OXFORDSHIRE
STRATEGIC RAIL FREIGHT INTERCHANGE

Applicant Response to Oxfordshire County Council and Cherwell District Council Local Impact Report

Document 11.6

On behalf of
Oxfordshire Railfreight Limited

October 2026

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1.0 Introduction

1.1 This response is submitted on behalf of the Applicant in response to the Local Impact Report (LIR) (REP1-029) prepared and submitted by Oxfordshire County Council (OCC) and Cherwell District Council (CDC) (together referred to as 'the Councils') at Deadline 1 of the OxSRFI Examination.

1.2 The LIR is a comprehensive document (at over 200 pages), and is structured around various topics, including but not limited to topics covered by the Applicant's Environmental Statement (ES). Many if not all of the topics addressed in the LIR were also addressed through Relevant Representations submitted by the Councils, and subsequently some also form part of Written Questions (ExQ1) issued by the ExA following the first set of Hearings. In addition, changes or updates being prepared for submission by the Applicant at Deadline 2 include elements of relevance to issues referred to in the LIR, including in the context of the well-established and ongoing dialogue between the Applicant and the Councils.

1.3 Given the above and in light of the content of much of the LIR, and the overlap with either responses already provided by the Applicant or being prepared in light of ExQ1, this response is deliberately proportionate and focused in terms of scope and content. However, the Applicant understands that should there be issues which the ExA considers are not appropriately addressed either here or elsewhere by the Applicant, that the ExA may seek to raise additional questions or seek responses as a matter of course within the ongoing Examination process.

2.0 Overall Response/Summary

2.1 The Applicant notes and welcomes the confirmation in the LIR of positive progress in terms of resolution or clarification of the Councils' position on a wide range of issues. It's clear that as a result of the Councils' continued review of the submitted Application material, informal but regular dialogue with the Applicant, and the Relevant Representations submission and response process, that some earlier concerns or questions from the Councils have either reduced in scope, or been addressed altogether.

2.2 The repeated, clear confirmation that the Councils do not object to the principle of SRFIs is welcomed, as is the agreement by the Councils that the OxSRFI proposals meet the defined requirements for an SRFI contained in the NPS and Section 26 of the Planning Act 2008. However, the Applicant also notes the repeat of concerns and queries about the quantum of development and the scale of the OxSRFI proposals (points raised in Relevant Representations and explored at the first Examination Hearings) - these are set out by the Councils under the heading of 'the principle of development'.

The Applicant has provided responses on these issues in writing and verbally, and as part of post-hearing submissions at Deadline 1 submitted a Note focused on this topic[1] (Document 10.3A/REP1-017) which cross-refers to the various documents considered to set out the rationale and design evolution of the scheme in response to a range of policy, environmental and commercial (or market) considerations. In addition, responses to the numerous ExQ1 questions (submitted at Deadline 2) on these same issues are also intended to be of direct assistance to the ExA and the wider Examination.

2.3 On other strategic matters, it is considered noteworthy that the Councils consider both highways and rail elements of the '*transport and access'* topic to be either positive or neutral. This is testament to the positive and constructive dialogue had by the Applicant and numerous key consultees both in terms of the Transport Working Group (TWG) which oversaw and steered preparation of the Transport Assessment, but also the work more recently regarding the synergies and relationships between OxSRFI and a potential future passenger railway station at or near Ardley. This too formed a focus of discussion at the first Examination Hearings, and in ExQ1s, and as part of post-hearing submissions at Deadline 1 the Applicant submitted a Note summarising the range of benefits of OxSRFI to efforts to improve passenger rail connectivity in the wider area[2] (Document 10.3B/REP1-018).

2.4 That the Councils have some remaining concerns or questions about likely local impacts is noted, and the Applicant will continue to discuss these issues with the Councils with a view to addressing or minimising where practical to do so.

