OXFORDSHIRE
STRATEGIC RAIL FREIGHT INTERCHANGE

DCO Submission

Planning Statement

Appendix 2: NPS Policy Compliance Tracker

Document 5.4B
Revision A

On behalf of
Oxfordshire Railfreight Limited

Prepared by Oxalis Planning
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Appendix 2 (Revision A) OxSRFI Planning Statement, October 2026

NPS Policy Compliance Tracker

Introduction

1.1 This Policy Compliance Tracker analyses the compliance of the Proposed Development with relevant national and development plan policy, and should be read alongside the main Planning Statement.

1.2 The Proposed Development is described in detail in the main body of the Planning Statement (Section 3), including the various component parts and application procedure, and that detail is not repeated here.

1.3 The National Networks National Policy Statement ('the NNNPS', or 'the NPS') is the "*primary basis for making decisions on development consent applications on the national road and rail networks in England*" (NPS, paragraph 1.3). Therefore, this is the key source of policy for Proposed Development including the main highway works which form part of the application and are a Nationally Significant Infrastructure Project in their own right.

1.4 This Tracker is intended to help inform interested parties, and the Secretary of State, regarding compliance with the relevant national policy statement and any 'important and relevant matters' to be taken into account.

1.5 The Table below sets out key elements of NPS policy, and a summary of how the Proposed Development is considered to accord with it, with relevant references to specific elements or design features of the proposals, and/or key documents which provide more detail where relevant.

1.6 In summary, as demonstrated by the following schedule, the Applicant considers that the OxSRFI proposals fully accord with the relevant elements of the NPS.

Table - OxSRFI NPS Policy Compliance

Paragraph reference	Policy Content in NPS (2024)	OxSRFI Compliance with Policy
3. The need for development of the national networks		
3.8	"*Transport infrastructure is a catalyst and key driver of growth, and it is important that the planning and development of infrastructure fully considers the role it can play in delivering sustainable growth, how it can support local and regional development plans and the growth aspirations of local authority areas. This will include exploring options to unlock sites for housing and employment growth made accessible by sustainable transport and the regenerative impact major infrastructure can play in driving renewal, increasing density, as well as creating new places and communities*."	The Proposed Development would represent a major investment not only in the 'national networks' through both road and rail transport infrastructure, but also represents a major investment in local economic development and place-shaping. The socio-economic benefits of the proposals are set out in **ES Chapter 12 (Document 6.12)**, including the direct and indirect employment benefits and other associated economic impacts. The road transport improvements including enhanced capacity and journey time reliability which would be delivered by the OxSRFI scheme have been assessed having considered cumulative traffic from planned and committed developments locally, including sites allocated in the Local Plan, and will deliver benefits for road-users across the wider area. The proposals will also deliver improved 'active travel' infrastructure with new opportunities to travel by sustainable modes both for commuting or for leisure. Details of the proposed highways works, and their likely impacts on the SRN, re set out in the **Transport Chapter (Chapter 3, Document 6.3)** of the Environmental Statement and supporting technical appendices including the Transport Assessment (TA, at **ES Appendix 3.1**, Document 6.3A).

3.17	"*Any national network Nationally Significant Infrastructure Project (NSIP) should seek to improve and enhance the environment irrespective of the reasons for developing the scheme. However, there may be instances where infrastructure interventions are required to bring about improvements to environmental outcomes. Such outcomes might include contributing to net zero targets through, for example, electric vehicle charging, electrification of rail, improvements to air quality through reductions in congestion, or delivering localised environmental improvements to cultural heritage, landscape, or biodiversity*."	A range of environmental outcomes will be delivered by the OxSRFI scheme, as identified across various ES chapters. These include examples given in the NPS, such as: investment to enable increased adoption of EV use (through EV charging infrastructure); localised air quality improvements as a result of removing traffic from village centres; and delivery of in excess of 10% biodiversity net gain as part of significant provision of new or enhanced Green Infrastructure included within the Proposed Development. **ES Chapter 17** (**Document 6.17**) provides an overview of the overall range of likely effects of the Proposed Development, and the Planning Statement provides the Applicant's assessment of the overall 'planning balance' which includes reference to the range of improvements and benefits likely to be delivered by the Proposed Development.
Government's policy for addressing need of the national road network		
3.31	*"This NPS does not identify a level of capacity to be provided and does not anticipate that new capacity will match forecasted demand growth under any of the scenarios modelled in the National Road Traffic Projections and instead is focused on addressing the worst constraints on the network. Infrastructure interventions can include measures such as addressing pinch points and improving flow aimed at addressing localised issues to help address reliability, predictability, and capacity issues at specific locations, which can in turn improve overall performance of the wider network of local roads and the SRN in that location. Equally*	The OxSRFI scheme will deliver investment in the SRN which mitigates for the effects of the additional traffic it may generate while also targeting long-standing and well-understood constraints around Junction 10 of the M40 motorway, as well as improvements to Junction 9. As part of the proposed package of highways works, the **Transport Assessment (ES Appendix 3.1, Document 6.3A) confirms** this will deliver not only additional capacity, but also benefits in terms of improved reliability and predictability (with reduced journey times through the Junction 10 complex to and from the A43 and M40).

	interventions could include measures to improve active travel infrastructure, delivering better integration with the wider transport network, and improving roadside facilities."	The Proposed Development will also deliver new active travel infrastructure integrated with the package of highway infrastructure and improvements, including walking and cycling routes as part of diverted or new PROW links, and other routes, providing opportunities for both commuting and leisure trips.
3.46	"*The government's wider policy is to bring forward improvements and enhancements to the existing SRN where necessary to address the needs set out earlier. Enhancements to the existing national road network will include but are not limited to:* • *new and improved junctions and slip roads* • *improvements to trunk roads, in particular, dualling of single carriageway strategic trunk roads and additional lanes on existing dual carriageways* • *measures to enhance capacity of the motorway network."*	Details of the proposed highways works, and their likely impacts on the SRN, are set out in the Transport Chapter (Chapter 3) of the Environmental Statement (Document series 6) and supporting technical appendices including the **Transport Assessment (TA, at ES Appendix 3.1)**. The proposed works include new and improved slip roads to and from the M40 motorway, with improvements at both junctions 9 and 10. Improvements would also be made to junctions on the A43 trunk road in the vicinity of Junction 10. OxSRFI highways works represent an NSIP in their own right, and will deliver improvements to road-users beyond those visiting or working at the OxSRFI site.
The drivers of need for development of the national rail network		
3.55 – 3.56	*"3.55 Additionally, prior to COVID-19, Network Rail has published future freight demand forecasts, estimated using a range of different scenarios. Even when accounting for a wide range of market scenarios, industry-endorsed forecasts indicate strong long-term rail freight growth on key freight corridors between now and the 2040s. This overall growth reflects forecast growth and an improvement in the competitiveness of the rail industry.*	The OxSRFI proposals reflect clear evidence of market activity and demand with regard to the distribution and logistics sector in this area, and would enable development and investment by operators/occupiers in this sector to incorporate rail into their supply chains and operations. OxRFI will directly contribute to the decarbonisation agenda by enabling a shift from road to rail. The Applicant has worked closely with Network Rail since 2019 to establish the technical feasibility of delivering a new

	3.56 Government strongly supports growth in these sectors as they are predicted to have the greatest ability to transfer goods from road to rail, supporting the wider modal shift agenda and decarbonising our transport network. With the correct infrastructure in place, modal shift can be facilitated at pace, unlocking the benefits of rail freight. *3.57 There will therefore be a need to reallocate network capacity and capability, as well as to expand that capacity, to meet this demand for rail freight, particularly given the need to accommodate this growth alongside changing passenger demand."*	SRFI in this location, and has confirmed there is the required capacity to integrate freight paths within the current passenger rail timetable, but – as reflected in the NPS - with an understanding that timetables are often adjusted or modified over time.
3.70	*"Any scheme needs to comply with the legislative requirements and address the policy context appropriately. Infrastructure improvements may help to facilitate environmental improvements such as a reduction in emissions (for example carbon or noise). Chapter 2 has already set out the contribution that rail can play in decarbonising transport and the need to decarbonise rail further. At present, 38% of the rail network is electrified[81]".*	The ES includes assessments which help identify a range of environmental improvements as a direct consequence of the proposals – these include noise and air quality improvements due to reductions in through traffic, including HGVs in village centres at Ardley and Middleton Stoney, but with wider benefits in other locations as traffic reassigns to improved parts of the SRN and away from less appropriate local routes. Through the inclusion of a SRFI, the OxSRFI proposals will directly contribute to the decarbonisation of the transport sector with in excess of 53 million miles removed from the road network per annum.
Drivers of need for strategic rail freight interchanges		
3.87 – 3.89	*"A network of SRFIs is a key element in aiding the transfer of freight from road to rail, supporting sustainable distribution and rail freight growth and*	The OxSRFI is proposed on the M40 corridor which is currently under-served by SRFIs, and so will directly provide new opportunities for the shift of freight from road to rail.

