



The countryside charity
Oxfordshire

Campaigning to protect our rural county

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Dear Sir/Madam,

Re: OxSRFI consultation -CPRE Cherwell District response

The Campaign to Protect Rural England (CPRE) Cherwell District works to improve, protect and preserve the landscape of its towns and villages for the benefit of everyone.

We welcome the opportunity to respond to the first stage consultation of the proposed Strategic Rail Freight Interchange which is proposed for Ardley.

Feedback on consultation process

Several of our members attended the two webinar calls, as well as the four open events, held locally in and around Bicester/Ardley. Whilst the calls and the events were informative, the majority of the information disseminated appears to have been of a general nature with limited detail supporting claims made. We believe there is one further consultation stage proposed suggesting that the necessary dissemination of information and data will be condensed into a relatively short time cycle. It is imperative that all necessary information is made available in good time to local consultee bodies and members of the public so that there is sufficient time to read and digest all the necessary information thus enabling consultees the ability to provide considered responses.

The webinars were helpful but CPRE Cherwell is concerned that these would have disadvantaged those who did not have access to a computer. In engaging with the public, we believe all media should be utilised including mailing and the use of advertisements in the local press as necessary. All of the questions and answers from the respective webinars should be published and made available for public view.

Our concerns:

1. Is this Strategic?

The question as to whether this is strategic or not has a bearing on the public consultation route that is ultimately taken. Strategic infrastructure projects are determined directly by the Planning Inspectorate and miss out local planning processes where planning applications are considered by council members elected



by the public and subject to allocation in a local plan, which is also agreed and approved locally council members. CPRE Cherwell is not convinced from the information provided that this project can be truly regarded as strategic and would like the developer to explain why it is in this case. The fact that it is on the freight national network is not in itself sufficient justification to classify it as strategic. CPRE Cherwell is keen that this development mirrors the same rigorous process that is applied to local planning applications. This is particularly pertinent in this case as two proposed major road freight warehouse developments that are close to this site, are being considered through the local planning process. The distinction between these two and the proposed SRFI matters.

2. Why is the site so large?

The proposed development is of an industrial scale that CPRE Cherwell believes is the largest industrial development in terms of scale to come forward in Oxfordshire. A cursory look at the map shows that this development, when fully developed, is greater in size and scale than any of the adjoining villages. The development promises 9,000 jobs directly. This should be seen in the context of the current population of Ardley which according to the latest estimates was 712. CPRE Cherwell does not believe that the SRFI sponsors have fully established why a rail freight interchange is required and furthermore why it needs to be a strategic rail freight interchange or indeed of this size. We believe that the current railway line, which is operated by Chiltern Railways, is principally a passenger line used only occasionally for freight conveyance. Furthermore, the current line does not have direct connection with any seaports. The current site does not contain any significant warehousing and therefore the existing road infrastructure required would have to be developed from scratch. CPRE Cherwell would therefore like to understand what local and strategic needs are being satisfied by the proposed SRFI.

CPRE Cherwell is concerned with the sheer size and scale of this development which we learned from webinars was significantly greater than the minimum recommended size of a strategic rail freight interchange (60 hectares). Of course, when you are looking for a site that reflects the size of the proposed Ardley site then the potential of sites of this size being available on more suitable brownfield sites is going to be diminished. There seems to be a trend in logistic developments of proposals for large scale warehouses where the need for scale is rarely ever justified. CPRE Cherwell is therefore keen to establish why this site needs to be in excess of 300 hectares particularly as 45% of the site is not hardstanding. We question the sheer scale of this development which in its entirety coalesces the settlements of Ardley and Heyford and submerges their distinct identities into an industrial landscape

3. Is this really moving more freight by rail, or just more freight by road?

CPRE Cherwell supports the general principle of moving freight by rail rather than road as it better able to meet Government's climate change commitments based on the current mode of road fuel used by hauliers which is petrol and diesel. Freight that can be transported by rail should reduce the amount of land take for roads which will lessen the pressure on our countryside. It is therefore concerning that this development, far from reducing the construction of transit routes such as roads, will increase the number of roads locally. This is a necessity for this site as the local infrastructure to support this development does not exist and has to be built from scratch. CPRE Cherwell cannot therefore support a movement from road



to rail which has such an impact on our existing local communities. This is given more weight when the claimed transfer of road to rail in this case will only represent 10% of freight transported from this site. This again begs the question as to **what is the true purpose of this development** and is it a genuine strategic rail freight interchange or a road freight interchange. It also begs the question as to whether this site is really the most appropriate site for this type of development.

In addition to this development, two new road warehouses are proposed in the neighbouring settlement of Baynards Green. The combined square meterage of these warehouse developments is not dissimilar to that which is proposed for the SFRI. It is therefore pertinent that no new roads are proposed for either of these developments. Given that one of the attractions of the SFRI is that it will move freight from road to rail, it is somewhat ironic that the SFRI will require new roads to cope with additional transport movements.