2.5 However, it's clear that in terms of the following issues there are now no or only relatively minor or specific remaining issues or queries and, as indicated below, in many cases the Councils have confirmed their assessment of impacts is positive or neutral:

- *Transport and Access* - the Councils' overall position regarding impacts is either neutral or positive, with an outstanding concern about bespoke car parking standards proposed by the Applicant.
- *Air Quality & Odour* – the Councils' overall position is neutral.
- *Noise & Vibration* – the only remaining issue raised by the LIR is detail surrounding the proposed mitigation (noise insultation scheme), an issue which is subject of ongoing discussions regarding the emerging S106 agreement;
- *Lighting* - the Councils' overall position is neutral.

[1] '*Approach to Design and Quantum of Development*', REP1-017.
[2] '*Passenger Rail OxSRFI Wider Benefi*ts', REP1-018.

- *Water Environment* – the only remaining issue raised is seeking additional detail regarding construction attenuation, and the Councils' overall position is neutral.
- *Heritage* - the Councils' overall position is neutral.
- *Ground Conditions – Contamination and PFAS* - the Councils' overall position is neutral.
- *Socio-Economic (incl Health)* – the Councils overall position regarding impacts is either neutral or positive.
- *Climate Change* – minor queries are raised regarding detailed elements of the energy and carbon reduction strategies, and the Councils' overall position is neutral.
- *Soil Resource & Agricultural Land* –the Councils agree with the Applicant's assessment of likely effects, but have queried the extent of compliance with the NPS[3]. The Applicant has responded to this point in response to the Councils Relevant Representation, and to related issues in response to WQ1s.

2.6 Where the Councils position on these issues include residual queries, suggestions or concerns about potential local impacts the Applicant will continue to discuss these remaining relatively minor points. The expectation is that the outcomes of ongoing dialogue will be incorporated into SoCGs where relevant and/or via further updates to the Examination process.

2.7 In light of the above, this response to the LIR focuses only on those matters which have not yet been agreed or where the Councils LIR raises new issues. Therefore, the body of this response is structured around the following topics (using headings used in the Councils' LIR):

- Ecology including Arboriculture
- Landscape & Visual
- Ground Conditions (specifically focused on Minerals, and potential Paleontology as in the Councils' LIR)
- Materials & Waste
- Parking standards

[3] National Networks National Policy Statement, Department for Transport, 2024.

2.8 As referred to above, much of the LIR repeats or expands upon issues already raised by the Councils, and so this response takes a proportionate approach to each in a manner intended to aid the ExA, and the Councils.

3.0 Applicant response to key issues in LIR

3.1 Ecology including Arboriculture

3.1.1 The Applicant has engaged with OCC and CDC, as well as Natural England (NE) and other interested parties (including the Environment Agency (EA)) on ecological issues over an extensive period, and dialogue and engagement is ongoing including through the Discretionary Advice Service of NE.

3.1.2 To avoid unnecessary repetition, the following section responds to new queries raised by the council. Where appropriate, if additional information is provided at Deadline 2 or, where responses to queries have been provided through responses to Relevant Representations, signposts to the relevant material are provided.

3.1.3 To aid clarity, this response is split into ecological and arboricultural matters.

Ecological Matters - General

3.1.4 The Applicant has submitted updated ecological assessment work as part of the Change request at Deadline 2. This includes a revised ES Chapter 6 and Appendices 6.1, 6.5, 6.8, 6.9, 6.10 and 6.11. It is the Applicant's view that the updated information addresses the main points raised and the significance of the potential effects identified.

3.1.5 The only irreplaceable habitats identified within the Main Site and the overall survey area are the veteran trees (those meeting the criteria as defined in the NPS, see updated Appendix 6.8) and the two areas of ancient woodland Bruntwood Copse and Kennel Copse.

3.1.6 These areas of ancient woodland are retained and buffered by the proposals following the requirements of Natural England's standing advice.

3.1.7 Updated arboricultural information in ES Appendix 6.8 confirms the development requires the removal of one veteran tree (T93), and a further 27 BNG veteran trees have been identified. Justification to support removal under 'wholly exceptional circumstances' is addressed in the updated ES chapter submitted at Deadline 2.

