OXFORDSHIRE STRATEGIC RAILFREIGHT INTERCHANGE

HOST AUTHORITIES (HA)

RESPONSE TO EXAMINING AUTHORITY QUESTIONS 1 (EXQ1)

DEADLINE 2 | 26 OCTOBER 2026

- Oxfordshire County Council
- Cherwell District Council

HOST AUTHORITIES

RESPONSE TO EXAMINNING AUTHORITY QUESTIONS 1 (EXQ1)

The Host Authorities (the "**HA**") are comprised of the following host authorities who are working collaboratively to represent constituents on key issues during this Examination and assist the Examining Authority ("**ExA**") with the Examination's smooth running:

- Cherwell District Council ("CDC")
- Oxfordshire County Council ("OCC")

In these submissions, the Host Authorities may be referred to variously as the HA, the Host Authorities or the Councils.

Purpose of this Submission

The purpose of this submission is to provide answers to ExQ1 published by the ExA on 8th October 2026

AI notice

AI was not used in the production of this response

Response to ExQ1

1	General and cross-topic questions		
ExQ1	Question to	Question	HA Response
Q1.1.1	All I.Ps	**National Planning Policy Framework** All parties are requested to consider the National Planning Policy Framework published on 17 August 2026 and set out if and how any changes in government policy, would affect the consideration of the proposed developments.	This point is considered at section 5.2 of the LIR **[RR-029]**
4.	Compulsory acquisition, temporary possession and other land or rights considerations		
ExQ1	Question to	Question	HA Response
Q1.4.11	All Parties	**New public rights of way (PRoW)** All parties are invited to comment on the applicant's decision to acquire a right over the land rather than the freehold, noting paragraph 12.8 of the Statement of Reasons [APP-143] in respect of dedication agreements.	The County Council considers that only through the acquisition of the freehold for land to be dedicated as new Public Rights of Way (PRoW) can the applicant guarantee the delivery of the PRoW in perpetuity and therefore guarantee that mitigation is secured. Acquisition of the freehold of the land for new PRoW by a single body will help prevent issues with dedication associated with landowner's objecting to the dedication and will also prevent disputes over the maintenance of the PRoW.

			The applicant notes at paragraph 12.2 that they will only be seeking 'temporary possession powers to carry out the necessary work'. Therefore, a key concern regarding maintenance would be how the ability of the LHA to maintain the PRoW will be guaranteed, especially once the temporary possession powers fall away.
5.	The Draft Development Consent Order		
ExQ1	Question to	Question	HA Response
Q1.5.6	The applicant OCC/CDC	**Article 45** Explain the purpose and need for this Article. Does this benefit apply to all land within the Order limits, if so, explain and justify why? With no specific definition of the planning use class for the development contained within the dDCO, explain and justify how this Article would operate in relation to potential permitted development rights? OCC/CDC – Should the dDCO include a provision limiting specific permitted development rights?	Article 45 has the effect of de-designating any established operational land within the order limits as no longer being once the Order is brought into existence. In practical terms, this would remove operational permitted development rights from utility providers thus necessitating the submission of applications to the LPA to undertake both large scale and small scale operational improvements which would otherwise be covered by Parts 13 to 16 of Schedule 2 of The Town and Country Planning (General Permitted Development) (England) Order 2015 Whilst in practice, this article shouldn't present too many challenges, it has the potential to generate significant work-load for the LPA as the Council is required to assess and determine a wide range of work packages including post construction when the facility is operation. To avoid this risk, the LPA would ask for the applicants to review what utilities may be affected and to consider if the wording in the article may benefit from introducing some degree of flexibility to allow a workable balance to be achieved between enabling the efficient

			delivery of utilities serving the wider area between Ardley and Middleton Stoney whilst also not exposing the delivery of the project to unknown or unforeseen risks of significant infrastructure emerging on operational land.
Q1.5.8	The applicant OCC/CDC	**Article 57** As drafted, no provision is made within Article 57 (Certification of plans and documents) for copies of each of the plans and documents listed in Schedule 16 to be included under Part 2 of the local planning register. The ExA notes that such a provision was recently included within the dDCO for East Midlands Gateway Phase 2 (EMG2). The applicant is asked to review the dDCO for EMG2 and consider whether similar wording should be included within the dDCO for the proposed development. If not, please explain and justify why you consider such drafting is not necessary in this case. OCC/CDC are asked to comment as to whether they	Both Councils would support the inclusion of such a provision.

		would welcome the inclusion of such wording.	
Q1.5.10	The applicant OCC/CDC	**Requirement 5** The ExA notes that the wording applied to Northampton Gateway Correction Order [PDA-010], requires the rail infrastructure to be completed prior to the occupation of any warehousing. R5 of the dDCO [APP-139], is structured differently, in that it would allow occupation of warehousing, prior to the delivery of the rail infrastructure. Please explain and justify the approach taken to the drafting of R5. Should the ExA consider that the SoS should be adopting similar wording to that used in the Northampton Gateway Correction Order, provide your position on whether such wording would be acceptable. If not, please explain why. OCC/CDC are invited to comment.	OCC's commentary on Requirement 5 is contained within Annex 3 of the LIR **[REP1-029]**: '*The Councils consider Requirement 5 should be amended as follows – "No more than 232,258 square metres of warehouse (including ancillary office floor space but not including mezzanine floor space) to be provided as part of the authorised development may be occupied until the rail freight terminal which is capable of handling a minimum of four 775 metre trains per day and the associated rail infrastructure required for those purposes has been constructed and is available for use* ***as part of the railway network****".*'