	meeting the changing needs of the logistics industry, especially the ports and retail sector. SRFIs also play an important role in reducing trip mileage of freight movements *on road networks, especially when supported by intermodal Rail Freight Interchanges, which, when located in areas currently unaddressed by rail, will serve to boost traffic from SRFIs and inbound volumes.* *3.88 Rail Freight Interchanges enable freight to be transferred between transport modes through consolidation centres, thus allowing rail to be used most effectively to undertake the long-haul primary trunk journey, with other modes (usually road) providing the secondary (final delivery) leg of the journey. Rail Freight Interchanges can relate to any commodity sector, including rail-served Intermodal rail freight interchanges are regional railheads whose principal flow of traffic is containerised general merchandise traffic, as opposed to bulk materials such as aggregates, biomass or waste.* *3.89 In order to meet the needs of these users, there may be a greater demand for both an updated network of Rail Freight Interchanges and SRFIs in new locations to support this aim."*	The Applicant is working with GB Railfreight who intend to operate the terminal if approved, and who have provided a Statement as part of the application which helps underpin their view of the opportunities to meet and encourage wider market use rail in this part of the south-east. The location of the OxSRFI would enable access to a number of ports, thereby removing the need for a road based long-haul journey, as envisaged by the NPS. The proposals therefore directly respond to the NPS policy of seeking development 'across regional and in 'all regions'. It will directly respond to the NPS policy to see an 'expanded network' of SRFIs.
Government's policy for addressing need for SRFIs		
3.99 - 3.101	*"The Government has set a target of at least 75% growth in rail freight by 2050 and is committed to meeting this figure. To be able to successfully achieve that growth target, the right infrastructure needs to be in place, providing the necessary capacity and*	The OxSRFI site is well located and has the required connectivity to strategic road and rail networks – specifically the M40 motorway, plus access to the A43 corridor (and nearby A34), and the Chiltern Main Line (part of the strategic freight network). The key criteria of the NPS with regard to

	capability to support growth. SRFIs are crucial to rail freight growth. *3.100 To facilitate this modal shift, a network of SRFIs is needed across a broad range of regions, to serve regional, sub-regional and cross-regional markets. In all cases, it is essential that these have good connectivity with both the road and rail networks, in particular the strategic rail freight network. The enhanced connectivity provided by a network of SRFIs should, in turn, provide improved* *trading links with our international trading partners and improved international connectivity and enhanced port growth."* *3.101 Following the designation of the National Networks NPS in 2015, there have been several applications which have received development consent and are operational. This has gone some way towards facilitating an expanding network; however, to meet government's ambitions for rail freight growth there remains a need for appropriately located SRFI across all regions where there is demand or potential demand, to enable further unlocking of benefits."*	connectivity and access to national road and rail infrastructure are therefore fully addressed. The location would directly support the objective of expanding the network of SRFIs by delivering a new SRFI on the M40 corridor between Birmingham and London, a strategic arterial route. The proposed site is located in the south-east region, and is well placed to serve parts of London, where the NPS identifies the challenges in expanding existing (often smaller-scale) rail interchanges. The **Market Analysis Report (Document 7.1)** provides evidence of the market context for the proposals, including the strength of market need and demand in this area. The same Report confirms that the M40 corridor is currently under-served by SRFIs, and there is a shortage of strategic distribution sites, despite the M40 being a key arterial logistics route. OxSRFI will add additional capacity to the rail freight interchange network, and in expanding the network, will enable the benefits referred to in the NPS to be realised into new parts of the UK. These arguments are set expanded, with reference to the **Market Analysis Report**, in the main body of the **Planning Statement**.
3.105 – 3.106:	*"This means that SRFI capacity needs to be provided at a wide range of locations, both in regions where they are currently located and, more broadly, to provide the flexibility needed to match the changing demands of the market, possibly with traffic moving from existing Rail Freight Interchange to new larger facilities. There is a*	

	particular challenge in expanding rail freight interchanges serving London and the South East. *3.106 Consideration should be given to ensuring existing SRFI locations are taken into account when making an application, to ensure that SRFIs are strategically located and thus enable a more extensive cross-country network which unlocks the full range of benefits that an expanded network of SRFIs can provide. Whilst there is likely to be a natural clustering of SRFI proposals in the distribution heartland of the nation (and further SRFI proposals in this area will continue to be important), consideration should be given to proposals for SRFIs in areas where there is currently lesser provision."*	
4. General principles and considerations		
4.9	One of the 'general principles of assessment' set by the NPS relates to use of a **local transport model**. It states: *"Applications for road and rail projects should be supported by a local transport model to provide sufficiently accurate detail of the impacts of the project. The modelling will usually include national level factors around the key drivers of transport demand such as economic growth, demographic change, travel costs and labour market participation, as well as local factors. The Examining Authority and the Secretary of State do not need to be concerned with the national methodology and national assumptions around the key drivers of transport demand. An assessment of the benefits and*	The submitted **Transport Assessment (TA) (ES Appendix 3.1, Document 6.3)** is directly informed by use of the relevant local transport model – in this case, the Bicester Transport Model (BTM) – based on the advice and preferences of National Highways (NH) and the local highways authority (OCC). The scope and methodology of the modelling undertaken was discussed and agreed through the Transport Working Group (TWG) established by the Applicant and which includes NH and OCC. Areas of uncertainty have been directly incorporated into the process, with additional modelling and 'sensitivity' testing undertaken with regard to emerging but not committed

	costs of schemes under a range of scenarios should reflect future uncertainty, in addition to the core case. The modelling should be proportionate to the scale of the scheme and include appropriate sensitivity analysis to consider the effects of uncertainty on project impacts."	development proposals in the vicinity of the Proposed Development (by Albion Land and Tritax Bigbox). Although not straight-forward given the ongoing nature of the TA's associated with them, the TA and ES also provides consideration of other large-scale development proposals not yet determined – Heyford Park 'new town' and Puy du Fou leisure proposals - to aid an understanding of additional likely cumulative transport effects should they be consented and delivered in due course. The approach taken is considered to fully satisfy the NPS requirement for modelling to be "*proportionate to the scale of the scheme*" and incorporate sensitivity analysis to consider areas of uncertainty.
4.12 – 4.13	Notwithstanding the indication in the NPS that the 'Strategic Environmental Assessment' process and regime is to be replaced ultimately, the NPS confirms the importance of **Environmental Assessment** to the NSIP process. It includes that "*a key part of environmental assessment is the consideration of cumulative effects*", with reference to other appropriate and relevant "*existing and committed developments*". The NPS also states: *"There is no single or agreed approach to assessing the cumulative impacts of environmental effects due to some effects being limited to a specific geographical boundary but others, such as the impact and effect of carbon emissions on climate change, not being geographically limited. For this reason, it may be*	The submitted application includes a comprehensive **Environmental Statement (ES, Document series 6)** which presents the findings of the EIA process. The scope of the ES was informed by the Scoping Opinion issued by PINS in 2021 which was itself informed by the preferences and requirements of other statutory and local consultee bodies. The various topic specific chapters of the ES confirm the ways in which a worst-case assessment has been considered, including where the scheme parameters represent a worst-case scenario (for example assuming maximum building heights in every part of every zone of the Main Site, and by excluding the likely effects of the Travel Plan in reducing car traffic from the assessment of likely traffic impacts in the TA).

	necessary for different approaches to be taken to assess the cumulative impact of different environmental effects." At paragraph 4.13 the NPS recognises that not all details will necessarily be settled or fixed at the time of application, and where this is the case it should be set out, and "*a worst-case scenario*" assessed.	
4.14 – 4.19	The NPS confirms that the **Habitats Regulations Assessment (HRA)** apply where it is possible that a project could likely have a significant effect (alone or in combination with others) on a protected site in the UK National Site Network (including SACs and SPAs, and other 'habitat sites'). The NPS confirms that the Secretary of State is the 'competent authority' in decision-making on NSIPs. At paragraph 4.16 the NPS suggests "*early advice*" be sought from the appropriate statutory consultees, and at paragraph 4.17 that the application must provide sufficient information to allow an "*appropriate assessment of the likely effects in view of the site's conservation objectives*".	The Applicant has considered the requirement to undertake a HRA – a **Shadow HRA** forms part of the submitted application (**ES Appendix 6.10, Document 6.6J**). In addition to, and since, the ES Scoping process in 2021, the Applicant has engaged with Natural England and other statutory consultees throughout the preparation of the DCO application.
4.20 – 4.22	The NPS identifies the requirement to comply with all legal requirements regarding assessment of **Alternatives,** noting these may come from various regulations or policy, including the HRA (above) and EIA regulations (also referred to above).	The **Environmental Statement Chapter 2 (Document 6.2)**, expanded by ES Appendix 2.4 '*Alternative Site Assessment*', includes detail of the main potential alternative sites considered by the Applicant. The Report at Appendix 2.4 includes details of the process undertaken and gives an explanation of the main reasons why alternative sites are not considered to be available or suitable alternatives.

	Where consideration of alternatives is required, the NPS (at paragraph 4.22) advocates for a "*proportionate*" approach.	The **Design Approach Documents (DAD's, document series 5.5)** set out the approach to the 'design' and layout of the site including the design alternatives considered as part of the evolution of the project having regard to the environmental effects.
4.23 - 4.26	The NPS confirms that there is provision in the Environment Act 2021 for **Biodiversity Net Gain (BNG)** to become mandatory for NSIP projects (at paragraph 4.26), and includes delivery of BNG as part of the '*places'* design principle. The NPS encourages use of the latest BNG metric (at paragraph 4.24) to assess the baseline and inform the assessment of BNG outcomes as part of applications. The NPS allows delivery of BNG on- or off-site, and encourages reference to local nature recovery strategies and other plans and strategies to inform net gain delivery (paragraph 4.25).	Although not mandatory for the OxSRFI project, the submitted application does seek to deliver (exceed) a 10% BNG. This has been calculated using the latest DEFRA metric. Details are set out in **ES Chapter 6 Ecology & Arboriculture, Document 6.6)** including technical appendices such as **Appendix 6.9 BNG Assessment and Appendix 6.11 HMMP).** The proposals include BNG on-site, integrated as part of the comprehensive green infrastructure across the Application Site, and coordinated with wider ecological mitigation and compensation required.
4.27 - 4.32	The NPS presents '**design'** as "*an integral consideration from the outset*", and as not just limited to 'aesthetic considerations'. The NPS identifies four **Design Principles** (at paragraph 4.27) under the following headings: • *Climate* – focused on mitigating emissions, resilience, and adaptation to climate change; • *People* – with an emphasis on accessibility, safety, and health or wellbeing;	The submitted **Design Approach Documents (DAD's, Document series 5.5)** set out the Applicant's approach to design issues, and the principles and considerations which have informed the design of the scheme. The overarching vision for the OxSRFI is to establish a successful Strategic Rail Freight Interchange, meeting the demands of the market and facilitating investment, job creation and economic growth alongside greater use of rail in the supply chain. The commercial components of the scheme will be positioned within an extensively landscaped site, with

