


Stone Edge
Wroxton Heath
Banbury
Oxfordshire
OX15 6EU



Mr Bob Neville
Planning Officer
Cherwell District Council North Oxfordshire
Bodicote House
Bodicote, Banbury
Oxfordshire OX15 4AA

18th September 2020

Our Ref: Stone Edge/PlanApp:20/0243/F
Your Ref: Planning Application 20/0243/F

Dear Mr Neville,

**Full Development: 20/0243/F
A Fuel Depot including Ancillary Offices, the Installation of Plant & Hardstanding.**

I am writing to object to this application in the strongest possible terms.

I am the owner of Stone Edge, Wroxton Heath, which will overlook the site of the proposed development.

As the owner, of a property in the nearby vicinity, the proposed application will directly impact me & my family including a young child.

I wish to object for the following reasons:

In Principle –

Certas Energy currently has a fuel depot in Banbury, in an already industrialised location very close to major transport routes including the M40, A427 & A361. In my opinion, there is no sound business reason to relocate to the proposed new site at Hornton Grounds Quarry, the principle driving factor for the move may well be the potential re-development land value of the existing Certas Energy Banbury depot site. The existing fuel depot site is far more suitable, being in an already industrialised location & in any case, this should quickly be phased out in favour of low carbon alternative fuel technologies. The proposed site would transpose an industrialised petrochemical/fossil fuel facility into the heart of rural, agricultural land, & sets a dangerous precedent for the industrialisation of rural north Oxfordshire. The proposed new site would effectively be 'land-locked' away from major road transport arteries, in a wholly unsuitable, unsustainable location, with a host of consequential, negative knock-on effects as listed below:

Highways Concerns & Highway Safety – The proposed site has no easy access to the Oxfordshire Lorry Route Network. This section of the A422 has a reputation among motorcyclists as a high-speed route. There have been a number of serious accidents directly by the proposed access onto the A422, on both carriageways. The bend on the A422 heading towards Banbury, just before the Hornton Grounds access, is a hazard for HGVs and other traffic which invariably travels too fast down the long straight stretch past the Alkerton Business park, this is followed by a fast, sweeping bend, of which the apex is where, potentially, 158 articulated fuel tanker lorries per week, will have to perform wide, sweeping turns in order to enter & exit the proposed depot, which clearly represents a potentially catastrophic hazard. Current quarry lorries only operate during normal working hours which tends to be daylight. Fuel tankers will exacerbate the problem as they can only turn slowly off the main road and would operate day and night. In addition, large fuel tanker lorries will inevitably pick up spilled petrochemicals, mud & debris from the site itself & its access road. Upon exiting the site, there is a very real risk that lorries will deposit what would build up to be a slippery ‘slurry’ on the road, which is sited at the apex of the aforementioned fast bend in the road where vehicles are travelling at speed from either direction, & where stationary traffic, both from the proposed site & from where the Alkerton Hill road, opposite the proposed site, will be joining the A422. This could have significant & potentially lethal consequences for the drivers of vehicles joining the A422 & drivers of vehicles who may have to unexpectedly brake along this section of the A422, especially if the road is then also an oil & mud slick. In addition, the proposed development poses a significant risk to walkers. The A422 on either side of the entrance to the site forms part of the D'Arcy Dalton Way, one of the most popular and heavily used recreational walking routes in north Oxfordshire and the adjacent Cotswolds AONB. The poorly maintained and frequently overgrown verge means that walkers, often with dogs, have to walk along a 250 metre stretch of the unlit A422 which would be shared with lorries from the proposed depot. This is clearly a hazard.

Air, noise & light pollution – 158 large, diesel powered, fuel tanker lorries, would potentially drive along the A422, (which is only 100 metres or so from my property) heading towards Banbury, these lorries would be accelerating through their gears between the exit from the proposed site & where my property sits parallel to the A422. This would mean that air pollution levels from these vehicles & the noise of their engines would be at their maximum in the vicinity of my property. The noise of a 24 hour operation of a petrochemical fuel depot (peak activity at 5.30am), with lorry movements across the proposed site, lorry reversing alarms, lorry lights including headlights, high-level front & rear lamps, beacon-lights & spotlights, plus high-level front, rear & side marker lights as well as 5m tall floodlight pylons on the site itself, & in addition to this, the noise & light pollution caused by the movements of other vehicles, including support vehicles & worker's transport on the proposed site, will have a considerably detrimental effect on my family & me as well as a great many other local residents & also wildlife.