Q1.5.13	OCC CDC	**Requirement 6** Does the LPA and LHA consider the timeframes for the implementation of various strategies required by (3) and (4) to be adequately defined. In relation to 6(6) are the LPA and LHA content with the term 'reasonable endeavours.'? If not, please explain why and provide alternative wording they would wish to see.	The County Council as LHA have reviewed the drafting of Requirement 6 and proposed the following revisions to 6(3) and 6(4): (3) The sustainable transport strategy must be implemented and complied with ~~following~~ on and from the first occupation of any warehouse floorspace on the authorised development. 4) The public transport strategy must be implemented and complied with ~~following~~ on and from the first occupation of any warehouse floorspace on the authorised development. Both the Sustainable Transport Strategy and the Public Transport Strategy were agreed with the applicant through the Transport Working Group. However, these strategies were agreed by OCC on the presumption that they would be implemented from the first day of occupation to ensure that the mitigation they provide is in place prior to any impacts arising. The Council's proposed drafting above would ensure this. In relation to 6(6) it is not clear to the Councils what the applicant proposes to do under requirement 6(6) to ensure the use of Euro VI compliant fleet is maximised. In the first instance, the Councils would suggest the applicant explains its proposals. The Councils can then consider whether they, and the corresponding level of endeavour, are appropriate.
Q1.5.20	OCC/CDC	**Requirement 25** Is the LPA content with proposed working hours as set	For part (1) these suggested hours are different to CDC's published recommended hours for general noisy construction works which are:

		out in (1), (3) and (4)? If not, please explain why and provide an alternative form of wording.	Monday to Friday - 7:30am to 6:00pm Saturday - 8:00am to 12:30pm Sunday - No noisy work Public and Bank Holidays - No noisy work For the piling works (3) and the reprofiling works (4), the LPA would wish to see work start no later than 8:00 but end at the times above and with no working Sundays or Bank Holidays. CDC would prefer to see these used to give local residents respite form noise impacts from the constructions works.
Q1.5.21	OCC/CDC	**Requirement 26** Is the LPA content with the approach set out by the applicant in this requirement? If not, please explain why and provide an alternative form of words.	In part (2) of the requirement, the LPA would wish to see the assessment extend out beyond just reach stackers to include all plant capable of moving goods around the site. To achieve this, it is requested that the words "reach stackers" is replaced by "loading machinery and the items to be moved". This will allow consideration of any noise generated from storage containers for example being dropped from the gantry cranes into place above other storage containers on the land to the north of the site near to Ardley.
6 ExQ1	Design Question to	Question	HA Response
Q1.6.1	The applicant OCC/CDC	**Good Design** The Applicant is directed to the Advice on Good Design	The applicant's approach broadly aligns with the principles of the PINS Good Design Guidance. In urban design terms the site is considerate of the site and context as was set out in **[RR-024]** at section 3.7. The

		published by the Planning Inspectorate and is asked to: a. demonstrate how their design process for the proposed development is robust and aligns with the principles of the PINS advice note b. explain how it would achieve 'Good Design' in accordance with the criteria in section 4 of the NNNPS and the Design Principles for National Infrastructure (National Infrastructure Commission, 2020) c. signpost how 'Good Design' would be implemented through all stages of the development including post-decision and construction, and how the process for achieving good design would be secured in the dDCO OCC/CDC are asked to comment on the applicant's approach towards the design of the proposed development and whether they consider the	'parameter plan' and 'main site design approach document' set out clear design principles and coding that could be secured by condition. However, there seems to be a lack of consistency across the three design approach documents (Main Site, Central Hub and Highways Approach). This creates uncertainty regarding how the various design principles, coding requirements and approaches relate to one another and how they will be embedded in future design stages. The approach to the Central Hub is a particular weakness. Whilst the documents include restoration proposals for the threshing barn and wider farm complex, there is a non-committal approach to potential uses. This limits confidence that the hub will deliver the social and place-making benefits that its location and heritage significance could support. The ExA will also note the comments contained with the LIR **[REP1-029]** at section 8.5 in relation to Landscape and Visual Impacts. Paragraph 8.5.76 to 8.5.88 of the LIR discuss the Council's concerns around how the design of the development has failed to adequately address the context and character of the site. The guidance outlines that good design outcomes involve responding positively to place and ensuring that the development results in positive effects to the character of a place. Landscape Character is a significant factor in understanding the identity of a place and the