	• *Places* – focused on 'identity' and sense of place, connecting communities and integration with surroundings, including ecological gains and with regard to landscape beyond the site. • *Value* – with an emphasis on delivering wider benefits, plus efficiency in use of natural resources and materials, and energy. Good **design** is considered by the NPS as forming part of the overall mitigation process, seeking to avoid or compensate for identified potential problems, and avoiding or mitigating impacts while "*contributing to the conservation and enhancement of the natural, built and historic environment*" (paragraph 4.28). Design is defined as a 'material consideration' in decision-making (paragraph 4.29), with assessment of design including sustainability, industry specific design guidance, and functionality, as well as aesthetics and the "*contribution to the quality of the area in which it would be located*". For road schemes, the NPS refers to the Design Manual for Roads and Bridges (DMRB) which contains design standards (paragraph 4.30). The NPS expects applications to demonstrate how the design process was conducted, how engagement was undertaken, and how the design evolved, with regard to the "*ultimate purpose of the infrastructure and the operational, safety and security requirements which the design must satisfy*" (paragraph 4.31).	their effects on the environment and local communities minimised and appropriately mitigated. The scheme will deliver access to significant green infrastructure and notable improvements in biodiversity. The quality of the landscaping, building and infrastructure design will create a sense of place appropriate for its setting and a commercial scheme of national significance. The approach to the design of the Proposed Development is entirely consistent with the NPS and other relevant design guidance. It is responsive to local landform and topography and sensitive to existing local features both within the Main site and adjacent to the Proposed Development. The Main site has been selected in part because of the containment provided by its beneficial landform, and its evolving context, which enables large scale buildings and infrastructure to be developed in a form which enables the effects to be managed and mitigated appropriately. The residual design outcomes are therefore environmentally sensitive with regard to visual and landscape impacts and will deliver high quality and much needed national infrastructure within a well-designed and distinctive place. The **Highways DAD (Document 5.5C)** provides details of the approach to, and evolution of, the design of the highways elements of the scheme, with reference to the DMRB. The **TA (ES Appendix 3.1)** and associated appendices also include relevant references to the DMRB in helping shape and inform the design, as does the specific **Highways DAD (Document 5.5C).**

	The NPS advocates for a 'design champion' within the project team, and encourages Applicants to consider independent advice, such as use of 'design panels' (paragraph 4.32).	
4.33 - 4.44	***Climate change adaptation*** is given particular emphasis as one of the general considerations for NSIPs on the national network, and mitigation is described as "*essential*" as part of the efforts to minimise the most dangerous effects of climate change (paragraph 4.34). The NPS (paragraph 4.38) requires Applicants to consider nature based 'adaptation' solutions in tandem with biodiversity benefits, and tied to 'green infrastructure' (which features in Section 5 below). The direct and indirect impacts of climate change should be considered by Applicants when planning national infrastructure schemes (paragraph 4.39), including with reference to flood-risk, and having regard to the latest UK Climate Projections to inform the identification of mitigation or adaptation measures (paragraph 4.40 and 4.42). Paragraph 4.44 of Section 4 of the NPS also links to advice and requirements set out in Section 5 under related headings (including flood-risk).	The Environmental Statement (including Chapter 15, **Document 6.15**) sets out how the application proposal will take account of the potential impact of **Climate Change**. In particular account is taken of climate change issues on key topics areas across the ES, including most notably water resources, air quality and transport. The **flood-risk assessment (ES Appendix 9.2)** and **drainage strategy (ES Appendices 9.3 and 9.4)** which form part of the proposals explicitly make provision for climate change in terms of adapting to changing weather patterns including more frequent storm events. The ES includes an **Energy Strategy and Carbon Management Plan (ES Appendices 15.4 and 15.5 respectively)** which set out measures which form part of the climate change mitigation and adaptation. The work concludes that the application proposal will be designed to take account of climate change and there are no critical features that could be affected by more radical changes to the climate. The **Main Site DAD (Document 5.5A)** also helps show how the approach to the design of the scheme will minimise effects

		on climate change through low carbon elements to the design and construction of the proposals.
4.45 – 4.52	The NPS provides a detailed overview of **pollution control and other regulatory regimes,** with cross-reference to the Environmental Permitting regime relevant to various forms of industrial facility.	The ES includes consideration of relevant 'pollution' issues – see below with regard to '***dust, odour, light'***, and '***noise and vibration*****'** in response to NPS **Section 5**. Pollution control and other regulatory issues are also considered in the context of the **Waste** and Materials chapter of the ES (**ES Chapter 13, Document 6.13**), and the work undertaken in relation to the need for works within the Ardley Landfill site which has implications on the waste permitting regime overseen by the Environment Agency (EA). The Applicant has engaged in detail with the EA with regard to the technical and procedural aspects of these proposed works.
4.57 – 4.70	The NPS provides policy advice regarding **Safety,** and **Security** in two related sub-sections of Section 4. This includes policy regarding 'road safety' (and a section on rail which is not directly relevant to the proposed development). Key relevant issues with regard to road **safety** include (paragraph 4.57): - Considering wider objectives including "*expanding active travel and creating safe and pleasant walking, wheeling and cycling environments*" – active travel also forms part of the policy in NPS Section 5; - Road schemes should consider driver and rider needs, including rest opportunities for HGV	An interim Stage 1 Road Safety Audit has been carried out for the highway works as they were envisaged in May 2025 and a copy of the Audit and the Response Report are appended to the TA (ES Appendix 3.1). The findings of that Interim Audit were used to inform the highway works design which formed part of the Stage 2 Statutory Consultation in 2025. A final Stage 1 Road Safety Audit covering all of the highway works, as submitted, will be completed in due course and the highway design will be updated to reflect any agreed changes arising from the Audit. To the extent that they are relevant, the submitted application has given direct consideration to safety and security issues. With regard to highways safety, the submitted TA and other detail included with **ES Chapter 3 Transport (Document 6.3)** and associated appendices

	drivers – this issue also forms part of NPS Section 5. The NPS requires an assessment of safety by Applicants (paragraph 4.58), and demonstrate consistency with national Road Safety policies (paragraph 4.59), as well as demonstrating safety has been considered from the outset with rigorous processes for monitoring and evaluating safety (paragraph 4.60). The **Security** element of this part of the NPS is clear that security matters involve various parts of Government, and that such issues are unlikely to form major parts of examinations of projects.	including the TA include reference to safety considerations and design processes relevant to inform elements of the infrastructure design. The integration of extensive walking and cycling connectivity within the scheme has been undertaken with regard to ensuring safe and pleasant routes and links are provided. To the extent they are relevant to the proposed development, these elements of the NPS to are demonstrably satisfied by the submitted material.
Paragraphs 4.71 – 4.72	Section 4 of the NPS includes a short section on **Health**, with many of the issues identified in general terms then addressed in further detail in Section 5 of the NPS (below). The NPS requires Applicants to consider direct and indirect potential impacts on health related to "*traffic, noise, vibration, air quality and emissions, light pollution, community severance, dust, odour, polluting water, hazardous waste and pests"* (paragraph 4.71). Applications should seek to "*avoid or mitigate*" adverse health impacts, and seek enhancement opportunities such as through promoting local active travel (and horse riders) through safe and attractive routes (paragraph 4.72).	The **Environmental Statement (Document series 6)** considers the effects of the scheme on human health. An assessment of the effects on health is incorporated into relevant Environmental Statement chapters including with respect of traffic, noise and vibration, air quality (including dust and odour), lighting, water resources, ground conditions and waste. The Proposed Development will be of relevance to wider 'health and well-being' agendas with regard to the potential for positive effects relating to improved access to jobs and services, notably increased opportunities for 'active travel' (cycling and walking) for employees and local residents alike, and wider benefits associated with access to green spaces for recreation and amenity.

		These matters are brought together in the Socio-Economic Chapter of the Environmental Statement, which concludes that the scheme will; overall, have a positive effect on human health. A **Health Impact Assessment** is submitted as **ES Appendix 12.3 (Document 6.12C).**
Paragraphs 4.73 – 4.78	The **Accessibility** element of Section 4 of the NPS identifies the high-level commitment by government to create a more accessible and inclusive transport network which "*provides a range of opportunities for people to connect with jobs, services and friends and family*" (paragraph 4.73). Applicants are expected to improve access, where possible, on and around the national networks, including for disabled users. The NPS refers to the obligations under the Equality Act 2010 (paragraph 4.75). Applicants are required to demonstrate (where relevant) (paragraph 4.78): - *All reasonable opportunities have been taken to deliver improvements to accessibility on and to the national road network;* - *Reductions in community severance as part of improved accessibility;* - *Accessible infrastructure as part of 'good design'.* -	The submitted Application includes details of the accessibility issues and improvements considered and proposed as part of the Proposed Development. Details are set out in various parts of the Application, including the **Transport Chapter of the ES (Document 6.3)**, and relevant parts and appendices to the Transport Assessment, which include a **Sustainable Transport Strategy (as a TA Appendix, Document 6.3A1)**. The Application also includes a **Framework Travel Plan (ES Appendix 3.2, Document 6.3B)** which sets the principles and a range of site-wide initiatives to ensure the site and job opportunities are accessible by a range of modes of transport. The **Design Approach Documents (Document series 5.5)** also include details of access and accessibility.
Strategic Rail Freight Interchanges		
4.80	The NPS describes in general terms **the 'function' of rail freight interchanges** as: *"Rail freight interchanges are not only locations for freight access to the railway, but also locations for businesses,*	The OxSRFI will provide good access to the strategic road network – M40 motorway, and A43 trunk road - which will be enhanced through the highway mitigation works proposed. As an SRFI the proposals include not only new and improved