3.1.8 A bespoke compensation package for loss of NPS veteran trees and those veteran trees meeting the classification described in the mandatory

biodiversity net gain regime is provided in the updated HMMP (Appendix 6.11) submitted at Deadline 2.

3.1.9 The Applicant has provided a detailed response to questions regarding ancient woodland and veteran trees (ExQ1.7.4 – 1.7.8) and would refer the Councils to those answers. This includes details of how the loss of veteran trees is justified as 'wholly exceptional circumstances' and details in relation to proposed buffer zones around areas of ancient woodland. In terms of exceptional circumstances the applicant would refer to the overarching case for the proposed development, including the need, economic benefits and planning balance explained and set out in the Planning Statement (Document 5.4/APP-161 supported by the Market Analysis Report (Document 7.1/APP-311), and the GB Railfreight Supporting Statement (Document 7.2B/APP-313). The Applicant would also draw the Council's attention to the post Hearing Note prepared by the Applicant in the 'Approach to Design including Quantum of Development' (Document 10.3A/REP1-017).

3.1.10 With reference to the request for additional otter survey information and information on bird habitats, a standalone mitigation strategy considering impacts to the SSSI, mitigation addressing fragmentation of a functional woodland corridor, the application of bat mitigation measures (lighting / hop overs), and updates to the BNG assessment / HMMP are all provided in the updated ES Chapter 6 and Appendices 6.1, 6.5, 6.8, 6.9, 6.10 and 6.11, submitted at Deadline 2.

3.1.11 In relation to bats, Appendix 1 to this LIR response provides a copy of an email received from Natural England in August 2026 confirming the provision of an over-large culvert to maintain bat flight lines along Gagle Brook under the Middleton Stoney Relief Road as appropriate mitigation at this location. Barbastelle bats use the brook corridor therefore the inclusion of hop-over trees is avoided as these have been implicated in contributing to traffic-related mortality for this species.

3.1.12 It is considered that all of the matters outlined in the LIR 'ecological commentary section' are fully addressed through the updated ES Chapter and Appendices, and Appendix 1 to the Applicants LIR response.

<u>Arboricultural Matters – General</u>

3.1.13 An updated Arboricultural Assessment (ES Appendix 6.8) has been prepared and is submitted at Deadline 2 – this follows dialogue with the Councils, including with regard to issues repeated in the LIR. The Applicant considers that the updated Assessment directly addresses the key points raised in the LIR, including with regard to an updated assessment of likely effects on veteran trees.

3.1.14 The Applicant notes the Councils' comment regarding the expanded test requirements covering 'wholly exceptional circumstances'. As noted above this is addressed in the Applicant's response to ExQ1.

3.1.15 It is accepted by the Councils that there is no guidance or policy which requires the applicants to collect and provide updated tree survey data. The Applicant maintains the position that the tree survey data presented in the Application submission is clear and robust and has informed the Tree and Hedgerow Retention and Removal Plans (Document series 2.15/APP-124 – APP-134) and Schedule 13 Removal of Trees and Hedgerows of the Draft Development Consent Order (Document 3.4/APP-139).

3.1.16 The tree and hedgerow removal identified is based on the current available information and through the detailed design process further evaluation of the relationship and any potential conflicts between the detailed proposals and the existing trees and hedgerows will be undertaken.

3.1.17 The Applicant agrees with the Councils that T93, T150 and T152 would meet the NPS definition of veteran trees. A buffer of 15x stem diameter has now been applied to T93, T150 and T152, which is shown on the Tree Survey Plan within the updated Arboricultural Assessment (ES Chapter 6 Ecology including Arboriculture - Chapter 6.8) to be submitted at Deadline 2.

3.1.18 The Council accepts that the NPS is of most material relevance to the determination of the proposed development and accepts that the NPPF definition of veteran trees sets a higher bar than that of the NPS definition, which is functionally identical to the BNG definition.