		applicant's approach aligns with PINS guidance.	Councils contend that the approach to the design of the project has not responded positively to the landscape character of the area.
8	Geology and ground conditions		
ExQ1	Question to	Question	HA Response
Q1.8.10	OCC	**Clarification: ES Table 11.3** In ES Table 11.3 [APP-179] OCC says that mitigation is inadequate and is currently considered contrary to NNNPS paragraph 5.916. Should this be a reference to NNNPS paragraph 5.196?	The information from ES table 11.3 **[APP-179]** was taken from OCC's Statutory Consultation Response. There was a typographic error in this response and the reference to '5.916' should read '5.196' The correct reference is provided in the same context at paragraph 102 of OCC's Relevant Representation **[RR-109]**
Q1.8.15	The applicant OCC	**Loss of mineral resource** In Table 11.3 of ES chapter 11 [APP-179] OCC disagrees with the applicant's estimate of loss of mineral resource due to the proposed development. The parties are invited to comment and give an update on the current position and its relevance to the examination.	OCC maintain their request for further information on the evidence, calculations and assumptions utilised by the applicant to demonstrate 2.8t/m3 presumed bulk density. This bulk density figure is used for calculating the tonnage sterilised by the development. The Council also requests details of the buffers applied around the water courses and other sensitive uses, which has reduced the proposal from 200ha to 140ha. This information would enable a full understanding of how the applicant has concluded that the site contains 27 million tonnes of limestone and enable full assessment of the proposal to be undertaken. This point is considered in more depth within the Local Impact Report **[REP1-029]** paras 8.9.21 and 8.9.22
10	Historic Environment		
ExQ1	Question to	Question	HA Response

Q1.10.6	The applicant OCC	**Archaeology – unsurveyed areas** For those parts of the site which could not be evaluated during the pre-application stage due to ecological constraints, what confidence can the applicant provide that the archaeological significance of those areas is adequately understood, and how would any unexpected discoveries be managed through the mitigation strategy? Is the applicant's approach acceptable to OCC?	The submitted Archaeological Mitigation Strategy **[PDA-005]** has been agreed with Oxfordshire County Archaeological Service. This Strategy outlines the methodology for the proposed trenching, and for any resulting mitigation. Once the trenching is complete, a summary of the results will be produced to allow discussions for further mitigation to take place. The geophysical survey recorded one linear anomaly within the area, and the Oxfordshire HER records the location of a possible cemetery in this area, identified during previous work laying a pipeline. The previous survey and archaeological investigation in the area has meant the Council has a reasonable understanding of the area which still requires trenching. The AMS includes 'In the unlikely event that highly significant remains are identified, there may be a requirement for preservation-in-situ.' (**[PDA-005]** para. 2.2 EA 12). The Council are confident that any remains will be able to be subject to mitigation excavation, however, an area of greenspace is proposed in the location of the trenching and so it will likely be possible to preserve significant remains in situ. Should mitigation excavation be required in the area, the excavation methodology outlined in **[APP-283**] would also apply to this area, with the limits of excavation agreed with the applicant following the production of the results from the trenching.

			The applicant's approach is acceptable.
11	Landscape and visual, including lighting		
ExQ1	Question to	Question	HA Response
Q1.11.10	The applicant OCC/CDC	**Schedule of planting** Paragraph 7.6.7 of ES chapter 7 [APP-175] states that an indicative and outline schedule of planting mixes and species is provided in ES Appendix 7.6 [APP-251] and is intended to form the basis for the subsequent preparation of detailed landscape and habitat proposals in consultation with ecological specialists and other relevant parties. Can the applicant clarify: a. to what extent the planting mixes and species identified in ES Appendix 7.6 are secured through the application proposals and associated control documents? b. whether the detailed landscape and habitat proposals must accord with, or be substantially based upon, the planting schedules set out in Appendix 7.6 and, if	The Councils questioned the appropriateness, the lack of detail and the successful establishment of the proposed planting on bunds at ISH2 and in para 8.5.77 and paras 8.5.88 to 8.5.96 of the LIR **[REP1-029]**. The Councils have concerns about the lack of differentiation in the planting to reflect the local landscape character context and ensure receptor specific mitigation. The Councils also voiced their concerns about whether the planting and its establishment are currently adequately secured. The Councils welcome the questions asked by the ExA and will review and respond to the answer provided by the applicant to this question. The Councils are not satisfied that the indicative planting schedules in ES Appendix 7.6 **[APP-251]**, together with the proposed control documents, provide sufficient certainty that the landscape and visual mitigation relied upon in the LVIA will be delivered and successfully established. As explained in paragraphs 8.5.69–8.5.74 of the LIR **[REP1-029]**, the Parameter Plan **[AS-008]** identifies the strategic bunding but does not identify the associated planting, notwithstanding its importance to the mitigation strategy. Requirement 11 refers to the Parameter Plan, HMMP and Design Approach Document, but these do not collectively establish sufficiently detailed and enforceable requirements for the location, composition and performance of the proposed planting.