	capable now or in the future, of supporting their commercial activities by rail. Therefore, from the outset, a Rail Freight Interchange should be planned and developed in a form that can accommodate both rail and non-rail activities including ensuring appropriate provision for Heavy Goods Vehicle drivers using the Interchange."	transport infrastructure, but also commercial floorspace to meet a range of business needs in the distribution and logistics sector (up to 603,850 sq.m. (approximately 6.5 million sq.ft) plus an allowance for mezzanine space of up to 201,28m sq.m.). The OxSRFI scheme provides rail access onto the Chiltern Main Line which is part of the strategic freight network. The line operates as a freight diversion route and will be cleared to Network Rail's W8 structure gauge as required by the NPS. The OxSRFI will therefore fully comply with the NPS in terms of providing the required access to rail freight traffic. The M40 corridor is a key arterial route for distribution traffic, but currently underserved by SRFIs. The submitted **Rail Documents (Document series 7.2)** provide details regarding the technical and operational specification and approach to the proposed rail terminal, including statements from Network Rail, and GBRail Freight. The **Market Analysis Report (Document 7.1)** identifies the strength of the market for logistics and rail freight logistics in the local area in the context of the M40 corridor. It explains the Markets that will be served by the OxSRFI how the scheme will help to expand the network of SRFI's into the south-east. Key urban centres nearby include Bicester and Banbury, as well as the growing community at Heyford Park, with the market area for OxSRFI also considered to extend to Birmingham and parts of London. As referred to in the **Planning Statement (Document 5.4),** and the **Main Site Design Approach Document (Document 5.5)** the design of the proposals has responded
4.81 - 4.84	The NPS defines **'transport links and location requirements for SRFIs** (or extensions to existing rail freight interchanges) – these include the following specific elements: - *It is important that new SRFIs are appropriately located relative to the markets they will serve, which will focus largely on major urban centres, or groups of centres, and key supply chain routes.* - *The majority of freight movements by rail will end with transport by road to the final destination so, proposed new rail freight interchanges should have **good road access**.* - *[SRFIs should] **provide appropriate parking and associated facilities for those using the interchange to ensure Heavy Goods Vehicle driver wellbeing is observed.*** - *Due to these requirements, it **may be that countryside locations are required** for SRFIs.* - ***Adequate links to the rail and road networks** are essential.* - *As a minimum, a SRFI should ideally be located on a route with a **gauge clearance of W8 or more**, **or capable of enhancement** to a suitable gauge.*	

	- *SRFIs tend to be large scale commercial operations, which are most likely to need **continuous working arrangements (up to 24 hours**).* - *By necessity they involve large structures, buildings and the operation of heavy machinery. In terms of location therefore, they **may not be considered suitable adjacent to residential areas or environmentally sensitive areas** such as National Parks, the Broads and Areas of Outstanding Natural Beauty. However, depending on circumstances, **appropriate mitigation measures may be available to limit the impacts of visual intrusion, noise and light.*** - ***SFRIs can provide many benefits for the local economy**. For example, because many of the on-site functions of major distribution operations are relatively labour intensive, this can create many new job opportunities. The existence of an available and economic **local workforce** will therefore be an important consideration for the applicant."*	directly and evolved as a result of consideration of environmental issues including surrounding land-uses (current or potential future development). The likely economic benefits from the Proposed Development are set out in **ES Chapter 12 Socio-Economics (Document 6.12)**, and in the Market Analysis Report (referred to above). These include around 9600 new jobs (FTE, gross) in the operational phase, with around 790 construction jobs also expected. The assessment identifies a suitable workforce from across Cherwell District and other local areas beyond. The Proposed Development is estimated to generate £361.2m in net additional GVA per annum to the local economy.
4.85 – 4.89	With regard to 'scale and design' of SRFIs, the NPS includes the following specific requirements: *"4.89 As a minimum, a SRFI should be capable of handling four trains per day and, where possible, be capable of increasing the number of trains handled. **SRFIs should, where possible, have the capability to handle 775 metre trains with appropriately configured on-site infrastructure and layout**. This should seek to minimise the need for on-site rail shunting and provide for a configuration which, ideally, will **allow***	The OxSRFI scheme has been devised to meet functional and 'scale' related requirements of the NPS in full. The rail terminal will be capable of handling at least four trains per day. It will be capable of accommodating 775 meter trains from the outset and it will minimise the need for onsite shunting. It will also allow main line access for trains from either direction at the outset. The terminal will then be capable of expansion so that it can ultimately handle 12 trains per day. The scale and form of the terminal allows for

	***main line access for trains from either direction**. To create an environment that is capable of seamlessly transferring freight from road to rail, it is **essential that SRFIs make appropriate provision for the receipt of Heavy Goods Vehicles using the SRFI**, both for general site accessibility, including the capability of the local road network to accommodate large vehicles, and for providing adequate and secure **Heavy Goods Vehicle parking provision with associated proportionate services and facilities to support driver wellbeing and legal requirements to rest**."*	flexibility in its use and expansion, See description and Plans at Chapter 2 of the Environmental Statement. OxSRFI will provide for a number of rail connected and rail accessible buildings subject to occupier needs. The rail terminal will be significant (see phasing description in Chapter 2 of the Environmental Statement, **Document 6.2**), it will provide an operational rail network connection and a large area for intermodal handling and container storage. The terminal will be available for use prior to the occupation of more than 2.5 million sq.ft of floorspace. The terminal area includes provision for appropriate HGV parking, with the wider Main Site also incorporating an HGV Parking facility with driver welfare facilities.
5. Generic Impacts		
Air Quality		
Paragraph 5.12 and 5.14	Applicants are expected to undertake an assessment where there are likely significant air quality effects (on or off scheme), with reference to the Air Quality Standards Regulations 2010 and the ability of the local authority to comply with The Air Quality (England) Regulations 2000. Paragraph 5.14 refers to The Environmental Targets (Fine Particulate Matter) (England) Regulations 2023, and available DEFRA guidance to inform the assessment.	The effects of the scheme on **air quality** have been assessed and the likely impacts set out in the Environmental Statement **(ES Chapter 4, Document 6.4)**. The Assessment includes consideration (and data) regarding baseline conditions, and then uses data from the Transport Assessment and other data to consider and forecast potential effects from the Proposed Development during both construction and operational phases. The assessment includes opening and completion (future) year scenario analyses.

Paragraph 5.13	Describes what the assessment should include, with reference to (in summary): - Existing air quality (baseline) - Forecasts at the time of opening, and assessing the impact of the scheme; - Any significant effects.	A range of mitigation measures are identified for both construction and operational phase, with the former being incorporated into the **CEMP (ES Appendix 2.3, Document 6.2C)** to minimise or avoid potential effects on nearby receptors.
Mitigation issues: paragraphs 5.17 – 5.21	The NPS identifies the importance of mitigation in respect of air quality, especially where a project is likely to lead to a breach in relevant statutory limits or targets (paragraph 5.18), and defines some of the general mitigation responses which may be considered. The NPS expects "*all reasonable mitigation action to be taken*" (paragraph 5.19).	The operational phase design and mitigation measures relevant to mitigation of air quality effects include the extensive provision of green infrastructure and 'active travel' links as part of measures to enable a reduction in single-occupancy car use, as well as use of on-site renewable energy as part of wider 'low carbon' design.
Paragraph 5.25	The NPS is clear that consent should be refused where a scheme would, after mitigation, result in either: - A zone currently reported as being compliant with standards becoming non-compliant; or - Affecting the ability of a non-compliant area to achieve compliance.	The ES Air Quality assessment **(ES Chapter 4, Document 6.4)** confirms that the Proposed Development will not affect the ability of the relevant 'zone' to comply with air quality standards.
Greenhouse gas emissions		
Paragraphs 5.26 – 5.35	The NPS recognises that the construction and operation of national network infrastructure "*will in itself lead to carbon emissions*" (paragraph 5.28), but also recognises the "*important role in supporting decarbonisation*" played by the national infrastructure (paragraph 5.30). A 'Whole Life Carbon Assessment' is required by the NPS (paragraph 5.32).	The **Environmental Statement (including Chapter 15)** sets out how the application proposal will take account of the potential impact of climate change. The ES Chapter include relevant technical appendices including a **Greenhouse Gas Assessment** at Appendix 15.2 (Document 6.15B), and a **Carbon Management Plan** (at **Appendix 15.5, Document 6.15E).**

		The Climate Change chapter considers all components of the proposals, including the Highways Works. The Carbon Management Plan takes a life cycle assessment approach and satisfies the requirements of the NPS.
Mitigation issues: paragraphs 5.36 – 5.37	The NPS requires applicants to "*look for opportunities within the design to embed nature-based or technological solutions to mitigate, capture or off-set*" emissions. The NPS suggests that a Carbon Management Plan should form part of DCO submissions to set out steps to minimise capture or offset emissions. Paragraph 5.40 also refers to the "*positive weight*" given to embedded nature-based or technological solutions in decision-making.	The **ES (Document series 6)** assessment considers the impacts on greenhouse gas emissions during construction and operational phases of the proposed development as a whole. As part of the Proposed Development mitigation measures include 'technological' responses through building techniques and materials, but also the inclusion of solar PV on building roof space, and the construction of all warehousing being 'future-proofed' so as to be able to accommodate more PV, up to 100% of available roof-space., subject to future need and demand (and an ability to feed-in to the grid). As required by the NPS, mitigation also features 'nature-based solutions' through use of green infrastructure and tree and other planting, as well as integration of sustainable drainage systems within the proposals.
Paragraphs 5.38 – 5.42	The NPS refers to the UK 'carbon budgets' as part of the assessment of impact, and is clear that operational carbon emissions cannot be totally avoided and a net increase "*is not, of itself, reason to prohibit consenting a national network project*" (NPSNN paragraph 5.41). In decision-making the Secretary of State needs to be satisfied that "*as far as possible*" the Applicant has assessed carbon emissions for all stages of the	The submitted **ES Chapter 15 (Climate Change, Document 6.15)** and associated appendices demonstrate compliance with the requirements of the NPS to assess carbon emissions. The scope of the EIA – agreed with relevant consultees – includes: - The greenhouse gas (GHG) emissions caused directly or indirectly by the Proposed Development;

	development. The NPSNN is clear regarding the strategic context for assessments of carbon viewed in the context of national carbon budgets, but only projects which would have a material impact on the ability of government to achieve statutory carbon budgets should be refused (paragraph 5.42)	- The effect of changes in climate on the Project, and resulting risks; The assessment has direct regard to the UK's 'net zero' trajectory and UK policies and commitments, including the Climate Change Act 2008 and national 'carbon budgets', as well a local planning policies. The Chapter includes details of the embedded and other mitigation measures to help minimise effects. This includes such measures as achieving an earthworks balance on site to remove the need for extensive movements of material on or off-site, integration of green infrastructure, and building design principles and measures linked to energy and water consumption (including energy performance and efficiency, and BREEAM 'Excellent' standards being met or exceeded). The assessment is based on realistic but worst-case assumptions. The results of the assessment confirms that the proposals are not in the category referred to in NPS paragraph 5.42, and do not present any effects which would indicate consent should not be granted.
Biodiversity and nature conservation		
5.46 and 5.47	The NPS states that Applicants should consider the potential "direct and indirect impacts on ecosystems including…….habitats and protected species and the interactions between these, and….information proportionate to the likely impacts of the infrastructure on biodiversity and nature" (paragraph 5.46).	**Environmental Statement Chapter 6 (Document 6.6)** includes an assessment of the full range of ecological effects of the Proposed Development in accordance with the NPS. This includes a comprehensive suite of surveys and assessment to understand the existing baseline conditions and character of the site, and underlines the largely arable agricultural use of the Application Site as a whole, including the Main Site.