3.1.19 The BNG Assessment has been updated at Deadline 2 and will identify and provide further details on the 28 BNG veteran trees, which for the avoidance of doubt includes T93 and those trees that are dead, and will includes details of proposed bespoke compensation for the loss of these veteran trees within a Veteran Tree Strategy (ES6.12) to be submitted at Deadline 2.

3.1.20 A summary of the Applicant's updated position and proposed strategy is set out in response to the ExQ's 1.7.4-1.7.8.

Ecological and Arboricultural – Policy Considerations

3.1.21 The unavoidable loss of NPS and BNG veteran trees is considered in the context of NPS policy, and as part of the wider planning balance. The Applicant considers this loss is acceptable in light of the significance of the Proposed Development when viewed in the context of the 'compelling need' for SRFIs identified by the NPS, and in light of the significant additional tree and other planting proposed as part of the scheme. An assessment of the mitigation hierarchy is provided in the Applicants' response the ExQ1.7.1 (a) and within the updated assessment documents submitted at Deadline 2.

3.1.22 With specific reference to the ecological criterion for designation of the Ardley Cutting SSSI it should be noted that Natural England raise no objection to loss of a small area of the SSSI with the provision of an extensive compensation package and the commitment to an 80-year Habitat Management and Monitoring Strategy. Additional clarification on these measures is provided in the updated HMMP (Appendix 6.11) submitted with Deadline 2.

3.1.23 In specific reference to Policy ESD10, the majority of the points raised have specific responses in the updated information that is submitted at Deadline 2.

3.1.24 In simple terms, it is the Applicant's view that the proposals follow the requirements outlined by the policy through:

- Avoidance of impacts to habitat or site of international value;
- Avoiding and minimising impact to habitats or sites of national value and the provision of a compensation package agreed with Natural England;
- The retention of habitats of higher ecological value or where retention is not possible the provision of adequate mitigation and/or compensation;
- The retention of ecological corridors or where retention is not possible the implementation of mitigation or compensation;
- The use of best practice techniques outlined in the CEMP (Document 6.2C/APP-189) to avoid impact over the construction phase to retained habitats including those in the nationally and locally designated sites.

3.1.25 Policy EDS 11 specifically references 'Conservation Target Areas'. Whilst reference to 'Conservation Target Areas' is provided within the updated Ecological Assessment (Appendix 6.1), these target areas are largely out of date with the majority of the target being adsorbed in the Local Nature Recovery Strategy (LNRS). The measures outlined in the LNRS have been used to inform the habitat proposed for the site green infrastructure package and are detailed in the updated BNG report (Appendix 6.9) submitted at Deadline 2.

3.1.26 The Applicant is aware of the site's position in the Ardley and Upper Heyford Conservation Target Area. Through the provision of 15.44ha of new calcareous grassland, the provision of over 14km of new hedgerows and the overall mitigation / compensation for ground-nesting birds, it is the Applicant's view, that the proposals follow the requirements of Policy EDS 11.

3.1.27 Consideration for habitat retention and the provision of new habitats across the Main Site and the wider site area are set out in the Applicant including the updated ES Chapter and Appendices submitted at Deadline 2. It is the Applicant's view the proposals follow the requirements of Policy ESD 13.

3.2 Landscape & Visual

3.2.1 This section of the LIR expands on points largely made through Relevant Representations, including some that have been addressed through subsequent additional work and some that are the subject of ongoing dialogue between the parties.

3.2.2 It is welcomed that the Councils' confirm (at para 8.5.22) that the LVIA (at ES Chapter 7) provides a substantial evidence base, including its methodology and assessment criteria, landscape and visual effects tables, Zones of Theoretical Visibility (ZTVs) viewpoint mapping, outline planting schedule, illustrative cross-sections, photographs and visualisations.

3.2.3 The Applicant has prepared and undertaken all of this LVIA work in accordance with the relevant and up to date guidance (including GLVIA3 and other Landscape Institute Technical Guidance) and it provides a comprehensive and robust basis upon which the landscape and visual effects of the Proposed Development have been assessed. The Council's nevertheless suggest further detailed work be undertaken and information provided.