		so, where this is secured? c. given that the planting schedules are described as indicative and outline, what confidence can be placed on the landscape, visual and ecological benefits attributed to them in the assessment, and how are those benefits secured through the DCO? Are OCC/CDC content with this approach? If not, please explain and justify why not.	The Councils are particularly concerned about planting on engineered bunds, as explained in paragraphs 8.5.88–8.5.96 of the LIR **[REP1-029]**. The effectiveness of this planting depends upon appropriate species selection, soil conditions, drainage, establishment and long-term management. These matters are especially important given the reliance placed on effective screening by Year 15. The Councils therefore consider that the applicant should demonstrate how the planting relied upon in the LVIA will be secured through the DCO, including its location, species composition, density, establishment requirements, management and replacement provisions. The relevant requirements should provide sufficient certainty that the mitigation assumptions underpinning the assessment can reasonably be achieved. Pending this clarification, the Councils cannot be satisfied that the anticipated landscape and visual mitigation benefits will be delivered. The Councils also wish to reiterate a concern raised at the Issue Specific Hearing regarding the potential adverse landscape and visual effects arising from unsuccessful planting establishment. The LVIA relies upon the successful establishment and growth of substantial areas of woodland and structural planting to reduce adverse landscape and visual effects over time, particularly by Year 15. However, the failure or partial failure of planting represents a foreseeable alternative scenario which could result not only in the loss

			of anticipated mitigation benefits, but also in additional adverse effects upon landscape character and visual amenity. Experience from other major infrastructure projects demonstrates that extensive planting schemes can experience significant establishment difficulties, particularly where planting is undertaken on engineered landforms or in exposed locations. Climate change, including increasingly frequent periods of drought, extreme temperatures and intense rainfall, presents additional risks to the long-term success of such planting. The Councils therefore consider that the applicant should demonstrate that the landscape design has been informed by appropriate climate resilience principles, including species selection, soil depths and specifications, soil moisture retention, drainage, planting densities, establishment maintenance and long-term management. These matters should be addressed through clear and enforceable design principles, rather than deferred entirely to detailed landscape proposals following consent. The Councils also consider that the applicant should address the consequences of unsuccessful or partially successful planting establishment as a reasonable adverse scenario, particularly where the LVIA relies upon substantial screening benefits by Year 15.

			This should include consideration of the potential landscape and visual effects of exposed bunds, unsuccessful woodland establishment and the consequent continued visibility of the proposed buildings and infrastructure. Without adequate design safeguards and an appropriate assessment of these risks, the Councils cannot be confident that the predicted residual landscape and visual effects will be achieved.
Q1.11.14	OCC/CDC	**Use of maximum parameters** The ExA notes that paragraph 7.2.32 of ES chapter 7 [APP-175] states that the LVIA is based upon the 'worst case' or 'maximum parameters', as defined for the proposed development. Are the local authorities content that this is the case? If not, please explain why not.	The Councils are not satisfied that it has been adequately demonstrated that the LVIA consistently assesses the reasonable worst-case development that could be delivered under the DCO. The applicant states in ES chapter 2: Description of Development and Alternatives **[APP-170],** table 2.1, row 2.3.9-2.3.11: A reasonable worst-case scenario has been applied to inform the assessment of effects within the ES – in most cases this assumes the maximum parameters, even where this is not likely (such as max. building heights at every building across every zone of the site. However, the Councils have identified uncertainty regarding the relationship between those parameters, the development assessed and the supporting visualisations. As explained in paragraph 8.5.61 of the LIR **[REP1-029]**, the photomontages are based upon the Illustrative Masterplan rather than the Parameter Plan that would be secured through the DCO. Furthermore, the Parameter Plan retains substantial flexibility regarding the footprint, massing and disposition of individual

			buildings, as explained in paragraph 8.5.68 of the LIR **[REP1-029]**. It also provides for less extensive green infrastructure between buildings than is shown on the Illustrative Masterplan (paragraph 8.5.69). Consequently, the Illustrative Masterplan may present a less visually intrusive development arrangement than could ultimately be delivered under the DCO. The Councils therefore request that the applicant demonstrates, through a clear audit trail between the Parameter Plan, the LVIA assessments and supporting visualisations, that the reasonable worst-case development has been assessed for each materially affected landscape and visual receptor. Where the visualisations do not demonstrate the maximum permissible development envelope, supplementary wirelines or other appropriate visualisations should be provided. Until this information is available, the Councils cannot confirm that the LVIA adequately demonstrates the maximum adverse landscape and visual effects of the development permitted by the DCO. As raised by the Councils at ISH2 (Session 3), the LVIA should address the potential adverse landscape and visual effects arising from unsuccessful establishment of mitigation-critical planting, particularly on engineered bunds. This represents a foreseeable adverse scenario that should inform the assessment of residual effects. The Councils also consider that sufficiently robust, climate-resilient design

			principles should be secured to minimise the risk of planting failure and ensure that the mitigation relied upon in the LVIA is deliverable. Please see also response to Q1.11.15 below.
Q1.11.15	The applicant OCC/CDC	**Photomontages** Do the submitted photomontages represent the maximum development parameters that could be delivered under the DCO? If not, please explain and justify why not. Are CDC and ODC satisfied that the photomontages accurately represent the proposed development. If not, why not?	As outlined in Oxfordshire County Council's Relevant Representation **[RR-109]** and in para 8.5.61 of the LIR **[REP1-029],** the councils are concerned that the visualisations might not provide an accurate representation of the potential maximum impact of the development, as they are based on the Illustrative Masterplan rather than the Parameter Plan. The Illustrative Masterplan shows an example of how the site could be developed if approved, however, it is the Parameter Plan that would be approved as part of the DCO application. The Parameter Plan outlines the development parameters (including height), highway works, bunding and main green infrastructure links but does not indicate planting on the bunds, nor does it include some of the green infrastructure links between the building blocks shown on the Illustrative Masterplan and in the photomontages. In theory, buildings could occupy the entire, yellow-shaded areas indicated on the Parameter Plan. As such the warehousing could occupy an even larger footprint of the site and be less broken-up in views than currently shown on the Illustrative Masterplan and in the photomontages. The applicant's LVIA **[APP-175]** states in paras. 7.5.106 & 7.5.107 that the photomontages depict the maximum heights but that the detailed design and elevational treatments are illustrative only.