	The NPS requires a 'Biodiversity Gain Statement' to show how the project has taken "opportunities to conserve and enhance biodiversity and geological conservation interests……as well as deliver biodiversity net gain" (paragraph 5.47).	The construction process will be controlled through Construction Environment Management Plan **(CEMP) at ES Appendix 2.3 (Document 6.2C).** Measures are proposed and will be controlled through requirements to ensure that retained areas of existing habitats or features of value are secured and protected and that best practice is employed to minimise the disturbance to species and habitats. It also identifies how the scheme will enhance biodiversity and deliver a net gain (of more than 10%, despite not being mandatory to do so). setting out in detail the baseline conditions and the outcomes in terms of net gain of the proposals. Through new planting and habitat creation as part of a wider package of green infrastructure, the Scheme will enhance biodiversity, exceeding a 10% net gain with a range and mix of new habitats created. The Highways Works include some appropriate additional landscaping and planting within the design, consistent with highways design standards and requirements. Requirements are proposed which will secure the implementation of new landscaping together with its long-term management, including in terms of biodiversity management. A separate **Habitats Mitigation and Management Plan (HMMP) (ES Appendix 6.11, Document 6.6K)** has also been prepared to secure the BNG benefits proposed over the long-term.
5.48 – 5.52	The NPS requires Applicants to demonstrate how they have avoided direct and indirect harm or disturbance, with reference to examples such as (paragraph 5.48):	The ES (Chapter 9) fully considers the ecological impacts of the proposals, and confirms they will not have any significant

	- Minimising development footprints or retaining "*important habitat features*" in a site; - Green infrastructure and other provision within the design to "*minimise habitat fragmentation*"; - Construction management to confine activities to certain areas; - Best practice measures to avoid disturbance during operation or construction stages. The NPS encourages Applicants to go beyond just mitigation of harm – it says "*Opportunities will be taken to enhance, expand or connect existing habitats and create new habitats in accordance with biodiversity net gain requirements"* (paragraph 5.51), and links this to climate change resilience with regard to species selection. Paragraph 5.52 of the NPS encourages wider multi-functional benefits, such as through integrating biodiversity with sustainable drainage systems, and refers to the potential for "*attractive amenity areas*" to be provided.	effects on designated ecological sites. Details of the mitigation proposed is set out in full, including **the HMMP at Appendix 6.11 (Document 6.6K)** to secure ongoing management of the created and retained habitats, and the benefits they will deliver. The Applicant has worked closely with key consultees, including Natural England, and some elements of the proposed mitigation has been informed by that dialogue, including with regard to avoiding or mitigating potential impacts on protected species known to be present within or close to the site. The proposals fully comply with the requirements of the NPS.
5.53 – 5.69	The NPS provides comprehensive details regarding relevant issues and consideration for decision-making by the Secretary of State. This includes the general principles (paragraph 5.55) of: 1. Avoid significant harm to biodiversity or geological conservation interests, including through alternatives; 2. Mitigating harm where it can't be avoided.	

	3. Compensating as a last resort where significant harm cannot be avoided or mitigated. The NPS gives "*significant weight*" to any residual harm. The NPS also refers to ensuring "*appropriate weight is attached*" to designated sites, irreplaceable habitats protected species and habitats, and other species or interests (paragraph 5.56), with reference to local nature recovery strategies as a source of guidance as to these in the relevant local context. Later paragraphs (5.58 – 5.69) provide specific guidance regarding these designated habitats and sites (see below). The advice of Natural England and other bodies is identified as being of particular relevance (paragraph 5.57).	
	Paragraphs 5.60 – 5.61 include specific content regarding the effects of NSIPs on SSSIs as nationally important nature sites. The NPS (at paragraph 5.61) has a presumption against approval of development which would have "*an adverse effect*" on a SSSI with consent only granted "*where the benefits of the development proposed clearly outweigh both its likely impact on the features of the site which make it of special scientific interest, and any broader impacts on the national network of SSSIs.*" The NPS requires the Secretary of State to ensure Applicant's proposals to mitigate effects and, where possible, ensure conservation and enhancement, are acceptable.	Where any adverse effect is expected to have an adverse effect on an SSSI – even if not a likely significant effect - the NPS essentially requires a planning balancing exercise to compare any such effect against the wider benefits. **ES Chapter 6** (see revision A of **Document 6.6** as amended at Deadline 2) confirms that minor adverse (not significant) such effects are likely associated with changes to concentrations of air borne pollutants. The **Planning Statement** (see revision A of **Document 5.4** as amended at Deadline 2) includes a 'planning balancing' process (at Section 6 of that document), and as required by the NPS, explicitly includes consideration of that minor adverse impact along with other likely adverse effects against the various and significant benefits of the OxSRFI

	Paragraph 5.63 includes a presumption against the loss of ancient woodland, or veteran trees "*unless there are wholly exceptional reasons* (*for example, where the public benefit would clearly outweigh the loss or deterioration of habitat*) *and a suitable compensation strategy exists.*"	scheme. Section 5 of the Planning Statement also considers the impacts on the SSSI, including reference to the significant new habitat creation which would support and enhance similar (geological) features common to the SSSI. The Proposed Development would result in the loss of a single veteran tree (but no loss of any Ancient Woodland). **ES Chapter 6** (revision A of **Document 6.6**), and the Planning Statement (see revision A of **Document 5.4**) fully consider this in the context of NPS policy, including with reference to the proposed mitigation (compensation) strategy. Therefore, the proposals accord fully with the NPS: the Applicant has undertaken the required 'balancing' and identified a clear balance in favour of the scheme, and provided the detail required to enable the decision-maker to also reach a judgement on the overall balance.
Resources and waste management		
5.70 – 5.78	The NPS positions policy with direct reference to protection of human health and environment by reducing waste "*in accordance with the principles set out in the waste hierarchy, and to maximise resource use by moving towards a more circular economy*." (paragraph 5.70) Applicants are expected to demonstrate they will adhere to the waste hierarchy: *"preventing and reducing waste produced in the first place and maximising preparation for reuse and*	The effects of the Proposed Development with regard to construction and operational waste and materials has been assessed in the **Environmental Statement (Chapter 13, Document 6.13).** Following the implementation of the design and mitigation measures, as outlined within the assessment, it is concluded that the Proposed Development would not give rise to any significant residual effects.

	recycling for waste that cannot be prevented. Where possible, applicants are encouraged to use existing materials first, then low carbon materials, sustainable sources, and local suppliers." (paragraph 5.71) The NPS identifies examples of appropriate mitigation, including: - *A circular approach to waste management is encouraged from the offset, for example, green and sustainable procurement exercises or using sustainably sourced materials from local suppliers.* - Reduction and minimisation through "*the waste hierarchy*" including prevention, re-use, and recycling, before disposal. (paragraph 5.73) - "*Modern Methods of Construction……use of low carbon concrete and other sustainable design practices, where possible*" (paragraph 5.75). In decision making, consideration will be given to: - *"the extent to which the applicant has proposed an effective process that will be followed to ensure safe and effective management of waste arising from the construction and operation of the proposed development"* (paragraph 5.76) - *"Where possible…….the reuse of materials and use of sustainable materials and recycled materials."* (paragraph 5.78)	This follows implementation of mitigation measures for all works, including the Highways Works, which will deliver an earthworks balance, minimising or removing the need for any material to be taken off-site, and sustainable practices to the limited demolition and other construction practices. This includes best practice design and operation measures to minimise impacts are considered and the occupiers will operate the DCO Scheme using existing on-site waste prevention, minimisation and management processes and procedures to drive good practice behaviour and contracts, to maximise action in the highest tiers of the Waste Hierarchy and adherence to the proximity principle. In addition, the **Climate Change Chapter of the ES (Chapter 15, Document 6.15)** includes as an Appendix a **Carbon Management Plan (ES Appendix 15.5, Document 6.15E)** which includes details of construction and operational measures to reduce carbon emissions and waste, including through exploring opportunities for reduced and low carbon products through procurement (i.e. using lower recycled materials or off-site construction) and encouraging adoption of low carbon construction practices including achieving an earthworks 'balance' across the scheme to reduce the need for transport movements of imported material.
Dust, Odour, Light, smoke and steam		

5.117 – 5.125	The NPS identifies these as part of the potential 'emissions' from development projects. Although the NPS is clear that *"some impact on amenity for local communities is likely to be unavoidable. Impacts should be kept to a minimum and should be at a level that is acceptable."* The NPS requires an appropriate assessment, and suitable mitigation to be identified, with consideration given to any statutory nuisance effects.	The Environmental Statement includes an assessment of the any relevant or likely effects of odour and dust (in **ES Chapter 4 Air Quality & Odour**, **Document 6.4**). While dust is a common construction related potential effect of major development and infrastructure schemes – mitigated and managed through fairly common measures and techniques set out in the submitted **CEMP (ES Appendix 2.3)** – likely significant effects from odour are less common. In the context of the OxSRFI proposals, odour is most a relevant consideration due to the requirement for construction works in part of the former Ardley Landfill. Mitigation is proposed, to be secured by proposed DCO Requirement and an outline **Odour Management Plan (ES Appendix 4.6)** associated with the CEMP. No significant adverse effects are considered likely from odour with mitigation in place. The assessment of the effects of artificial light are presented in the **Lighting** Chapter (Chapter 8 of the ES, **Document 6.8**). A lighting strategy is defined for the scheme **(ES Appendix 8.1)**, with details to be secured by proposed DCO Requirement. No significant adverse effects are likely with the strategy implemented as proposed. The Proposed Development will not produce smoke or steam, and these are outside the scope of the ES.
Flood Risk		
5.126	The NPS cross-refers directly to the NPPF, and the principle of avoiding development in areas at risk of flooding, and with reference to wider policy relating to climate change.	The **submitted ES Chapter 9 (Document 6.9)** includes a Flood Risk Assessment (at **ES Appendix 9.2, Document 6.9B**) as required by the NPS. This has been prepared with engagement with the LLFA, and Environment Agency.