3.2.4 The Applicant considers that many of the main matters raised by the Councils are largely picked up by the ExA in the ExQ's section 1.6 (design) and 1.11 (Landscape and visual, including lighting). The Applicant has prepared detailed responses to these questions and would direct the Councils to the responses given. The Applicant's responses to ExQ section 1.13 (Need, location and delivery) are also relevant to some of the matters raised by the Council.

3.2.5 In addition, the Applicant considers responses have already been given to other matters and points through the response to the Councils' Relevant Representations (Document 9.1B/PDA-009), as well as through the discussion held at ISH 1 and 2 where relevant issues were raised. In addition, as a direct response to the discussion held at the initial ISHs, and the scope of relevant Written Questions (EQ1) from the ExA, the Applicant submitted a note regarding '*Approach to Design including Quantum of Development*' (Document 10.3A/REP1-017) at Deadline 1.

3.2.6 Further to the above, the Applicant has undertaken and is continuing to undertake to provide additional work as considered relevant in response to specific questions, suggestions or requests from the Councils. This information includes the following;

- Additional information added to the existing photomontages to depict the maximum buildings heights/ extents (i.e. the maximum buildings 'envelope') for the Development Zones as defined on the Parameters Plan. This information is provided as part of the ES Addendum, at updated ES Figure 7.11 (Rev A). For reference, the maximum building

heights/ extents have been added as an additional image for each of the agreed viewpoints, as noted in the ES Addendum;

- Additional Zones of Theoretical Visibility (ZTVs) plans for component parts of the Proposed Development and overlain with landscape character areas and heritage assets. This information is also included as part of the ES Addendum, at updated Appendix 7.4 (Rev A).

- Additional new photomontage viewpoints, including night-time visualisations. This work is ongoing and will be shared and submitted as soon as possible.

- Additional landscape cross sections through Development Zone C (rail terminal). This work is also ongoing and will be shared and submitted as soon as possible.

3.2.7 In addition to this further information submitted and being progressed, ongoing dialogue over other detailed matters will continue with the Councils to seek to address outstanding concerns, wherever possible. The Applicant maintains that the LVIA provides a comprehensive and rigorous assessment of the likely landscape and visual effects of the Proposed Development. It follows acknowledged guidance; has been undertaken by very experienced landscape professionals. Whilst the Applicant is happy to undertake and provide additional information in response to the Councils' requests and comments, it also considers that some of the detailed information sought is unnecessary in respect of determining, explaining, or illustrating the likely landscape and visual effects that will arise from the Proposed

3.3 Ground Conditions – specifically focused on Minerals, and potential Paleontology

Minerals

3.3.1 This element of the LIR raises issues which were also raised by the Councils (led by OCC) earlier in the process, including at statutory consultation in 2025, and through Relevant Representations. Therefore, it is considered that the Applicant has already assessed and responded to the relevant issues in the ES, and has provided responses to these matters at Procedural Deadline A (in the response to Relevant Representations, Document 9.1B/PDA-009), and in response to ExQ1s at Deadline 2.

3.3.2 The ES (Chapter 11[4], Document 6.11/APP-179) accepts there is a likely sterilisation effect on a mineral resource which lies under the site, and identifies this as a likely adverse effect. The Applicant's assessment recognises the site's location within one of several Mineral Safeguarding areas

[4] NOTE – ES Chapter 11 is updated at Deadline 2 at the same time as submission of this LIR response.

identified in the Minerals & Waste local plan for crushed rock. That local policy (Policy M8) includes a presumption against 'other development' in those areas which would prejudice mineral extraction but also allows for such development where (our emphasis):

> *"**The need for the development outweighs the economic and sustainability considerations** relating to the mineral resource; **or***
>
> *The **mineral will be extracted** prior to the development taking place."*
>
> (OCC Minerals & Waste Local Plan 2017, Policy M8)

3.3.3 Proposed mitigation (centred on re-using any site won materials extracted as part of the construction process) reduces the extent of the sterilisation, and reduces the demand the construction of OxSRFI would make on existing supply of crushed rock. The widespread presence of the same underlying geology across Oxfordshire is also considered to be a relevant mitigating factor (as set out in the ES, including Appendix 11.3 Document 6.11C/APP-288). Indeed, the Minerals & Waste local plan states that: "*crushed rock resources in Oxfordshire – in particular the resources of limestone outside of Areas of Outstanding Natural Beauty – are extensive"* (paragraph 4.44).