			Buildings might therefore comprise different materials and colours, and might include logos and lettering at a high level that would be visible in views, potentially increasing impacts. The photomontages show one development scenario but don't represent the potential worst-case scenario. Photomontages have also only been provided in relation to the warehousing on the main site and not for any of the other elements of the scheme, i.e. the highway works and the rail sidings despite these comprising large impactful developments in their own right. This is an omission. The councils have requested further visualisations to better understand the impact of some of the other scheme elements. It is understood that these might be provided at DL2. The councils will review and respond to this information once received. The Councils therefore consider that the applicant should provide supplementary visualisations demonstrating the reasonable worst-case development permitted by the Parameter Plan, including the maximum building envelope, associated earthworks, infrastructure and mitigation. These should be accompanied by sufficient information to distinguish between elements secured through the DCO and those shown for illustrative purposes only. The Councils will review any additional visualisations submitted at Deadline 2 before reaching a final position on their adequacy. Wirelines should be shown on the existing view and not on the photomontage view in order to understand magnitude of change.

12	Material and Waste		
ExQ1	Question to	Question	HA Response
Q1.12.5	The applicant OCC EA	**Ashgrove Farm in-vessel composting (IVC) facility currently operated by Biffa** We note from the OCC relevant representation [RR-109] Annex 1 paragraphs 113 to 117 and from ES Tables 13.2 and 13.3 [APP-181] that i) removal of the Ashgrove Farm IVC facility currently operated by Biffa would create a potential conflict with the Oxfordshire Minerals and Waste Local Plan policy W11; ii) a full Waste Needs Assessment needs to be prepared (OCC RR Annex 1 paragraph 114) and iii) there is a "lack of clarity regarding the fate of the Biffa Green Power IVC facility …" (ES Table 13.3, ID EA28). Noting your responses in ES Tables 13.2 and 13.3, in ES paragraphs 13.4.23 to 13.4.32	OCC support the request from the Inspector for the applicant to explain their assessment of future need in more detail and how their approach would ensure that the shortfall created by removal of this facility would be made up, with particular reference to OCC policies W1 and W11, and consider the current and future waste needs of neighbouring authorities as set out in the **[REP1-029]** 8.11.14 - 8.11.28. This would enable full assessment of the proposal and its accordance with Development Plan Policy. The Council will therefore review the applicant's answer to this question and provide commentary at Deadline 3.

		and at procedural deadline A, please explain your assessment of future need in more detail and how your approach would ensure that the shortfall created by removal of this facility would be made up, with particular reference to OCC policies W1 and W11, the current and future waste needs of neighbouring authorities and any changes needed to the current Biffa licence. OCC and the Environment Agency (EA) are invited to comment.	
13	Need, location and delivery		
ExQ1	Question to	Question	HA Response
Q1.13.13	The applicant OCC/CDC	**Delivery of warehousing** Paragraph 4.88 of the NNNPS recognises that some warehousing may need to precede final rail commissioning but requires rail connections to come forward in a timely manner. Explain and justify how the applicant	This point is considered at paragraphs 7.1.69 to 7.1.78 of the Local Impact Report **[REP1-029]**. It should be noted that in the LIR the SoCG between the applicant and NR is incorrectly referenced as **[AS-087]** when it is instead **[AS-092].** The Councils' argument is that the Statement of Common Ground between the applicant and Network Rail **[AS-092]** does not provide evidence demonstrating agreement with Network Rail regarding the planned timeframe and delivery of the rail network connection as the

		considers that allowing approximately 232,258 sq m of occupied warehousing before rail operation satisfies that test? OCC/CDC – Do you consider that the approach of the applicant meets the test set out in the NNNPS? If not, please explain and justify and outline what changes would be required to satisfy the test.	statement in the SoCG does not provide any certainty of a date by which the rail connection will be made. Paragraph 7.5 of **[AS-092]** outlines that it is not possible to make the rail connection within 3 years of consent. This is not the same as an agreement on the timescale for delivery of the connection as there is no definitive future date when the connection will be made. As it stands the connection could be made in 100 years' time and still be in accordance with the agreement between the applicant and NR at para 7.5 of **[AS-092].** This is clearly not in accordance with the intention of paragraph 4.88 which is to ensure that the rail connections are delivered in a '*timely manner*' to ensure that SRFI's provide the benefit of transferring freight from road to rail. In order to consider the proposed development compliant with para 4.88 of the NPS a revised SoCG between the applicant and NR would need to be submitted which includes a commitment to deliver the works within a certain timeframe. The Councils acknowledge that there are factors beyond the applicant and NR's control and as such can accept a conservative estimate for the proposed timeframe. However, the timescale does need to be in the short to mid term to ensure there is not a scenario in which the development is operational for a long period of time without the benefit of modal shift.