	Flood Risk Assessments (FRAs) are required for most NSIPs either due to location or site size.	
5.138-5.139	The NPS to the potential for 'nature based solutions' as part of adaptation and mitigation, including BNG, as well as to considering the ***risks of flooding*** or impacts (direct or indirect) on flood-risk NPS prioritises use of Sustainable Drainage Systems as one of the mitigation features to be secured, along with vegetation and other 'design' elements.	The proposed drainage strategy includes Sustainable Drainage System (SuDS) which include the provision of water storage and balancing areas to manage and control surface run-off (for the Main Site and proposed highways works). The development would provide betterment in terms of reducing existing localised flood-risk issues. The Proposed Development would contribute towards delivering sustainable development including in terms of managing and responding to the climate change agenda. Details of the proposed drainage strategy are set out in **ES Appendices** 9.3 for the Main Site, and 9.4 for the off-site areas and Highways – **Documents 6.9C and 6.9D** respectively). Design details and specification of the drainage design is to be confirmed and agreed with the relevant consultees via proposed DCO Requirements. The proposals fully accord with relevant NPS polices.
Land contamination and instability		
5.152 – 5.153	The NPS identifies the risks of not considering and addressing land instability, including to human health and safety, as well as wider environmental risks. Land contamination can similarly harm human health, plus a range of environmental features such as water, soils, and habitats. Development should to remediate despoiled or contaminated land where possible.	The submitted ES includes an assessment of ground conditions (**Chapter 11**, **Document 6.11**). This, and the technical appendices, provide a comprehensive assessment of the proposals in terms of both soil and ground characteristics (geotechnical), and contamination, following appropriate desk-based and site evaluations and investigations.

		Residual effects are assessed as negligible and not significant. This element of NPS policy is fully addressed. The NPS policies and requirements around waste issues are also relevant.
5.154 – 5.156	The NPS expects both issues to be addressed and "*unacceptable risks*" prevented: "*Applicants should ensure that any necessary investigations are undertaken, in accordance with Land Contamination Risk Management guidance, to ascertain the risk from contamination and identify sensitive receptors and that their sites are, and will, remain stable or can be made so as part of the development*." (paragraph 5.156)	
5.157 – 5.159	The NPS identifies examples of the types of measures which may form mitigation to minimise both risks of land instability, and risks of land and groundwater contamination. These include: - Consideration to layout to avoid known hazards; - Structural designs to cope with expected ground movement or other hazards; - Ground improvement techniques to reduce risks, including remediation.	
Landscape and visual impacts		
5.162 and 5.164.	NPS requires consideration of impacts, and mitigation to be identified, during both construction and operational phases.	The Environmental Statement (ES) includes an assessment of landscape and visual effects in accordance with the requirements of the NPS and best practice – this is contained in **ES Chapter 7 (Document 6.7)**. The Assessment considered the likely effects during both construction and operational phases, and takes account of the proposed embedded (and any additional) mitigation measures during both phases to minimise or avoid effects on relevant on and off-site receptors.
5.166	NPS refers to the potential for measures such as bunds or other earthworks to form part of mitigation to minimise effects and impacts	
5.169	Regarding landscape and visual effects the aim should be	

	"*to avoid or minimise harm to the landscape, where adverse impacts are unavoidable providing reasonable mitigation and deliver landscape enhancement measures where possible and appropriate*"	In the context of landscaping and visual assessment primary mitigation measures have been incorporated as an integral part of the design and layout of the proposal. These include the siting, layout and heights of development and consideration of earthworks and ground modelling and the proposed landscaping of the site. Details are set out in the ES Chapter 7 and the **DADs (Document series 5.5),** as well as shown on the **Parameters Plan (Document 2.5)**. The landscaping mitigation in the form of landscaped earthworks mounds forms part of the extensive Green Infrastructure described in this schedule and across the main body of the **Planning Statement**. The landscape led approach to the scheme's evolution, including the approach to embedded mitigation features, is also set out in the **Main Site DAD (Document 5.5A)**. The ES assessment identifies the likely effectiveness of the proposed mitigation in minimising and avoiding significant effects on many receptors, with residual significant landscape effects being limited to the landform of the Main Site and its immediate context. Residual significant visual effects are also limited to rights of way users in the immediate site context as a consequence of the extent of change.
Land Use, including Open Space, Green Infrastructure and Green Belt		
5.179 – 5.188	The introductory text in this section of the NPS includes a specific reference to SRFIs (highlighted below in bold):	The OxSRFI scheme incorporates significant new areas of publically accessible green space as part of a comprehensive provision of Green Infrastructure which accounts for around 60% of the Application Site. This will deliver multiple benefits

	5.179 Access to high quality open spaces and the countryside[x] and opportunities for sport and recreation can be a means of providing necessary mitigation and/or compensation requirements. Green infrastructure is a network of multifunctional green and blue features and other natural features, urban and rural, which are capable of delivering a wide range of environmental, economic, health and wellbeing benefits for nature, climate, local and wider communities and prosperity. Green Infrastructure can include nature-based solutions to prevent or reduce environmental impacts. Green infrastructure can also enable developments to provide positive environmental, social and economic benefits[118]. The Green Infrastructure Framework – Principles and Standards for England can be used to consider green infrastructure in development and plan for good quality and targeted creation or improvement.[119]. *5.180 The re-use of previously developed land for new development can make a major contribution to sustainable development by reducing the amount of countryside and undeveloped greenfield land that needs to be used. However, this may not be possible for some forms of infrastructure, particularly linear infrastructure such as roads and railway lines. Similarly, for* ***strategic rail freight interchanges****, brownfield land[y] may not be economically or commercially feasible, albeit applicants will need to demonstrate clearly why the use of brownfield land is not appropriate.* *5.181 Green Belts, defined in a development plan, are situated around certain cities and large built-up areas.*	in terms of access to the countryside and recreation, including integrated 'active travel' opportunities which can bring health and environmental benefits (linked to sustainable travel and mode shift away from the private car). The development will also see increased 'blue' infrastructure, with sustainable drainage systems forming part of the proposed drainage strategy, and supporting elements of the ecological mitigation and enhancements proposed (including notable Biodiversity Net Gain). Changes to existing rights of way are proposed and integrated into the Green Infrastructure. The general encouragement of use of previously developed 'brownfield' land for development is noted, as is the recognition in the NPS of the likelihood that suitable sites will not be feasible for SRFIs. The **Alternative Sites Assessment (at ES Appendix 2.4, Document 6.2D)** sets out the sites considered, and confirms no suitable brownfield sites exist to accommodate the OxSRFI proposals. The application site is not in the Green Belt and does not have any special protection in terms of its landscape.

	The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence."	
5.183 – 5.188	The NPS provides guidance regarding the approach taken in **Applicants' assessments** which should: "…*acknowledge the importance of considering and **making the best use of land** to deliver multiple different outcomes, both in terms of ensuring the land is suitable for the proposed infrastructure and in terms of exploring multifunctional outcomes from a particular action."* (paragraph 5.183). "…*identify e**xisting and proposed[z] land uses near the project**, any effects of replacing an existing development or use of the site with the proposed project, or preventing a development or use on a neighbouring site from continuing. Applicants should also assess any effects of precluding a new development or use proposed in the development plan. The assessment should be proportionate*." (paragraph 5.184) The NPS includes further details (5.187 – 5.188) focused on NSIPs in the **Green Belt**.	As referred to above, the Proposed Development includes significant multi-functional Green Infrastructure which will support or deliver both mitigation as well as wider benefits. The Applicant has taken a landscape led approach to the evolution of the proposals, including direct regard to the relationship with existing and emerging land-uses nearby. In landscape and visual terms, and with regard to design of the OxSRFI scheme, this has included direct consideration of both consented but not developed residential sites in the vicinity of the Main Site (including around Camp Road and within Heyford Park), and emerging, unconsented (not 'committed') development. The **Main Site Design Approach Document (DAD, Document 5.5A)** includes details of the evolution and alternative designs considered over the lifetime of the project to date. As also explained in the Planning Statement, the scheme parameters were amended, with reductions in maximum building heights and increased landscaping buffers (heights and depths) in direct response to concerns from neighbouring developers (Dorchester) with respect of future planned development in Heyford Park. As confirmed above, no part of the application site is in the Green Belt. The Proposed Development is considered to comply fully with these elements of the NPS.

