OxSRFI

OXFORDSHIRE

STRATEGIC RAIL FREIGHT INTERCHANGE

GB Railfreight Supporting Statement

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On behalf of

Oxfordshire Railfreight Limited

Prepared by GB Railfreight

March 2026

GB Railfreight

Proposed Strategic Railfreight Interchange at M40 Junction 10, adjacent to the Chiltern Main Line, Oxfordshire (OxSRFI).

Supporting Statement from GB Railfreight

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Introduction

1. GB Railfreight ('GBRf') is one of the three principal providers of rail freight services in the UK and the fastest-growing licensed Freight Operating Company ('FOC'). From a cold start in 1999 the business achieved an annual turnover of over £300m in 2025 and is consistently profitable. The company runs freight services for many of the country's traditional users of rail - the aggregates and fuel businesses for example – and it continues its strong growth in the 'intermodal' market, now running 31 trains each day in the haulage and onward distribution of containerised freight. GBRf is owned by Infracapital, a subsidiary of M&G Prudential.

2. The company's growth is entirely consistent with governmental aspirations for the sector as a whole. Every government since rail privatisation in 1994 has said that it wants rail freight to take a larger percentage of the UK surface freight volume. In December 2023, the then government set a clear target to grow rail freight by 75% by 2050. That target has been endorsed by the current administration.

3. In an arrangement that is designed to meet both government policy and its own growth plans, GBRf has entered into an agreement with Oxfordshire Railfreight Limited by which it will operate the proposed rail freight terminal that forms a major part of the scheme.

4. In purely statistical terms, the rail freight industry's performance has been mixed in recent years. Traditional sectors – power station coal and metals production, for example – have declined substantially but the industry as a whole, and GBRf in particular, has massively increased activity in other areas. Aggregates traffic, sustainable fuels and waste haulage are all growing but the most substantial growth is in container, or 'intermodal' traffic. The sector now forms some 40% of all freight movements. The industry anticipates that growth will continue.

5. Approximately one third of all 'deep-sea' containers – that is product imported from and exported to other continents – are carried by rail in the UK. Felixstowe has daily capacity for over 40 freight trains, Southampton over 30 and London Gateway will accommodate about 25. The balance between them shifts but incremental capacity enhancements both at the ports and the routes serving them will allow more – and longer – trains at each.

6. 'Short sea' traffic, primarily to and from Europe and Scandinavia is increasingly carried by rail as well. Recent notable successes have seen two trains per day from the enhanced facility at Teesport to iPort at Doncaster and a new service from Liverpool to East Midlands Gateway. Both of those inland terminals opened within the past five years and each now receives typically six trains per day.

7. After a hiatus caused by the migrant crisis of 2015/16, Channel Tunnel traffic from Europe is also recovering. There is scope to carry another 25 trains per day to and from Europe through the tunnel.

8. Further likely growth is in 'domestic' intermodal traffic – traffic between two in-land points in the UK. Those services, such as Tesco's trains from Daventry to Scotland, do run presently but they are relatively few in number. The single most significant constraint on their growth – and that of international traffic – is the lack of inland terminal space at which to load and unload trains.

9. It is in this context that GBRf is pleased to support the proposal to open a new Strategic Rail Freight Interchange at the OxSRFI site.

Rail Freight Market

10. The UK's rail freight sector is an example of successful private enterprise in what is essentially a public sector activity. Six companies were devolved out of British Rail in 1994. Those essentially became just two ongoing businesses – English, Welsh and Scottish Railways (now DB Cargo) and Freightliner – but several others have started and grown since. The most prominent of those is GBRf which now holds approximately 31% of the rail freight market.

11. As described above, rail freight at the time of privatisation carried enormous volumes of power station coal – over 100m tonnes pa – and products such as iron ore and limestone for steel production. Those markets have declined, practically to extinction in the case of coal, so the industry has had to adapt. It has done so and the pace of change is accelerating.

12. Rail freight is a highly competitive business, both within the sector and increasingly with road but it is also subject to regulation by the Office of Road and Rail ('ORR'). Operating margins are typically around 5% and FOC's are not permitted to engage in anti-competitive practices. Mechanisms exist to ensure fair play. Significantly, any rail terminal operated by a regulated FOC has to provide 'open access' to any other FOC on equivalent terms.

13. The combined turnover of all the FOC's is a little over £1bn per annum but Network Rail itself estimates the economic benefit of the industry to be over £2.4bn pa*. See https://www.networkrail.co.uk/industry-and-commercial/rail-freight/#:~:text=The%20total%20economic%20and%20social,headquarters%20of%20many%20freight%20operators. 14.

