

Dear all,

Proposed Fuel Depot at Hornton Grounds former quarry (Ref. 20/02453/F - scheduled for 10 December 2020 planning meeting)

In its submission to the Planning Portal (submitted 14/10/2020) Hornton Parish Council (HPC) have raised concerns about the proposal by CERTAS to develop a fuel depot at a former quarry at Hornton Grounds.

At a recent Zoom meeting of HPC held in November 2020 Messrs Peter Frampton of Frampton Planning and Steve Nelson of CERTAS gave a presentation to HPC councillors, and responded to questions. HPC is grateful for the time they committed to this and the opportunity to question them. However, HPC remains opposed to the proposal and in some respects their presentation and response reinforced our concerns and raised some new ones.

Overall, HPC remains strongly opposed to this plan. We still believe that important elements of the application, such as potential impacts of fuel spills and increased traffic, are weakly researched and it retains most of the negatives and flaws that led to another CERTAS application for a similar depot in a neighbouring site being rejected by Cherwell District Council (CDC) in 2019. The subsequent publication of CDC's 2040 local plan, including its goals for the 'tranquil' areas of North Oxfordshire, render this proposal even more inappropriate.

We would urge you to refuse this application on December 10, and to recommend that CERTAS pursue alternative sites that are closer to the primary road network and are a closer fit with CDC's strategic priorities as described in the local plan.

Specific responses to the CERTAS presentation and responses are:

1. Parts of the application submission are inaccurate and misleading:

- CERTAS confirmed that lighting gantries will be above the bund, not below as stated in their original application. Therefore, our objection based on increased light pollution is reinforced.
- CERTAS confirmed that no flammable petrol would be stored on site, and that the inclusion of petrol storage on their application was incorrect (and has since been corrected). HPC are troubled that such a significant error could have been made, and our concern is raised by this inaccuracy in the application. We wonder whether the inclusion of petrol in the original submission is an indication of future intent?

2. Nearby watercourses and fuel spill concerns

- CERTAS confirmed that no hydrological survey has been carried out, despite the high sensitivity of its location (see below).
- HPC propose that modelling the potential impact of a major fuel spill is essential. We believe that mitigation and clean up measures if such an event was to occur would be impossible to deliver.
- Although CERTAS questioned whether the proposed site sat above an aquifer HPC believes that a secondary aquifer lies below the site and it is in an area of High Groundwater Vulnerability
- HPC is very familiar with the local drainage around this site. It is located immediately adjacent to, and within a network of, springs and streams radiating out to areas of high conservation interest, including the Northern Valleys Conservation Target Areas (CTA) and Cotswolds AONB.
- CERTAS confirmed that there had been a previous significant spillage at another CERTAS fuel depot (but not on the scale of the Buncefield fire).
- HPC were not reassured that the widespread and long-term impact of a similar accidental leak (either from the bunded storage area or during transport/transfer to tankers) had been given sufficient weight in the application.
- In conclusion, CERTAS and HPC retain strongly differing views concerning water safety issues and HPC has not been reassured by the responses received to date.

3. Proximity to Conservation target Areas and AONB:

- HPC remains concerned that areas of high conservation value could be threatened by a fuel spill. (Note: proximity to the AONB was flagged in CDC's Sugarswell refusal for an almost identical application, again by CERTAS, in 2019.

4. Traffic, highways and other expansion concerns:

- HPC remains concerned that due regard has not been given to the lack of suitable sightlines and significant hazards posed to traffic on the A422
- HPC remains unconvinced that workers arriving by public transport or bicycle is feasible
- CERTAS stated that there would be no future expansion at the site. However, HPC remains unconvinced, not least because their earlier application stated 'The proposal is to enable CERTAS Energy to relocate from its premises in Tramway Road, Banbury – enabling expansion and the provision of a more efficient operation. Productivity will be improved for the company by this investment.'
- HPC questions whether the number of future lorry movements stated in the application would be sufficient for this ambition to be achieved.
- HPC's concern that future expansion at the site is reinforced by the fact that CERTAS' proposed site plan includes the dotted outline of a 7th fuel tank.

5. Precedent set by a previously rejected application at a neighbouring site:

- CERTAS confirmed that no alternative sites to Hornton Grounds Quarry (HGQ) had been properly researched, although many sites had been considered (CERTAS have subsequently sent details of the search for suitable sites to HPC).
- HPC remains perplexed why HGQ was chosen as a suitable site when an application by CERTAS to locate a new fuel depot at an adjacent site at Sugarswell was rejected by CDC. Both sites share almost identical barriers.
- The publication of the Cherwell 2040 Local Plan has further highlighted the incompatibility with CDC's priorities for future development in the 'tranquil' rural villages and areas in North Oxfordshire.

If you would like further information please feel free to contact me. The HPC would welcome an opportunity to talk to you if you felt that would be useful. We are becoming very familiar with Zoom meetings!

Kind regards

John Offord
Chair Hornton Parish Council