3.3.4 Based upon plans within the Oxfordshire Minerals and Waste Local Plan there is circa 170 to 180 km^2 of White Limestone Formation bedrock at/near the surface in Oxfordshire. The OxSRFI site area is approximately 2.2 km^2 so represents circa 1.2% of the overall available mineral[5]. The Minerals & Waste Plan was adopted in 2017 with a plan period ending in 2031, and an emerging plan review underway through which the County Council will plan for the next plan-period.

3.3.5 The Applicant's view on the judgement regarding the balance between the harm caused in terms of conflict with these local policies and the national '*compelling need*' for SRFIs is clear, and unchanged from that set out in the responses to Relevant Representations and in response to ExQ1. The clear 'need' for the SRFI as established through the NPS is considered directly material to the assessment of the degree of compliance, and any harm, with these local policies. In addition to narrative and assessment in the ES, the Planning Statement (Document 5.4/APP-161) considers the various benefits and residual harm or adverse effects as part of the 'planning balance'.

3.3.6 The Applicant is in ongoing discussions with OCC (and CDC) about the content of a statement of common ground on minerals issues.

[5] ES Appendix 11C/APP-288) provides a detailed Minerals Assessment, including consideration of technical and policy issues.

Paleontology

3.3.7 The issue of potential Paleontological features within the site has also been a long-running element of the Councils contribution to the application preparation process. This has been discussed during the regular (and ongoing) meetings between the parties, and also the Applicant responded to the Councils' Relevant Representation on this issue (Document 9.1B/PDA-009).

3.3.8 The Councils position is underpinned by an assumption that the likelihood of discovering paleontological features (i.e. fossils) is high within the OxSRFI site. That assessment, including that in the initial note provided at Annex 2 of the LIR, is centred on the proximity of the Ardley Trackways SSSI and a common underlying geology between that SSSI and the OxSRFI Main Site. It is understood that the footprints on the SSSI site were found in the lower sections of the White Limestone Formation geological bedrock, probably within The Shipton Member and the Annex 2 note also acknowledges that any potential is focused on certain geological layers.

3.3.9 However, as set out in the submitted ES (Chapter 11[6], Document 6.11/APP-179 and ES Appendix 11.9 Document 6.11I/AS-080) the earthworks operation is predominantly limited to the upper 3m of the limestone which has a high degree of weathering and where dinosaur fossils are not considered likely as a result. In addition, the extent of earthworks and construction works which will come into contact with relevant deeper geological layers is limited to relatively small areas of the site. Only works in the rail freight terminal area (Zones B and C) and the western part of Zone A4 will see deeper excavations where there is a possibility (albeit still considered very low) of encountering geology which might feasibly contain dinosaur footprints/fossils. The plan included in ES Appendix 11.9 (Document 6.11I/APP-294) identifies those limited areas.

3.3.10 The Applicant has sought to engage positively but in a proportionate way to this potential for encountering paleontological features of interest during deeper earthwork excavations. Having regard to these factors and in response to the points made by the Councils the Applicant has proposed a watching brief by a paleontologist (secured by Requirement 13(3)) for relevant parts of the earthworks. Further information about that proposed approach is set out in ES Appendix 11.9 (Document 6.6I/AS-080).