14. It carries products worth about £30bn every year on journeys that would equate to some 1.66bn kilometres if undertaken by HGV's on the road network. As a broad generalisation, the Rail freight Group (Why Use Rail Freight?) estimate that one freight train might carry the same payload as 76 HGV's.

15. It is dependable. Network Rail's Freight Delivery Metric indicates that some 94% of all freight services arrive within 15 minutes of their scheduled times and the

environmental benefits are beyond dispute; rail freight typically produces less than one quarter of the CO_2 of road transport per tonne/kilometre. And it is safe; serious accidents and fatalities are extremely rare on rail.

16. It performed exceptionally well in 2020 when called on to alleviate some of the issues attributable to the covid epidemic and it can be flexible; the intermodal service from the Port of Liverpool to East Midlands Gateway was established in only five days, from inception to operation.

    *Deloitte – Assessing the Value of Rail Freight, 2021

17. The industry is not complacent though; it understands and accepts that it has constantly to search for improvements in performance and efficiency. Initiatives currently include:

    - More efficient bi-mode locomotives that will run on electricity when available and sustainable fuels at other times to reduce emissions; GBRf has recently unveiled its new Class 99 locomotives, which will enter service this year.
    - New services that take the place of routes hitherto dominated by road transport. To do so rail has to be flexible and to match or better both the reliability and cost of road;
    - Route-sharing between FOC's to optimise laden weights and make best use of resources;
    - Improved integration between sectors throughout the supply chain to give the customer full visibility of stock and single point of contact for much of the journey;
    - Different methods of carrying products so that laden mileage is enhanced.
    - Assets are being used more productively; timetable enhancements and aggressive 'pathing' (optimising running time over a given route) allow fleets to be used twice per day instead of just once.
    - The development of new methods of carrying freight by rail. GBRf and others have recently undertaken successful trials for several organisations using converted passenger vehicles to carry parcels between two inland terminals.

18. All participants in the industry, including new entrants, share a common aim of attracting a higher proportion of distributive activity to rail. Clearly that enhances their own business but it also reduces the environmental impact of that activity, it reduces road congestion and it offers improved safety overall.

19. There is clear evidence that there are more would-be rail freight customers. Major supermarkets such as Sainsburys and Tesco have both built distribution centres with direct rail access. Businesses such as Nestle at East Midlands Gateway and

Amazon at both East Midlands and iPort have built on warehouse parks with adjacent rail terminals.

20. As the trend for near-shoring of components for manufacturing and assembly operations continues, or the European sourcing of finished products grows, so the viability of pan-European rail freight similarly improves.

21. The industry is finding new traffic, new enthusiasm and new customers. Its intrinsic strengths coupled with its environmental credentials mean that its future looks better now than it has done for decades. The preparedness of investors such as Infracapital (which owns GBRf) and CMA-CGM (owner of Freightliner) to acquire businesses in the sector underpins that view.

Constraints On Growth

22. There is, however, a limit to the growth of intermodal freight without extra capacity in the network. Fundamentally more terminal capacity to accommodate freight trains and the goods they transport. It also means, over time, the development of greater capacity for the networks to run more freight trains.

23. A very significant constraint on the growth of intermodal freight is the absence of suitably located terminal capacity. Rail freight and its many economic, environmental and safety benefits can only grow if it has destinations – terminal capacity – close to the point of production, national logistics warehousing or final use of the products the trains are carrying. The shorter the road elements in any journey, the greater the benefits of putting freight on rail.

24. Statistically, the industry occupies large areas of land that it does not use. There are rail yards in Scotland, in Northern England and in South Wales that, between them, cover hundreds of acres. But those sites were developed when rail carried coal, iron ore and limestone and when the demographics of the UK were very different of those of the 21st century. The economic justification for many of them has long since vanished and several of those sites are now derelict; some are highly unlikely ever to be used again for any significant rail activity.

25. Historically, that type of large yard was not built in the southern part of the country to anything like the same extent – there was not the same need as in the mining and manufacturing north – and there are none at all south-east of Birmingham that are readily accessible by road. Whilst the industry does have surplus land, that land is not close to the weighted centres of population.