Traffic generation & vehicle density – In addition to the 158 fuel tanker lorries per week, the majority of which will have to make their way through the narrow roads & tight corners of villages such as Wroxton & Drayton, there is also the matter of the work force commuting to & from the proposed site. The previous Sugarswell business park application stated that all employees in the CERTAS Banbury depot currently arrived by car. As the new proposed site is in a rural location, it is highly likely that this practice will continue, which will be detrimental to the wellbeing of residents of the local area, particularly those living in houses & villages on the A422 such as Drayton & Wroxton, as well as my property, especially when taking into account that a significant proportion of workers will be arriving at the proposed site before what is expected to be the time of ‘peak activity’, 5.30am.

Nature conservation – The proposed development will have a detrimental effect on the wildlife in the local area. Balscote Quarry Reserve, which is close by, was purchased by the Banbury Ornithological Society in 1998. This 6.2 hectare disused quarry site provides a wonderful

wetland habitat for birds. There is also a deep pool which retains water all year. The reserve attracts breeding Lapwing, Little Ringed Plover, Sand Martin (all 3 being protected bird species), Mallard & Little Grebe. It also attracts many species of Butterfly & Dragonfly. The light pollution from the 24 hour operation of a fuel depot, including the lighting impact on dark skies from 5m tall floodlights & round-the-clock movements of lorries with vehicle lights make this an unacceptable risk to wildlife. In addition to disrupting circadian rhythms, excessive artificial light at night (ALAN) which will be caused by the proposed development, can also disorient birds during migration. Bright lights at night attract birds in the same way that bright porch lights attract moths, which can result in fatal collisions.

Environmental protection – The proposed site overlies a principal aquifer. A fuel spill could have a catastrophic impact on wildlife associated with the stream which originates just downhill and becomes one of the main tributaries for the Sor Brook. Its potential impact is likely to be widespread, including the potential to poison a number of species of protected birds inhabiting the nearby nature reserve with its low-lying, deep pool of water. Pond dipping in the lake nearby produced a healthy list of freshwater invertebrates, Evidence over recent years of flooding after heavy rains and run-off from the quarry site into local watercourses again reinforces the on-going risk to the environment.

In conclusion, the ‘optics’ of permitting this entirely retrograde proposed development to proceed could not be worse for CDC itself. If permitted, Cherwell District Council will render itself completely at odds with CDC development policy in a rural area as outlined in the current Local Plan and HM Government’s National Planning Policy Framework (NPPF) guidelines for sustainable development. There is also the very serious risk of irreparable damage to the good reputation of CDC, in so much as it could be construed, whether correctly or incorrectly, that the applicant is underhandedly exploiting the current Covid-19 Coronavirus crisis in order to ‘bury bad news’, & put the application through the planning process with as little opportunity for local, public scrutiny as it is possible to achieve, whilst the minds of residents potentially impacted by the proposed development, may be focused on infection rates & a ‘second wave’. CDC could risk being seen as being party to these tactics, were this to be the case. If this application proceeds, CDC will also risk being regarded as complicit in aiding the environmentally harmful & unsustainable, carbon based, petrochemical & fossil fuel industries. Permitting the proposed development would also be contrary to the movement to control global climate change, which is backed by the vast majority of public opinion, quite apart from myriad environmental protest groups, who could potentially be the cause of local disruption should development permission be granted.

The proposed development is, unsafe, unsustainable, unwanted & unnecessary, & for these reasons, & those listed above, I am opposed to Certas Energy’s application to build a fuel depot with ancillary offices, plant & hardstanding.

Yours sincerely,

Andrew S Bock.