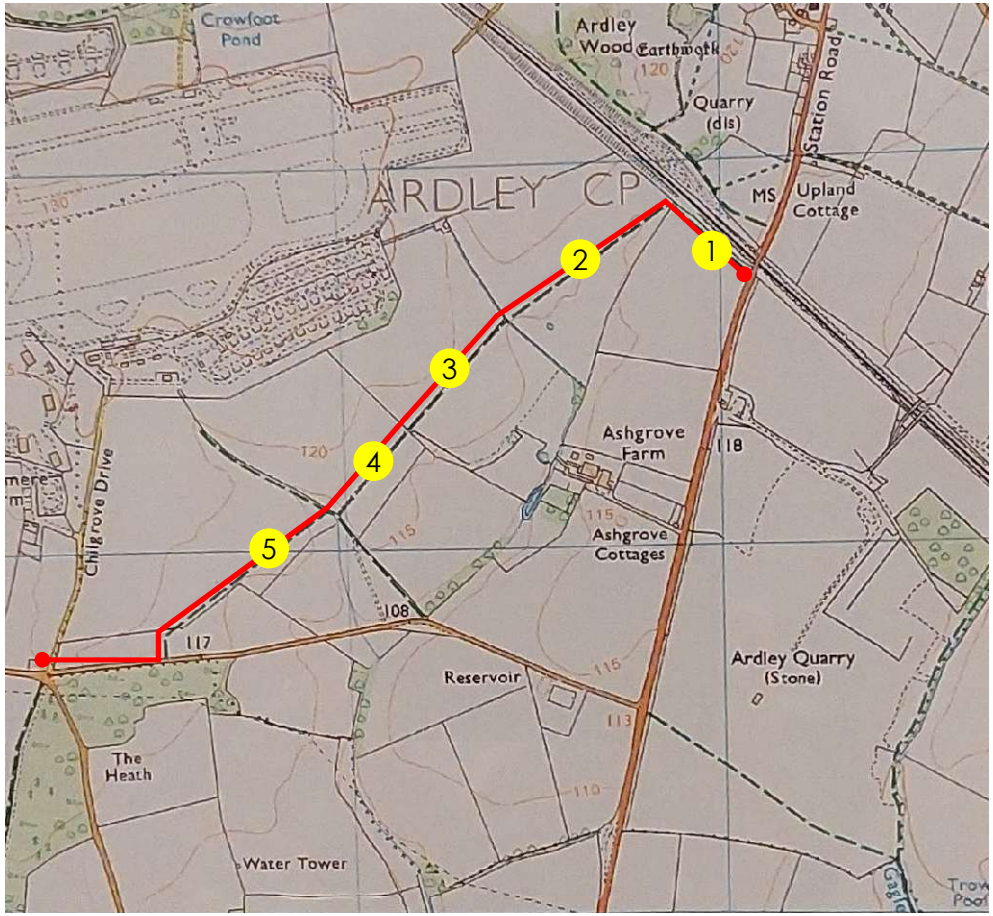




The only available “close-up” visualisation of the proposed XXL warehouse estate has been rendered from an elevated “aircraft” viewpoint that minimises scale and does not show a direct comparison to present conditions



Proposed additional visualisation points (present location and approximate future equivalent)





Appendix: Full-page photos











The site requires a robust mitigation plan for PFAS contamination[i]

To the Examining Authority,

The National Networks National Policy Statement[1] requires environmental risks to be properly understood before consent is granted—not left to be discovered after major earthworks have begun.

Next to the proposed OxSRFI site, investigations at the former RAF Upper Heyford have identified exceptionally high concentrations of PFAS linked to historic use of firefighting foam, with contamination reaching local watercourses[2]. The Applicant has also recently confirmed that PFAS contamination has been found within the proposed site itself.

Where evidence of PFAS contamination exists, an applicant proposing one of Britain's largest logistics developments must be able to demonstrate that the site has been comprehensively investigated. That has not happened. The applicant claims that PFAS levels on the site are "considerably lower than some of the levels known to have been found at other sites nearby"[3], yet it has not published the underlying contamination mapping or explained what those concentrations mean for construction, groundwater or surface-water risks.

A legal opinion recently submitted to Cherwell Council on behalf of the Gallos Brook community group identifies four essential elements of a proper assessment: a PFAS baseline survey, contamination mapping, pathway analysis, and a clear mitigation strategy. It concludes that these matters cannot simply be deferred until *after* planning permission has been granted.[4]

What is particularly striking is that the proposed OxSRFI site's PFAS contamination has come to light only during the DCO process itself, where it has been acknowledged in the Applicant's responses to Relevant Representations. Yet there remains no comprehensive site-wide PFAS contamination map, no evidence that contamination pathways have been fully characterised, and no detailed mitigation plan explaining how contaminated soils or groundwater would be managed during excavation and construction.

The OxSRFI proposal involves extensive earthworks, drainage infrastructure and ground disturbance across a very large site, which is the site of two streams draining from the former RAF Upper Heyford Airbase area. Those ground works could mobilise PFAS contamination into groundwater and surface waters.

The applicant has not provided sufficient baseline evidence for the Examining Authority to conclude that PFAS risks at the site have been appropriately identified, mapped and mitigated before consent is granted. I therefore invite the Examining Authority to conclude that the environmental assessment required for development consent has not been satisfactorily completed.

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[i] *Artificial Intelligence Disclosure: AI tools, mainly ChatGPT, were used in researching the topics discussed in this note and for drafting an initial version of this document.*

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[1] National Networks National Policy Statement, March 2024

[2] https://gallosbrook.wordpress.com/test-results/

[3] *Applicant's Comments on Relevant Representations, Document 9.1*, page 19.

[4] *"The Council's legal duties when determining planning applications on sites where PFAS contamination is known or suspected", Claire Nevin, 28 May 2026 (filed separately)*