26. In short, whilst the rail freight industry is ready and willing to increase the amount of traffic it carries and whilst its own aspirations, external drivers of change and government policy all support that objective, the industry owns very few sites capable of receiving and despatching large volumes of freight traffic. Network Rail's own internal studies suggest that its existing property portfolio might only support a 15-20% volume growth; the other 55-60% of the government's targeted growth must come from new rail-connected sites

27. It remains the case, presently, that product destined for or coming from south-east England is predominately carried by road, often over considerable distances. Those near-London distribution centres of the major retailers, from John Lewis at Milton Keynes to Morrisons at Sittingbourne, are all serviced by road alone.

28. Improvements to the capacity of the network to accommodate freight services is on-going. In recent years, Network Rail has worked with FOC's to improve journey times for freight so that, for example, some thirteen long-distance services have seen an average 11% reduction in journey time. The process of incremental improvements is ongoing with specific improvements to, for example, the lines between Southampton and Oxford, and Nuneaton and Felixstowe. Further upgrades are planned.

29. Freight has also gained access to High Speed One, the line between London and the Channel Tunnel; freight can now get to the eastern side of London without having to take a slow route through congested infrastructure in Kent.

30. The rail freight industry remains a keen supporter of HS2, even in its truncated form. For the freight sector, the additional passenger capacity that HS2 will generate will allow more freight to use the existing network south of Birmingham and – hopefully – north to Crewe.

GBRF's Plans

31. Recognising the significant changes likely to affect the sector, the rail freight industry set out its aspirations for more Strategic Rail Freight Interchanges ('SRFI's') many years ago; the term SRFI was first adopted in 2008. Government policy acknowledged those views – indeed promoted them – in the 2011 Policy Guidance document, which itself was succeeded by the 2015 National Networks National Policy Statement (updated in March 2024). Last December, the National Planning Policy framework was also updated and states that planning policies should "..pay particular regard to facilitating development to meet the needs of a modern economy. Including by identifying suitable locations for… freight and logistics."

32. The industry believes that it can make a real and substantial contribution to reducing carbon emissions, reducing congestion and improving road safety but it needs the terminal capacity, in the right locations, to be able to achieve those goals.

33. Several FOC's, notably GBRf and DB Cargo, have endorsed and actively supported a number of proposals by developers for new SRFI's including those at Northampton, Radlett and Colnbrook. But the number of consents granted has fallen well short of the number needed, and in the locations necessary, to alleviate the environmental, economic and safety issues so prevalent across the country and in particular, in the south east.

34. As part of an expanded network of SRFI's it is clearly essential that there are facilities provided in locations currently poorly served by rail but which can meet the requirement of the logistics sector. Sites which have the potential for volume freight to be carried into the southern part of England by rail to help serve the 18 million

people who live there and the businesses they work in, must form part of the expanded network.

35. It is for this reason that GBRf strongly supports the OxSFRI proposal and why it is keen to operate the facility.

36. The OxSRFI site is very well placed to serve as the location for national logistics facilities. It is in a relatively uncongested part of the south east with excellent road access. Rail links too are very good; the Chiltern Main Line has ample capacity for freight trains between scheduled passenger services. The Line has often been used to run freight services, either as regular timetabled freight or for diverted freight services and can be cleared to W8 gauge. The site is therefore ideally placed to integrate rail into the supply chain of occupiers wishing to locate there.

37. GBRf also believes the location to be well-placed to be able to reach existing distribution infrastructure not only in Oxfordshire, but also in the Midlands, the Thames Valley and large parts of London. Didcot, Reading and Swindon are all within about 40 road miles, Heathrow is about 50 miles and Park Royal about 56. Crucially the location potentially allows delivery vehicles to make several round trips to customers' premises in a typical driver's shift.

38. It has other advantages, particularly that of space. To be efficient an intermodal rail terminal should be capable of handling at least ten or twelve trains per day, each train arriving and departing in under four hours. It will be able to accommodate this. The terminal is alsoable to take trains of the maximum length envisaged in the UK – 775m including the loco – without having to 'split' the train, and there will be storage capacity for perhaps two or three days' stock of containers with associated lorry parking.

39. The Chiltern Main line can be cleared to W8 gauge which will allow for all potential freight services and containerised traffic to utilise the terminal. The Government have recognised that W8 is an appropriate minimum gauge requirement. It enables 8'6" containers to be transported on standard wagons or the larger 9'6" containers to be transported on low-platform wagons.

40. It also offers scope for 'express freight' so that parcels of goods picked and packed at a warehouse on the park can be shipped directly to destinations in London in less than one hour using converted passenger vehicles that can be readily integrated into the timetable as referred to at 17, above.