			Compliance with paragraph 4.88 is reliant on the wording of Requirement 5. Commentary on Requirement 5 can be found at Annex 3 of the LIR **[REP1-029]** and in response to Q1.5.10 above. It is understood from engagement with the applicant that additional evidence may be submitted at DL2 on this matter which will provide greater evidence of agreement on an indicative timeline for delivery of the rail works. The Councils would welcome this submission and will update the ExA on their position regarding paragraph 4.88 of the NNNPS following this submission by the applicant.
14	Noise and vibration		
ExQ1	Question to	Question	HA Response
Q1.14.3	The applicant CDC / OCC	**Justification for the proposed construction operation times** Paragraph 5.5.15 of ES chapter 5 Noise and Vibration [APP-173] states that "construction working hours are to be controlled through the DCO requirements which are set to the following timings (unless otherwise agreed in writing by the local planning authority): 07:00 – 19:00 hours weekdays; 07:00 – 16:00 hours Saturdays; and no works on Sundays or	Please see the response to Q1.5.20 above

		public holidays, unless in exceptional circumstances only and with prior notification to the local planning authority (LPA)." Could the applicant clarify whether the proposed working hours encompass site set-up and close-down activities and explain the rationale for requiring these extended hours? Could CDC / OCC confirm whether the proposed working hours are acceptable?	
17	Traffic and transport		
ExQ1	Question to	Question	HA Response
Q1.17.9	The applicant OCC	**Traffic assessment method and associated traffic monitoring for the A43 Barleymow roundabout** It is mentioned in paragraph 11.138 of ES Appendix 3.1 Transport Assessment - part 1 of 11 [AS-055] that "it has been agreed with National Highways and OCC that due to the uncertainty around the traffic forecasts at the junction, the cost of the works would be	It is OCC's understanding that this matter is still under negotiation between the applicant and National Highways. The Barleymow Roundabout, forming the junction of the A43 and the A421, is part of the Strategic Road Network, and is within West Northamptonshire, and therefore not within the local highway area of OCC as Local Highway Authority. OCC recognises that the highway works proposed by the applicant on the A43 within Oxfordshire will release capacity that is likely to lead to increased congestion upstream on the A43 at the Barleymow Roundabout. However, it is for NH to agree on the required mitigation and the circumstances in which it will be triggered. It is understood from paragraph 2.5 and 2.6 of National Highways' Written Representation **[REP1-022]** that a DCO obligation is being

		secured by OCC on behalf of National Highways via a S.106 contribution to be made by the applicant. The scheme would be implemented should pre-agreed traffic growth thresholds be reached. The exact mechanism for the monitor and manage arrangement will be agreed with National Highways." Could the applicant clarify the pre-agreed traffic growth thresholds that would trigger the implementation of these works, and explain how compliance with this threshold would be monitored? Could the applicant also confirm whether OCC would undertake these works, funded by the applicant through a Section 106 agreement? Could OCC to confirm if it is happy with this approach?	negotiated which would directly fund NH to undertake works to Barley Mow Roundabout and which would set out the proposed 'monitor and manage' arrangement. The Council is supportive of this approach to securing the mitigation. However, should NH and the applicant not reach agreement with National Highways on the drafting of the DCO obligation and therefore a S106 contribution be required instead, OCC would merely be a conduit through which a contribution could be made via the S106 agreement, and OCC would enter into a separate agreement to pass any contribution received for Barleymow Roundabout on to NH. Monitoring the arrangement will be the responsibility of NH. OCC recognise that compliance with monitoring arrangements for this location may not be possible for OCC to enforce, since it is without Oxfordshire, and therefore the monitoring arrangements would need to be part of a separate agreement or within the DCO itself. OCC would not carry out the works, because the location is on the SRN and also not within Oxfordshire. It is assumed that NH would carry out the works.
Q1.17.10	The applicant OCC/ CDC	**Proposed Albion Land and Tritax Big Box improvement schemes for Baynard's Green junction**	The proposed Albion Land and Tritax Big Box logistics developments, comprising three development sites, are at appeal, with a co-joined Inquiry for the three currently underway. Unless and until any one of