5.189 – 5.191	Guidance is provided regarding **Agricultural Land**, and **Mineral Resources**: *"Applicants should take into account the economic and other benefits of the best and most versatile agricultural land (defined as land in grades 1, 2 and 3a of the Agricultural Land Classification). Where significant development of agricultural land is demonstrated to be necessary, applicants should seek to use areas of poorer quality land in preference to that of a higher quality. Applicants should also identify any effects, and seek to minimise impacts, on soil health and protect and improve soils, taking into account any mitigation measures proposed. Soil is an important natural capital resource, providing many essential services such as storing carbon (also known as a carbon sink), reducing the risk of flooding, providing wildlife habitats and delivering global food supplies. Guidance on sustainable soil management can be found in Defra's Construction Code of Practice for the Sustainable Use of Soils on Construction Sites. As a first principle, developments should be on previously developed (brownfield) sites provided that it is not of high environmental value (see paragraphs 5.152 to 5.159).* *5.190 The **Agricultural Land** Classification[121] is the only approved system for grading agricultural quality in England and Wales. If necessary, field surveys should be used to establish the Agricultural Land Classification grades in accordance with the current grading criteria, or any successor to it and identify the soil types to inform soil management at the construction, operation*	The effects of the scheme on agricultural land and soil management are set out in the Agricultural Land Quality Chapter of the **Environmental Statement (ES, Chapter 14, Document 6.14)**. A small proportion of the Application Site is in the 'best and most versatile' category of agricultural land (37.7 ha, some 8% of the total Application Site area). Albeit still a 'significant' effect in EIA terms, soils will be protected and re-used to help support the on-site landscaping (with soil protection measures to underpin a Soil Management Plan proposed as part of the Framework **CEMP, Document 6.2C, ES Appendix 2.3)**. The effect of the proposal on on-site mineral resources is set out in the **Ground Conditions Chapter (Chapter 11, Document 6.11)** of the ES. The Main Site is located within a large Mineral Safeguarding Area. Mitigation is proposed to make use of exploited mineral resources where encountered during the construction process, reducing the need for off-site aggregates to be brought to site, but some residual harm is identified to the policies of the OCC Minerals and Waste Core Strategy in terms of potentially sterilised resource is identified. The proposals include extensive new woodland and other planting as part of the comprehensive Green Infrastructure proposed. This includes a mix of new native woodland, trees, hedgerows, scrub extending around the built development zones. This will encompass broad landscape swathes to all sides of the Main Site and alongside all new highways and junction areas. New planting will include variations in the woodland, structural and scrub planting species, sizes and densities and to the trees, hedgerows and other planting within and around the development zones. In addition, efforts

	and decommissioning phases in line with the Defra Construction Code[122]. Applicants are encouraged to develop and implement a Soil Resources and Management Plan which could help to use and manage soils sustainably and minimise adverse impacts on soil health and potential land contamination. This is to be in line with the ambition set out in the Environmental Improvement Plan for sustainable management of agricultural soils. *5.191 Applicants should safeguard any **mineral resources** on the proposed site as far as possible. Taking into account the policies of the Minerals Planning Authority, applicants should consider whether prior extraction of the minerals would be appropriate."*	have been made to retain key existing woodland features within the site. The Green Infrastructure and integrated new or enhanced walking and cycling routes include diverted or improved PROW. These proposals have been discussed in detail with the OCC Rights of Way Officers, and would improve the connectivity and quality of the network overall, including improved links to Bicester to the east. The Proposed Development is considered to comply fully with these elements of the NPS.
5.192 – 5.203	With regards to **Mitigation and Decision-Making**, the NPS includes the following relevant guidance: *"5.192 Applicants can avoid, or minimise, the direct effects of a project on the existing use of the proposed site or proposed uses near the site, by the application of good design principles, including the layout of the project and the protection of soils during construction.* *5.193 Where green infrastructure is affected, applicants should aim to ensure the functionality and connectivity of the green infrastructure network is maintained and any necessary works are undertaken, where possible, to avoid or mitigate any adverse impact. Applicants should endeavour to improve networks green infrastructure and other areas of open space, including*	

	appropriate access to new coastal access routes, National Trailsaa and other public rights of way." *"5.195 Existing trees and woodlands should be retained where possible. The applicant should assess the impacts on, and loss of, all trees and woodlands within the project boundary and avoid and mitigate for any direct and indirect effects and any risk of net deforestation as a result of the scheme (Irreplaceable Habitats require separate consideration 5.57-5.58). Mitigation may include the use of buffers to enhance resilience, improvements to connectivity, and improved woodland management. Where woodland loss is unavoidable, compensation schemes will be required, and the long-term management and maintenance of newly planted trees should be secured. Opportunities for tree planting and woodland creation should be maximised.* *5.196 Where a proposed development has an impact on a Mineral Safeguarding Area[bb], the Secretary of State should ensure that the applicant has put forward appropriate mitigation measures to safeguard mineral resources.* *5.197 Where a project has a sterilising effect on land use there may be scope for this to be mitigated through, for example, using the land for nature conservation or wildlife corridors, or improving access and connectivity. Other examples include, prioritising active travel or well-designed optimised parking and storage in employment areas with appropriate landscaping."*	

	5.198 Public rights of way, National Trails, and other rights of access to land (for example, open access land) are important recreational facilities for pedestrians, wheelers, cyclists and equestrians. Applicants are expected to take appropriate mitigation measures to address adverse effects on coastal access, National Trails, public rights of way and open access land, and to consider what opportunities there may be to improve access and connectivity. In considering revisions to an existing right of way, consideration needs to be given to the use, character, attractiveness and convenience of the right of way. The Secretary of State should consider whether the mitigation measures put forward by an applicant are acceptable and whether requirements in respect of these measures might be attached to any grant of development consent. *5.201 Where networks of green infrastructure have been identified in development plans, they should be protected from development, and, where possible, strengthened. The environmental and visual value of linear infrastructure and its footprint in supporting biodiversity and ecosystems should also be taken into account, including the creation of new green infrastructure, when assessing the impact on green infrastructure. The value of the development in improving connectivity, particularly through active travel links and recreation should also be taken into account when assessing the impact on green infrastructure.*	
The historic environment		

Paragraphs 5.204 – 5.215	The NPS provides explanation as to what is considered a 'heritage asset', and how Applicant should address and consider them – this is summarised as: *"The applicant should undertake an assessment of any significant heritage impacts of the proposed project and should describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the asset's importance and no more than is sufficient to understand the potential impact of the proposal on their significance."* (paragraph 5.210). Mitigation is required, including recording of assets, and the NPS encourages the use of appropriate DCO Requirements to require any post-consent actions or measures regarding investigations or recording of assets.	The Environmental Statement includes a **Heritage & Archaeology Chapter (ES, Chapter 10, Document 6.10)** which sets out the Applicants assessment of the effects of the proposal on the historic environment. This contains the results of extensive archaeological fieldwork and evaluation to inform the assessment, undertaken in close collaboration with OCC, as well as an assessment of the Proposed Development's relationship with on and off-site built heritage assets. The scheme would retain, and secure a positive new use for, an on-site listed building (Threshing Barn), with details included in the ES and in the **'Central Hub Design Approach Document' (Document 5.5B).** Further archaeological works are to be secured by proposed DCO Requirement, as encouraged by the NPS. Consultation responses and engagement by the Applicant confirms that the level of residual harm on off-site heritage assets is considered to be at the lower end of 'less than substantial' harm by both Historic England and OCC. This harm forms part of the overall 'planning balance' set out in the Planning Statement. The Proposed Development is considered to comply fully with these elements of the NPS.
paragraph 5.216 - 5226	With regard to decision-making, the NPS is consistent with the **NPPF**, with the emphasis on significance of the assets affected, and the scale or nature of the likely impact, and on mitigation to avoid or minimise adverse impacts or harm, with residual harm weighed against public benefits. There is a presumption against "*substantial harm or total loss*" of designated assets (paragraphs 5.220 to 5.222).	
Noise and vibration		

Paragraphs 5.227 – 5.232	The NPS recognises the potential for excessive noise to impact quality of life and health, and use and enjoyment of areas of value, as well as effects on wildlife and biodiversity. The NPS requires an assessment where noise impacts are likely to arise, "*proportionate to the likely noise* im*pact" (paragraph 5.231*), with an emphasis on direct likely impacts. At paragraph 5.230 the NPS sets out elements expected to feature in assessments, including: - *Description of likely noise sources, and characteristics of likely noise;* - *Identification of sensitive premises or areas (receptors);* - *Predictions of likely change to the existing noise environment, including in the construction period;* - *Measures to mitigate likely effects*.	An assessment of the effects of the proposal in relation to noise and vibration, in accordance with the criteria in paragraph 5.189 – 5.192, is set out in the **Environmental Statement Chapter 5, Noise and Vibration (Document 6.5).** The Assessment considers both construction and operational effects, and includes robust assumptions to ensure a realistic worst-case is considered. Data from the Transport Assessment directly informed the assessment of likely noise from traffic associated with the Proposed Development. The Proposed Development is considered to comply fully with these elements of the NPS.
paragraph 5.233 paragraph 5.241	The NPS sets specific guidance as to what should be included in assessments of **noise and vibration**, recognising that effects can be relevant to ecological as well as human 'receptors', and relate to both construction and operational phases. The NPS requires assessments to use the principles of the relevant British Standards and other guidance. Key tests defined by the NPS regarding noise and vibration in decision-making are set out (at NPS paragraph 5.241) and are to: • "*avoid significant adverse impacts on health and quality of life from noise*";	