41. The proposed warehouse space adjacent to the terminal offers obvious synergies. If a train can deliver product almost to the door of the location in which it is held as stock then the costs and the environmental impact of the operation are both substantially reduced, service levels are enhanced and transit times cut. In overall terms, the supply chain simply becomes more efficient.

GBRf as Terminal Operator

42. Fundamental to supply chain efficiency is the necessity of offering customers, many of whom are new to rail, the confidence that their stock is on its way and that it will arrive on time. They need one point of contact and ideally direct access to a real-time system that shows them exactly where their consignment is at any one time.

43. Moreover, they want 'ownership'. They do not want to be told by a road haulier that the product is held up at the port or by the train operator that the terminal has lost the container. To coax customers away from road it is necessary, over and above rail's obvious strengths, to provide them with something that is easy to use.

44. Others have recognised that need. Businesses such as Associated British Ports, Maritime Transport (now part of Medlog), CMA-CGM, WH Malcolm and PD Stirling have all invested in inland rail terminals. But GBRf believes that it is well-placed to be able to add another dimension to the operation of those facilities given that it runs the trains itself. To extend its range of services in this manner, quite possibly with partner businesses, is part of the company's plan.

45. Through that, it can offer a degree of visibility, a managerial capacity and an influence that few others can; it will be able to provide a level of integration that is much harder for non-rail businesses. For example, it has direct operational contact with Network Rail and all other participants in the supply chain; it can devise solutions to operational problems at short notice and it can divert or provide additional trains when necessary. Through direct liaison with end customers it can improve reliability and service performance. As performance improves so will the customer base grow.

46. GBRf's operation of a terminal does not preclude other FOC's. GBRf is regulated by ORR and it is required, as part of its operating licence, to provide access to sites it controls to any other FOC on terms equivalent to those it charges itself and other customers.

47. In simple terms, GBRf cannot – is forbidden from trying – to limit traffic through a terminal and exclude or cause disadvantage to others whether through availability or through a pricing structure. Rather its aim is to extend and enhance its own business through improving its performance for its customers.

Target Market

48. As outlined above, GBRf believes it essential for new rail freight terminals to be brought forward to enable products to be moved by rail into the core south-east market in the UK.

49. There is no comparable rail freight distribution facility within thirty miles of the OXSRFI proposal and nothing at all to the south.

50. GBRf will set up rail corridors to and from the major ports, the Channel Tunnel and existing and proposed SRFI's elsewhere in the UK. It will offer end-user customers an end-to-end service and it will seek to attract new customers in new sectors to rail.

51. To be competitive, reliable and provide confidence, it will endeavour to offer a 'control tower' facility, a single point of responsibility and communication for all product movement whilst in the UK or from point of origin if that product is rail-borne through the channel tunnel. It will collect product from the factory or ship at the port, load it to rail, receive it at the OxSRFI and arrange onward delivery to the customer's premises. It will collect empty or refilled containers to take back to the site and then return them to the port or point of origin as necessary.

52. Those customers premises might be on site, but they will also be in the wider area, with facilities currently not served by rail. At OxSRFI, those products may be car parts for BMW Mini at Cowley, groceries and chilled products for Tesco at Reading or Asda at Didcot or possibly durable goods for B&Q at Swindon. Those companies mentioned above all use rail for primary distribution elsewhere in the UK but they cannot in the south east of England because the capacity does not exist. OxSRFI begins to address that issue.

53. GBRf has no present intention of running road vehicles itself but it will set up supplier arrangements with several road hauliers and allocate loads to those hauliers on the basis of price and performance. It is unlikely that any one haulier will be able to provide full coverage of the role. Of course there will also be customers who prefer to collect product rather than have it delivered and GBRf will tailor its service accordingly.

54. It is also now evidently the case that new SRFI's can very quickly generate substantial new business to rail. Those at iPort, Doncaster and East Midlands Gateway were opened with no defined customer base in place; they both now carry five or six trains per day , serving customers located on site and in the catchment of their terminals. Doncaster, in particular, is notable in that (i) Phase 1 of the terminal is now full; and (ii) though the service has ceased temporarily it has run two trains daily from Teesport, a journey of just over 90 miles. Those would previously have been judged as too short for rail to be viable but the service operates using only one loco and one set of wagons – it cycles twice every twenty-four hours and occupancy is high.

55. OxSRFI is well placed to replicate that type of traffic from Southampton. The journey is just over 80 miles; one locomotive and one set of wagons can easily make two round trips in twenty-four hours, replacing up to one hundred round trips by HGV and up to 16,000 road miles every day.