		It is stated in paragraph 2.53 of Appendix 1 of ES Appendix 3.1 Transport Assessment - part 1 of 11 [AS-055] that "the Albion Land and Tritax Big Box schemes were required to improve the A43 Baynard's Green Roundabout. The improvement scheme included staggered Toucan crossings on the B4100 east and west and A43 south arms of the junction and new shared use footway/cycleway links, including a link to the Baynard's Green services. The schemes were also required to provide a footway/cycleway alongside the B4100 between Bicester and their sites, which would have connected with the new facilities provided at the Baynard's Green junction. However, following the refusal of these schemes, these works are not committed." Could the applicant confirm whether this scheme has been, or is	the three sites is granted permission, their required highway works cannot be considered committed. The highway works required to make the Albion and Tritax schemes acceptable, either individually or together, comprise a) an improvement scheme for Baynards Green roundabout incorporating full signalisation with pedestrian and cycle crossing facilities on the B4100 arms and the A43 south arm and b) a footway/cycleway between the sites and Braeburn Avenue, Bicester alongside the B4100. The OxSRFI proposed improvements also incorporate an improvement scheme for Baynards Green roundabout incorporating full signalisation with pedestrian and cycle crossing facilities on the B4100 arms and the A43 south arm, though the scheme is larger and provides more vehicle capacity than the Albion/Tritax scheme. An option is also proposed which would be implemented by OxSRFI in the event that the Albion/Tritax scheme had already been delivered. This option is an enlargement of the Albion/Tritax scheme which minimises abortive works and builds on that scheme rather than requiring it to be removed and replaced. Requirement 8(3) to 8(5) of the dDCO **[REP1-003]** secures this flexibility, The OxSRFI proposed improvements do not include the footway/cycleway between Baynards Green and Bicester (referred to at b) above), because they would not be required for the OxSRFI development.

		intended to be, incorporated into the proposed improvements at this junction? Could OCC and/or CDC provide an update of the current position regarding the proposed Albion Land and Tritax Big Box improvement schemes.	
Q1.17.11	The applicant OCC / CDC	**Management of the proposed bus contribution** Paragraph 4.76 of Appendix 1 of ES Appendix 3.1 Transport Assessment - part 1 of 11 [AS-055] states that "to manage the implementation of the PTS, including the control of the expenditure on the Bus Service Contribution, a Sustainable Transport Working Group (STWG) for the OxSRFI development will be established. This approach has been adopted successfully at other SRFIs. The STWG would include representatives from various stakeholders, though voting rights would be restricted to key stakeholders (likely to be	The involvement of the STWG is required to ensure that the bus service meets the needs of the development by providing input into the specification of services and the management of contracts. This could include decisions around timetabling and the phasing of incremental service improvements, such as the addition of the service to Banbury or introduction of particular evening or Sunday journeys in line with new shift patterns. Whilst the OCC Public Transport Team will provide the technical support for these processes, it is important to use the STWG as a 'sounding board' for decision-making and ensure that the funding is utilised for the maximum benefit possible. Bus contributions will be made to OCC as the local transport authority and will be paid by them to the operators of the services procured as a result of the contribution. OCC will make the final decision on the use of the funding but will be guided by discussions at the STWG. This will increase transparency and accountability and ensure that local stakeholders can feed into the process at the appropriate time.

		OCC, CDC, and the applicant). The STWG could also include the Site Travel Plan Co-ordinator, Unit Travel Plan Co-ordinators." Given that this bus contribution would ordinarily be secured through a Section 106 agreement with CDC, the applicant, OCC and CDC are invited to explain why the process could not be managed by the Council's Sustainable Transport Team and Section 106 monitoring officer.	
Q1.17.17	The applicant OCC/ CDC	**HGV routeing strategy and related enforcement actions** Could the applicant explain how the proposed HGV routeing strategy would be monitored and enforced, including details of any physical measures and the use of Automatic Number Plate Recognition (ANPR) technology, considering concerns raised in relevant representation (RR046) regarding existing highway constraints within Clifton,	OCC refers the Examining Authority to Annex 1 of its Local Impact Report, specifically its comments on the updated HGV Routing Strategy **[APP-193].** OCC has reviewed the revised strategy and is satisfied that it reflects the approach agreed through the Transport Working Group, including the proposed ANPR monitoring arrangements and environmental weight restrictions. OCC raises no objection to the revised strategy. The proposed ANPR arrangements will be privately managed and enforced, while enforcement of the environmental weight restrictions will remain with OCC through its existing enforcement powers.

		Fritwell and Somerton? Referring to the discussions held during ISH2 on 30 September 2026, could the Applicant confirm whether the proposed HGV routeing arrangements, including any penalties or enforcement measures for non-compliance, will be secured through contractual agreements with HGV operators? If so, could the Applicant explain how compliance with those arrangements would be monitored and enforced? Have CDC and OCC any comments?	OCC would, however, welcome clarification from the applicant on whether contractual agreements with HGV operators could be introduced to reinforce compliance with the agreed routing arrangements, including how any non-compliance would be addressed. OCC also notes the existing 7.5-Tonne weight restriction at Clifton Bridge on the B4031and considers that this existing restriction should continue to be observed as part of the proposed HGV routing arrangements. OCC will review the applicant's response to Q1.17.17 and provide further comments if necessary at Deadline 3.
18	Water Environment		
ExQ1	Question to	Question	HA Response
Q1.18.2	The applicant CDC / OCC	**Water storage** Paragraph 3.21 of ES Appendix 9.4 (Sustainable Drainage Statement - Offsite and Highways) [APP-266] identifies a range of proposed sustainable drainage measures. Could the applicant explain why rainwater harvesting and water reuse	This matter would fall to the Highways Drainage Engineers at OCC in its capacity as Highway Authority. Both the LLFA and Highways Drainage Engineers will review the applicant's response to this question and comment if required.