3.3.11 The Applicant notes Annex 2 of the LIR including the focus on works at appropriate geological layers and depths which, as set out above, are likely to be very limited. In addition, the types of potential mitigation measures identified in Annex 2 should any features be uncovered reflect those already

[6] NOTE – ES Chapter 11 is updated at Deadline 2 at the same time as submission of this LIR response.

identified in the Applicant's Technical Note (ES Appendix 11.9, Document 6.11I/AS-080). These include controlled excavation and detailed examination and possibly removal of any fossils, with detailed documentation incorporating photography and 3D archives of important data. This alignment between the mitigation measures recommended in Annex 2 and the Applicant's Technical Note is noted.

3.3.12 The main advantage of preparing a WSI now is understood to be reducing timing and delay should features be found under the watching brief. The risk of such a delay rests with the Applicant, who remains content that the proposed approach – secured by Requirement 13, and informed by consideration of the contextual evidence – is proportionate and appropriate.

3.4 Materials & Waste

3.4.1 This section largely repeats or expands upon matters raised by the Councils through their Relevant Representations. The Applicant has responded to many of these points in its response to the Councils' Relevant Representations and has responded to similar matters raised in the ExQ's Section 15.

Loss of IVC

3.4.2 The Applicant does not agree with the Councils' position on the likely effects of the Proposed Development on waste treatment capacity and considers that the assessment presented in the ES is robust and appropriate. Nevertheless, the Applicant acknowledges the additional data submitted by OCC and will review it and provide its response in due course as part of the on-going discussions with the Council.

Waste Arisings

3.4.3 Given the stage of the application process, it is not considered reasonable or appropriate for the Applicant to provide further detail on the specific types of waste anticipated. The Councils are therefore directed to the Applicant's original response on this matter in its response to the Relevant Representations.

3.4.4 The Applicant has committed to diverting 90% of waste from landfill and whilst it notes that the Councils are seeking a target of 95%, the Applicant considers that 90% reflects good industry practice and that the mitigation measures in place will ensure this level can be achieved and should also enable diversion to exceed OCC's 95% target, as detailed in ES Chapter 13 Materials and Waste (Document 6.13/APP-181)

3.4.5 The Applicant has already assessed the impact on the landfill capacity and refers the Councils to its response to the Relevant Representations.

Demolition Waste

3.4.6 Total demolition waste is expected to be 27,517 tonnes together with a very minor amount of additional demolition and green waste (Document 6.13/APP-181). This represents approximately 0.5% of the regional landfill capacity and 4.7% of the regional non-landfill waste capacity (e.g. recycling) (Document 6.13/APP-181).

Earthworks

3.4.7 The cut and fill balance assumes that no material is sent off-site or imported to site. 27,700m³ is the current modelled surplus that will be managed on-site to achieve the cut and fill balance within the defined parameters as detailed in ES Chapter 13 Materials and Waste (Document 6.13/APP-181). This figure is well within the tolerance for typical earthworks operations of this magnitude.

Ardley Landfill

3.4.8 The works at Ardley Landfill will be carried out under the Environmental Permitting Regulations. The works associated with the landfill are covered in ES Appendix 13.1 (Document 6.13A/APP-299), and no waste is expected to be exported from the site.

3.4.9 The detailed design of the Ardley Landfill re-engineering and material relocation works will be developed as part of the wider detailed design process post consent. The re-engineering and relocation of landfill materials will be carried out in accordance with a Construction Quality Assurance (CQA) Plan (as required by the CEMP paragraph 12.1 (Document 6.2C updated Rev A will be submitted at Deadline 2)) approved by the Environment Agency (EA) before works commence. The management and reuse of these materials will require specific EA approval “in compliance with the existing site permit”. However, the works cannot be undertaken under the existing permit in its current form, and the EA has advised that it is likely to require a variation to the existing Ardley Landfill environmental permit.

3.4.10 The Applicant has worked closely with the EA through the enhanced pre-application service to agree this approach, which is considered to be the most appropriate approach to the works in the landfill area.

Construction Waste

3.4.11 The construction phase is anticipated to take place over a 7 year period. When considered over this period, the amount of construction waste generated is considered to be negligible as detailed in the CEMP (Document 6.2C updated Rev A will be submitted at Deadline 2).

