

Date: 28th June 2021

LETTER FROM MIDDLETON STONEY PARISH COUNCIL

TO: The Planning Inspectorate (OxfordshireSRFI@planninginspectorate.gov.uk)

REF: TR050008 (Application by Oxfordshire Railfreight Limited)

- Comments on the Environmental Statement Scoping Report submitted by OxSRFI for the proposed strategic rail freight interchange (SRFI) at Ardley: Key comments and requested areas for focus of Environment Statement.
 - **From:** Middleton Stoney Parish Council (MSPC).
 - **Key contacts:** Rachel Makari and Jonathan Rees (middletonstoneypc@gmail.com).
 - **About:** Please find below a summary of our comments, which are in addition to a more comprehensive and detailed summary of points, included as an Appendix at the end of this document.
 - **Next steps:** Please respond to confirm receipt of this document by reply. We ask you to keep Middleton Stoney Parish Council closely informed of all developments directly (middletonstoneypc@gmail.com). We also request that a meeting is arranged at your earliest convenience so that a good working relationship can be established from here, and our views heard, considered and incorporated.
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SUMMARY: We are saddened and disappointed that this proposal has been made and feel that it is significantly out of keeping with this predominantly rural area of North Oxfordshire. Yet again, it feels as if a money making opportunity for a small number of people is being prioritised before the quality of life of the vast majority, and at the expense of the communities and families that live near the proposed site.

We ask you to consider how you would feel if this was proposed in your local area, amongst your local community, and kindly request that you work to factor in as many amelioration measures for our community as possible to lessen the negative impact on our lives and those of our immediate neighbours. Thank you.

We will engage constructively with you to try and secure the best possible outcome for our community in the eventuality that the plan does get approval.

Please see below a summary of our key comments, as well as – in the Appendix – our full comments on the Environmental Statement Scoping Report.

KEY REQUEST: We request that your Environment Statement should take account of:

1. **Rationale:** we are concerned that the environmental impact assessment should set out more clearly the rationale for the proposal. We are very struck by the relatively few train deliveries envisaged for the size of operation. It is difficult to avoid the conclusion that this is simply a cover to build a new warehouse development on a greenfield site outside the local development plan. In particular the proposal's

instigators need to set out more clearly how they propose to generate rail freight traffic given the small capacity of the Chiltern line, and its location. We also think there needs to be a decommissioning plan included in the EIA.

2. **Traffic** – there is a widely accepted / acknowledged problem regarding the unsatisfactory traffic situation in the village of Middleton Stoney, particularly in relation to excessive heavy goods vehicle (HGV) movements, at the crossroads / intersection of the B4030 / B430 roads.

The Environmental Statement should therefore ensure that this specific issue is very carefully examined. Crucially, this comment applies to both the construction phase and subsequent operation of the site once built. The proposal for a relief road to divert all traffic away from Middleton Stoney could be welcomed but needs a lot more development than is currently envisaged. In particular the problem that it would deliver large numbers of HGVs on to a country lane to Bicester, which would be unacceptable.

We encourage you to engage with our community in more detail regarding this.

3. **Light pollution** which would be created by this development is a particular concern. We note that this will be explored in the Environmental Statement, but we would encourage this to be done in a high level of detail, and in consultation with the local community.
4. **Noise pollution** which would be created by this development is a particular concern. We note that this will be explored in the Environmental Statement, but we would encourage this to be done in a high level of detail, and in consultation with the local community.
5. **Flooding** – and the worsening of surface water flooding issues in the local area which would result from this development is a particular concern. We note that this will be explored in the Environmental Statement, but we would encourage this to be done in a high level of detail, and in consultation with the local community.
6. **Destruction of countryside** – The destruction of open fields, agricultural land and open countryside, which are integral to the character of this area of the country is another key concern. We note that this will be explored in the Environmental Statement, but we would encourage this to be done in a high level of detail, and in consultation with the local community.
7. **Destruction of valuable ecology** – this area of Oxfordshire provides habitats for a range of rare and protected species, including but not limited to bats, great crested newts, badgers, a variety of rare bird species, Roman Snails, otters, water voles, freshwater invertebrates. It is therefore vital that the ES considers the likely significant impact on such ecology.