		systems have not been included within the proposed drainage strategy, particularly considering the concerns raised in relevant representation (RR-009)? Has the LLFA any comments on this issue?	
Q1.18.3	The applicant CDC / OCC	**DCO requirements and flood risk assessment** Could the applicant explain whether, and if so how, it has addressed the concerns with the dDCO requirements and flood risk assessment, including matters relating to hydraulic modelling, floodplain compensation, culvert design, watercourse diversions and compliance with the Water Framework Directive? The applicant should also outline the proposed mitigation and management measures for watercourses, aquatic ecology and in-channel works. In responding, the applicant should have regard to the	OCC's Relevant Representation **[RR-109]** paragraph 177 and 178 refer to matters related to modelling of ordinary watercourses. As noted, the EA have undertaken a review of the hydraulic modelling and provided comments on requirements for further modelling. The Council's will review the applicant's answer to this question and, if required, provide further commentary at Deadline 3.

		concerns raised in Relevant Representation (RR-042). Has the LLFA any comments on this issue?	
Q1.18.4	The applicant CDC / OCC	**Assessment of water quality and maintenance of Sustainable Drainage Systems** Could the applicant explain how operational water quality impacts, the long-term maintenance and management of the proposed SuDS, drainage control measures, and any pollution risks associated with the proposed solar photovoltaic (PV) infrastructure have been assessed and addressed? In doing so, the applicant should have regard to the concerns raised in Relevant Representation (RR-042). Has the LLFA any comments on this issue?	OCC as LLFA do not provide comments in relation to water quality. That would be a matter for the relevant authority. Any SuDS proposals would need to meet the National Standards and any local issues/concerns raised by the EA in relation to pollution of a principal Aquifer or other sensitive area. The Council's will review the applicant's answer to this question and, if required, provide further commentary at Deadline 3.
Q1.18.5	The applicant CDC / OCC	**Management of surface water runoff within the development site** It is stated in paragraph 4.22 of ES Appendix 9.2 FRA [AS-076]	See comment in relation to Q1.18.4 in respect of LLFA remit which does not extend to groundwater flooding or water contamination. Any proposals for environmental permitting would need to be dealt with by the applicant in accordance with the EA requirements.

		that "there is potential for shallow groundwater to be present within the site. Should groundwater be encountered during construction a specialist should be consulted and appropriate dewatering undertaken as necessary. It is considered that the raised development plateaus, finished floor levels and profiling of ground levels will provide mitigation for any potential groundwater flooding post-development." Could the applicant explain any proposed methods for groundwater protection, contamination risks, dewatering, monitoring, remediation and the interface between contaminated land management and environmental permitting? Has the LLFA any comments on this issue?	The Council's will review the applicant's answer to this question and, if required, provide further commentary at Deadline 3.
Q1.18.6	The applicant CDC / OCC	**Padbury Brook culvert maintenance and blockage prevention arrangements**	Please see OCC's RR **[RR-109]** in relation to the Council's role in maintenance on ordinary watercourses and the regulation of these. Maintenance of watercourses sits with riparian owners which is

		Paragraph 6.12 of Appendix 1 (Padbury Brook Hydraulic Modelling Report) of ES Appendix 9.2 FRA [AS-076] states that "in line with the above, a 50% blockage has been applied to the twin 1.5m diameter culvert. In the blockage scenario, the flood levels upstream of the culvert are predicted to increase by up to 40mm. During this scenario, flood extents are predicted to remain in channel. It is therefore expected that blockage of the culvert will not significantly affect flood levels and extents within the Order Limits; however, it is recommended that the proposed culvert should be regularly maintained to ensure it remains free of blockages." Could the applicant explain what measures would be put in place to ensure the proposed Padbury Brook culvert is regularly maintained and kept	normally the landowner. Areas within a development site could be secured by the applicant as noted in the ES Chapter 9 Water Environment **[APP-177]** para 9.5.28 '*To ensure the long-term performance of the watercourse and culverts, operational and maintenance procedures would be prepared to set out routine inspection, maintenance, and remedial actions in line with land owner riparian responsibilities.*' Outside of the site maintenance of ordinary watercourses sit with the riparian owner (landowner) and would fall under the Land Drainage Act 1991. As stated, OCC as the LLFA only have a permissive power to undertake enforcement in relation to maintenance of the channel on ordinary watercourses. The Council has no responsibility to and does not maintain watercourses. The Council's will review the applicant's answer to this question and, if required, provide further commentary at Deadline 3.

		free from blockages and how these would be secured? Has the LLFA any comments on this issue?	
Q1.18.7	The applicant CDC / OCC	**Design of the drainage systems** Could the applicant explain how the drainage design would meet the criteria set out in the Oxfordshire Standards, particularly considering the CDC's Relevant Representation (RR-024). Has the LLFA any comments on this issue?	The LLFAs comments on this matter are found in the LIR **[REP1-029]** at paragraphs 8.7.20 to 8.7.23. To summarise the Council believes that further security needs to be provided to ensure that at detailed design stage the Council is provided with sufficient detail to ensure the scheme is compliant with the Local Standards. The Council's suggestion at paragraph 8.7.23 of the LIR **[REP1-029]** is that Requirement 21 is redrafted to be in line with the standard detailed drainage condition within Oxfordshire's Local Standards. The Council's will review the applicant's answer to this question and, if required, provide further commentary at Deadline 3.