Expansive Materials and Waste Study Area / Regional Baseline

3.4.12 The Applicant's assessment uses Oxfordshire, Buckinghamshire and West Northamptonshire as the regional study area. The Applicant considers it unrealistic to include the whole of the Southeast, as non-hazardous waste from the Proposed Development would not be transported to the far parts of that region, such as Kent. Widening the study area to the whole of the Southeast would require the assessment to be redone and, by increasing the baseline capacity, would reduce the magnitude of the assessed impact.

Existing Facilities for the Deposition of Waste

3.4.13 The Applicant's position is that a 30km radius is more realistic than a regional boundary. Transporting waste is expensive, and the merchant waste market is highly unlikely to adhere to an arbitrary regional boundary; waste will instead be sent to the closest and most cost-effective facility (Document 6.13/APP-181).

3.4.14 As the existing facilities have sufficient capacity to accommodate requirements until 2030, the sensitivity of the receptor is considered low.

Cumulative Impacts

3.4.15 The information surrounding the construction programme and waste arising from the White Horse Reservoir Project was not available at the time that the OxSRFI assessment was undertaken. The project remains at pre-application stage and is therefore not yet finalised and is not a committed project. Furthermore, the White Horse Reservoir Project is also likely to seek to achieve a cut fill balance and will have a long construction programme, which will limit the impact on the local waste market. It should also be noted that waste capacity is elastic, and new facilities may come online or existing facilities can vary their permits.

3.5 Car parking

3.5.1 OxSRFI requires a level of car parking provision above OCC's standard for conventional distribution developments. As a Nationally Significant Infrastructure Project, OxSRFI must satisfy the NPS, which recognises that SRFI need direct access to major road and rail networks, and as such may require countryside locations, and typically operate continuously. OxSRFI is accordingly proposed near M40 Junction 10 and the Chiltern Main Line railway, with 24-hour operations supported by shift working.

3.5.2 The Applicant has agreed a package of sustainable transport measures with OCC to promote public transport, walking, cycling and car sharing. These measures are forecast to reduce the proportion of employees driving by car from 92% baseline to 68%, resulting in a 26% reduction in peak parking demand. OCC recognise at paragraph 8.1.29 of their LIR that the agreed modal share targets are "…ambitious but realistic and achievable in the

context of the sustainable travel mitigation that would be provided by the development."

3.5.3 Large scale logistics sites experience their highest parking demand during daytime shift changes, when arriving shift workers overlap with departing shift workers and office-based employees. OCC's maximum standards of one car parking space per 300 square metres would provide a maximum of 2,348 spaces, including an adjusted allowance for mezzanine floors. The Applicant has compared this level of parking provision to forecast car parking accumulation using the agreed employee trip-generation figures and the agreed modal share targets. That work is presented at the OxSRFI Car Parking technical note (report reference ADC1794-RP-AA1-V4) at Appendix 2 to this LIR response. It considers two night-working scenarios: one-third of warehousing staff working nights and a lower assumption of one-quarter.

3.5.4 The car parking accumulation demonstrates that adherence to OCC's standard maximum car parking allowance for a development of this nature and location would mean a potential car parking space shortfall of 37% in the Opening Year and up to a 24% shortfall in the Completion Year. Such under-provision could lead to overspill parking on estate roads and within nearby settlements, with consequential effects on local communities and the safe and efficient operation of the Proposed Development.

3.5.5 The Applicant therefore proposes an alternative maximum car parking ratio of one parking space per 200 square metres of standard floorspace and one space per 400 square metres of mezzanine floorspace. This remains a car parking restriction as compared to other SRFI sites such as Northampton Gateway SRFI, which has a minimum car parking ratio of one parking space per 120 sqm of standard floor space.

3.5.6 The Applicant's proposed alternative maximum car parking provision represents an appropriate and proportionate balance. It is sufficient to accommodate forecast residual peak parking demand based on the agreed Travel Plan mode share targets and prevent harmful car parking overspill, while remaining constrained enough to support the Travel Plan's objectives of reducing car use and increasing travel by sustainable modes.