4. Is this site in the right location and needed?

CPRE Cherwell sees little evidence that proximity of other SRFIs have been properly considered as part of this consultation process. It would have been helpful for the first stage consultation exercise to include case studies of existing SRFIs and whether they are having the desired impact in moving freight from road to rail.

CPRE Cherwell has reservations that the Chiltern Line has the capacity and technical feasibility to accommodate the rail freight traffic proposed and we would wish to see further detail on this in the next stage to comment further.

The existing site is used for agriculture. CPRE Cherwell can find no mention within the consultation documents of an evaluation as to the economic benefits of the site continuing to be used for agriculture. Quite apart from suiting the current skill mix of the local population, given the global position regarding food production, there is an increasing need for the UK to retain its arable land for food production.

5. The site chosen has significant public transport and local employment limitations

One of the issues with this site is its distance to the nearest major settlement. Bicester is nearly 5 miles away. With only a limited public transport timetable to Ardley, it is likely that this development will be heavily car dependant. This of course will add further pressure to already stretched local and national road networks. CPRE Cherwell has a major misgiving with regards to the adequacy of design of the nearest motorway junction (M40 junction 10) that will service this development and this will be exacerbated if the two road freight warehouses at Baynards Green are approved. One of these is proposing a lorry park which will bring further traffic stress in its own right. The National Planning Policy Framework (NPPF) para 105 states that significant development should be focussed on locations which can be made or are sustainable which both limit the need for travel and offer genuine alternative modes. Quite apart from the lack of available public road transport, there is not a railway station at Ardley and having talked to the developers it appear that no station is planned for the future.

CPRE Cherwell believes that this development has the potential to both significantly increase commuting travel and this, along with the significant haulier traffic, will create significant traffic related harm to local



communities such as significant noise, pollution, and congestion, none of which are compatible to tackling climate change. CPRE Cherwell would expect the applicant to provide sustainable and active travel modes which provide viable options for those travelling from the nearest largest settlement, Bicester, as part of their travel plan. However, Bicester has a high number of its residents in full employment and the demand for labour has intensified given the proliferation of approved development in and around Bicester. It will therefore represent a significant challenge for this development to be able to source local labour for this development. Bicester already has a high proportion of its workforce employed in the transport and distribution sector. A recent local planning application expected to source employees as far afield as Stratford which is 40 miles away. CPRE Cherwell believes that it will be near impossible for this development to limit commuting traffic. The impacts of this must be properly considered in both the applicant's traffic assessment and properly considered in the development's carbon emission calculations.

It is accepted that the proposed SRFI will create some jobs, possibly an estimated 9,000 jobs directly and 5,000 indirectly. Quite apart from the issues as to where this pool of labour will originate from given the local employment position in Bicester, CPRE Cherwell would welcome more information on the breakdown of posts. We question how this number was determined for this site and how many of these positions will actually come from relocation from other premises.

6. Is the TOTAL impact on the wider environment and biodiversity being properly assessed?

CPRE Cherwell is concerned with the potential impact of this development on the wider environment and biodiversity. The developer claims that a 10% gain in biodiversity should be achievable on site. We are very keen for the biodiversity net gain assessment to be shared with consultees in its entirety. CPRE Cherwell would expect the latest calculator to be used, currently DEFRA 3.0. We would expect future proposed created and enhanced habitat to be realistically assessed and underpinned by a proper land management plan. Any stated gains should be in perpetuity as the loss of land to this development will be forever.

CPRE Cherwell would expect the developer to undertake proper on-site habitat and species surveys and associated reports at several and appropriate times during the year. This will enable consultees to properly assess the impact of the future development on existing on-site site habitat and enable the identification of habitat or species of known or potential ecological value. There are a number of sites of particular biodiversity interest either within or adjacent to the site and CPRE Cherwell would expect the impact of these to be properly evaluated during the construction and then operating phases.

Conclusions:

On the basis of the information currently provided, we are not convinced that this development is either required, or if so, appropriately located and that the full impacts on the environment have been accurately assessed. Given that analysis, CPRE Cherwell would currently oppose this application.

At the next stage it is imperative that further detail is provided in order that we are able to give considered feedback. Our particular areas of concern are:

- Justification for this site and its classification as strategic



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- Justification for the size of the site
- Breakdown of rail vs road freight movement on the site
- Technical detail on the rail freight offering/ timetable
- Detail on the employment of the site including the number of new vs transferred posts and a breakdown of posts especially in relation to rail vs road
- An assessment of travel to work home locations and transport modes and the subsequent impact of this on traffic and emissions
- Detail of the biodiversity net gain claims made shared with consultees

Yours faithfully,

Robin Oliver
Chair, CPRE Cherwell District