Ref.	Topic	Comment
2.5	Glossary	The ES should include a comprehensive glossary including an explanation of every acronym used in the text.
3.24	Description of development	The document should clarify whether the SRFI may play any role in manufacturing or assembly of the goods while they are held on site – in other words if there may be any element of industry on the site, and whether this could involve additional Use Classes.
3.3		As the proposed SRFI is understood not to have any specific users at this stage, the ES should provide evidence of market demand for the scale of facility that is proposed in this location.
4.11, 4.12	Scope and structure of document: Alternatives	<p>It is stated that few alternative sites exist which would meet the criteria. The Report should elaborate on this statement and identify the alternative sites that have been considered, and compare and contrast them with the Application Site.</p> <p>Alternatives need also to be placed in the wider context of where other SRFIs are located or planned in the wider region. An explanation of why an additional SRFI is required in this location should be included, to rule out any concerns of commercial opportunism.</p> <p>The proposed site is within 40 miles of a similar development at Daventry. The ES should explain why there is a perceived need to develop a similar site so close to an existing facility.</p>
4.23	SRFIs and Climate Change	<p>It is stated that SRFIs play a positive role in Climate Change policy by shifting freight from road to rail. The ES should provide evidence that existing SRFIs have indeed played such a role, by examining available data on the success or otherwise of this strategy nationally. If not proven, there has to be serious doubt over whether this Application would indeed play such a positive role in Climate Change.</p> <p>In providing this detail, the opportunity should be taken to explain to consultees how the freight transfer process works, as this is not clear from any readily available information.</p> <ul style="list-style-type: none"> - For example, what proportion of freight to the proposed Ardley SRFI is expected to be incoming by train, for distribution by road, as opposed to outbound by train? - Where freight is incoming by train, from which ports of arrival (or Channel Tunnel) are they likely to come? - As about 40% of UK-bound containers arrive at Felixstowe, what rail route would they take to get to the Ardley SRFI?

		<ul style="list-style-type: none"> - Does the proposed East-West Rail route have any role to play in the choice of site, and if so how? - SRFIs are primarily intended to replace congested rail freight facilities in urban areas (para 2.47 of Govt. Transport Policy Statement 2014). SRFI sites adjacent to urban areas, where most people live, would therefore reduce HGV movements of freight. The ES should explain why a greenfield site in open countryside far from a major conurbation has been chosen. -
5.10, 5.11	Transport Assessment	<p>An approximate number of daily HGV movements for the facility should be given at this stage. and the ES should contain a consideration of the effect of any increase of traffic on the villages of Ardley and Fewcott and Middleton Stoney, including changes to the M40 and any proposed bypass of the villages.</p> <p>In similar vein, the ES should give an approximation of how many employees there are likely to be, and approximately how many car parking spaces are to be provided. and the environmental effects of these traffic movements on all local roads.</p> <p>It is understood that skilled workers are required for many aspects of the operation of an SRFI. The Report should provide an assessment of the availability and proximity of such skilled workers. and the effect on the local area of anticipating commuting traffic.</p>
5.35	Transport – future baseline	<p>It is good that the Future Baseline will “represent the planned and committed development and growth, and infrastructure, which already features in Local Plans and other documents or strategies.” It is essential that the entire context of wider planning developments and proposals in the area are taken into account (see also comment on 5.516), including HS2, EW Rail, The Great Wolf Development at Chesterton and development at Upper Heyford.</p>
5.500	Climate Change	<p>There is reference to “The transfer of freight from road to rail which has an important part to play in a low carbon economy and in helping to address climate change.” This role needs to be supported with evidence of the scale of the contribution that the Ardley project will make.</p>
5.516	Cumulative Impact	<p>In the category of “Planned developments which are reasonably foreseeable” should be added a major proposal for a Distribution and Manufacturing Park of 278,000 sq.m. at J10 Baynards Green being prepared by Albion Land for submission to Cherwell District Council.</p>