	• "*mitigate and minimise other adverse impacts on health and quality of life*"; • "*contribute to improvements to health and quality of life through effective management and control of noise, where possible*".	
Socio-Economic impacts		
Paragraph 5.243	The NPS recognises (emphasis added): "*The construction and operation of nationally significant infrastructure projects may have short or longer term economic and social impacts on local communities, businesses or services. The construction period for significant projects can be lengthy; however, this can generate employment through the construction period and benefit the local economy.* ***Applicants should look to maximise local employment opportunities during construction and operational phases****."*	As set out in the socio-economic assessment (**ES Chapter 12, Document 6.12**) OxSRFI will bring about significant benefits to the local economy. The Socio – Economic chapter of the Environmental Statement (Chapter 12) assesses the likely effects of the development, which include the creation of around 9600 jobs, a gross value added (GVA) to the local economy of approximately £361.2m (net additional annually) and represents a total investment of around £1 billion. See Environmental Statement Chapter 12 for further socio-economic context. The Proposed Development would generate high quality employment opportunities across a range of occupations as well as training and upskilling opportunities. These training opportunities will support unemployed and economically inactive local residents, helping them return into work and reduce local skills gaps during the construction phase of all components of the proposals. The ES Chapter confirms the availability of an appropriate workforce and the effects of the scheme on commuting patterns. It concludes that there is a suitable available workforce in the area and that this workforce is expected to grow as a result of household growth in the area. It also concludes that the development is likely to have positive effects on commuting patterns in the area by

		reducing the amount of net outward commuting from Cherwell District. The Applicant has extensive experience of delivering (constructing) and operating major development sites across the UK and Europe. A commitment to an Employment Scheme would apply across both construction and operational phases, and include measures directly focused on "*upskilling and training*", and ensure local benefits from new employment opportunities. The proposals are considered to fully accord with this element of the NPS.
Paragraph 5.244 – 5.246	The NPS requires applications to include an assessment of likely impacts, and sets out (at paragraph 5.245) elements and issues which may feature in the assessment. This includes an expectation of assessments describing the existing socio-economic conditions, and how proposals "*correlate with local planning policies*" (paragraph 5.246).	The ES includes a full assessment of the likely socio-economic impacts, including setting out the existing baseline conditions. The main body of the Planning Statement considers the 'correlation' with local planning policies. The proposals are considered to fully accord with this element of the NPS.
Paragraph 5.247	NPS requires **SRFI** proposals to (emphasis added) "*outline the benefits to workforce conditions of the new development once it is operational. This **should include improved facilities for drivers (including HGVs) such as parking**, hygiene facilities and hospitality establishments*." There is overlap between this element of the NPS and other national (and local) policies regarding both **'transport'** (below) and '**health'** (in Section 4 of the	The proposals include a new HGV parking facility including welfare facilities for drivers accessing the site.

	NPS, above), with other references to the importance of HGV parking.	
Water quality and resources		
Paragraph 5.254	The NPS states: "*Where development is likely to have adverse effects on the water environment, the applicant should undertake an assessment of the existing status and impacts of the proposed project on water quality, water resources and physical characteristics of the water environment as part of the Environmental Statement….. The assessment should also include how this might change due to the impact of climate change on rainfall patterns and consequently water availability across the water environment*".	The effects on water quality and resources is set out in the Environmental Statement Chapter on **Water Environment (Chapter 9, Document 6.9)** with groundwater issues covered in **ES Chapter 11 (**Ground Conditions, **Document 6.11)**. The assessments explicitly take into account the impacts of climate change, with overlap between the Water Environment Chapter and ES **Chapter 15 (Climate Change, Document 6.15).** Water quality issues are also relevant to the assessment set out in ES **Chapter 6 (Document 6.6)** with regards to ecological issues. The Application includes a **Construction Environmental Management Plan (CEMP, Document 6.2C),** which provides a framework for detailed measures to minimise construction effects, including those relating to effects on the water environment during construction. The assessment suggests likely beneficial effects with regard to water quality in several local watercourses in part due to the change from agricultural use. Flood-risk reduction benefits are referred to in the 'flood-risk' section of this schedule.
Paragraph 5.256	*"Under the Environmental Permitting Regulations, applicants are required to manage surface water during construction by treating surface water runoff from exposed topsoil prior to discharging and to limit the discharge of suspended solids. For example, from car parks or other areas of hard standing, during operation."*	

Paragraph 5.258 – 5.259	The NPS sets out a number of issues which should be described in Applicant's assessments – these are: *"• the existing quality of waters affected by the proposed project, and how climate change will impact on this;* *• existing water resources affected by the proposed project, the impacts of the proposed project on water resources, and how climate change will impact on this;* *• existing physical characteristics of the water environment (including quantity and dynamics of flow) affected by the proposed project, and any impact of physical modifications to these characteristics;* *• any impacts of the proposed project on water bodies or protected areas under the Water Framework Directive Regulations and source protection zones around potable groundwater abstractions; and how climate change will impact on this;* *• any cumulative effects."* The NPS also requires assessments to identify "*any protected areas and other water usages within the vicinity of any discharge*", with reference to the Local Nature Recovery Strategy or 'catchment plans'.	**ES Chapter 9 (Document 6.9)** provides a comprehensive assessment of the 'water environment', including regarding current baseline conditions, and likely impacts from the Proposed Development. As above, the **CEMP (Document 6.2C),** provides a framework for detailed measures to minimise construction effects, including those relating to effects on the water environment during construction. The drainage strategy integrates sustainable drainage (SUDS) attenuation features with the wider green infrastructure and landscape strategy ensuring both 'green and blue' infrastructure are provided in a coordinated way. The SUDS features as proposed accord with the technical guidance, with further details of the drainage infrastructure required in due course as plots and buildings are brought forward. This includes direct consideration of measures required to ensure pollution risks are controlled.
Paragraphs 5.260 – 5.264	These paragraphs refer to 'mitigation', and include a number of relevant elements or requirements, including: • Using a construction management plan which may help "*codify*" mitigation; • Adhere to any national standards for Sustainable Drainage Systems (with a cross-reference to national guidance from 2015); • projects should "*identify opportunities and secure measures to protect and improve water quality*	

	and resources through green and blue infrastructure and sustainable drainage"; • design measures to facilitate "*adherence to good pollution control practice*", such as designated areas for storage and unloading.	
Impact on transport networks		
5.269 – 5.270	This section of the NPS focuses both on: - *"the impact of construction on local networks whilst the scheme is being developed* - *the impact of the scheme on wider transport networks once it is operational"* The NPS emphasises Government commitment to 'sustainable travel' "t*hrough facilitating a modal shift to active travel and public transport and reducing transport emissions including through delivering the infrastructure needed to support a transition to alternative fuels including electric vehicles."* (paragraph 5.270). The NPS requires construction traffic effects to be minimised.	Details of likely transport impacts are set out in the **Transport Chapter of Environmental Statement (ES Chapter 3, Document 6.3)**. This includes detailed consideration of new highway works proposed as well as other non-infrastructure related measures relating to travel planning (a **Framework Travel Plan** is submitted as **ES Appendix 3.2, Document 6.3B**). The submitted **Transport Assessment (TA, Document 6.3A**) sets out the impacts of the scheme on the local and strategic road networks during both construction and operational phases. Although the Transport Assessment ensures a worst-case approach by excluding the likely effect of Travel Plan measures in reducing reliance on single-occupancy private cars, the Proposed Development will directly enable and support mode shift to more sustainable means of travel. Mitigation measures are proposed to minimise construction traffic, and the likely effects of the traffic. This includes consideration of HGV Routeing (a strategy is proposed at **ES Appendix 3.1.3, Document 6.3A3**), but is also relevant to other practical and environmental issues such as the need to achieve an earthworks balance across the

		Application Site to reduce the need for construction trips. In addition, a **Construction Environmental Management Plan (CEMP) (Document 6.2C),** is submitted with phase specific CEMPs to be secured via draft DCO Requirement. The Proposed Development includes provision for 25% of parking to be for EV charging as part of a range of measures, both in design and mitigation, to reduce the carbon footprint of the scheme, particularly in terms of building design, energy efficiency and low carbon energy options to reduce and minimise emissions. The **ES Climate Change Chapter (ES Chapter 15, Document 6.15)** and technical appendices, as well as the **Main Site DAD (Document 5.5A)** explain the measures that will be employed.
Paragraphs 5.271 - 5.274	Consultation and engagement by Applicants with relevant highways bodies is required, including the LPA, as well as having regard to relevant policies and plans. The NPS includes a range of generic policy for all NSIPs, including such requirements as minimising construction traffic impacts on local networks, and ensuring the needs of all relevant user groups or types are considered. *'Integrated outcomes'* are encouraged by the NPS, looking across modes, and considering wider accessibility, including vulnerable groups and users.	A Transport Working Group (TWG) was established early in the application process, and has met regularly (monthly) since. The TWG involves the local and strategic highways authorities, and has engaged and advised on the detail of the TA and the methodology, inputs, and responses to the outputs. An extensive **sustainable transport strategy** forms part of the submitted Application (included at **ES Appendix 3.1.1, Document 6.3A1)**. The proposals fully consider the necessary sustainable travel infrastructure and services, and the needs of different user groups. The submitted **Transport Assessment** (TA, **ES Appendix 3.1, Document 6.3A)** sets out the impacts of the scheme on
Paragraph 5.275	In terms of the Applicants assessment, the NPS says:	

	"*For road and rail developments, the applicant's assessment should include an assessment of the transport impacts on other networks as part of the application, based on discussions with the Local Highway Authority/Local Transport Authority/Local Planning Authority*."	the local and strategic road networks, and has been informed by close and ongoing engagement by the TWG.
Paragraph 5.281	Transport mitigation is required to be "*proportionate and reasonable*".	Taken forward in liaison and with regular engagement with the TWG, the package of highways mitigation measures are considered both proportionate and reasonable. They include highways infrastructure, including new walking and cycling infrastructure, and as well as significant investment proposed in public transport related proposals and measures as part of the scheme.
Paragraph 5.283	"*The applicant should provide evidence that the development improves the operation of the network and assists with capacity issues*."	The TA, summarised in the ES Chapter 3, confirms the beneficial impacts on capacity and operation of the network. That includes benefits to both key parts of the strategic road network as well as a range of beneficial environmental effects on other parts of the road network. The latter includes 'reassignment' effects as a consequence of improvements proposed to the Strategic Road Network which sees traffic attracted back to appropriate strategic routes (with environmental and traffic related benefits to more local, and less appropriate routes). This element of the NPS is considered satisfied by the proposals as set out in the assessment of likely 'residual effects' in the ES, and results of the TA.