56. Similarly, it can receive product from inland points of origin, such as central Scotland or northern England. There are two existing terminals (and another consented) at Mossend in Lanarkshire, 340 miles distant. A round trip is entirely feasible every twenty-four hours. Teesport is 230 miles and easily achievable. One train per day

from Mossend carrying 50 containers would replace up to 34,000 road miles each day.

57. For outbound deliveries, OxSRFI is ideally placed to serve the wider south-east with express freight and parcels services, especially into London. The site's proximity to the market reduces the risk of delay or interruptions. One converted passenger train can carry the equivalent of twelve HGV's to an inner-London location where the load can be trans-shipped into local delivery vehicles. Each unit might make at least two and possibly three trips per day outside peak passenger hours.

58. GBRf believes that the presence of a new rail terminal at OxSRFI will do much to attract occupiers to the scheme. So many businesses now see their environmental and social obligations as key elements of their ordinary operations and a clear marker against which they are judged by their shareholders and their customers. There is every indication that the availability of regular and reliable rail services to and from suppliers and customers will become a more and more significant influence when making investment decisions.

59. The supply chain of the future needs to be robust, flexible, efficient and economical. Above all it needs to be reliable. Rail can provide those essential elements and it can do so in a manner that is both environmentally sustainable and safe.

Response to Consultation Comments

60. As part of the Pre-Submission consultation and engagement process GBRf were asked by Oxfordshire Railfreight Limited to review comments received by Oxfordshire County Council and Cherwell District Council in relation to rail matters. GBRf undertook this review and provided a Question and Answer Note to respond to the comments received and this Note was shared with the two Authorities. As this Q&A Note provides some additional detail and clarification, it can be read alongside this Statement, and has been Appended to this Statement for information.

APPENDIX

QUESTION AND ANSWER NOTE IN RESPONSE TO STATUTORY CONSULTATION COMMENTS FROM OXFORDSHIRE COUNTY COUNCIL AND CHERWELL DISTRICT COUNCIL

OxSRFI Comments – GBRf Response (January 2026)

Purpose of this Note

GBRf have been asked to provide a response to questions that have been posed following the receipt of comments by Oxfordshire County Council (OCC) and Cherwell District Council (CDC) to the Statutory Consultation process.

To help with providing a clear response to the comments received, specific questions relating to rail matters have been extracted from the comments, and a response to these questions provided.

For ease of reference the relevant rail related parts of OCC and CDC's consultation response is appended to this Q&A paper.

1. Evidence that W8 gauge clearance will not reduce the commercial attractiveness of OxSRFI

From the outset, we have explicitly acknowledged the limitations of W8 gauge clearance on routes serving OxSRFI. However, it is important to emphasise that this constraint is well-understood, long-standing, and already accommodated successfully across multiple parts of the UK rail freight network.

OxSRFI is intended to attract flows of standard ISO deep sea containers, most commonly 40-foot, 9'6" high "high cube" units. These are the predominant cargo type entering the UK's major deep sea ports from the Far East and Indian Subcontinent. The key point is that these containers can be conveyed safely and efficiently on low platform wagons, a solution that has been in mainstream use for over three decades.

Low liner Wagons Are Standard Practice, Not Specialist Equipment

The FLA low liner wagon provides an instructive comparison. With 540mm wheels and a deck height of 715mm, it offers a significantly lower carrying height than a traditional 920mm wheel/1,155mm deck wagon. This enables 40' high cube containers to be transported within W8 gauge constraints without modification to the infrastructure.

The additional maintenance cost associated with low liner wagons is marginal in the context of total service operating costs, which are dominated by traction, fuel, crew and locomotive leasing. The maintenance difference is trivial compared to the commercial returns associated with new intermodal flows.

Crucially, low liner wagons confer a commercial advantage: their ability to access a wider range of routes increases network flexibility and supports the industry's strategic aim of modal shift from road to rail. As national demand for rail freight grows, GBRf expects to increase its low liner wagon fleet irrespective of the OxSRFI project. This is an industry-wide trend.

Established, Proven Technology, Not an Experiment

The FLA wagon family has been in continuous use since 1989/90. Freightliner's substantial order in 2004/05 further cemented its role as a core part of the UK intermodal fleet.

Operators, maintainers and infrastructure managers all have long-established experience of working with this rolling stock type. There is no technology risk, no learning curve, and no performance uncertainty.

In summary:

- W8 gauge does not diminish the viability or attractiveness of OxSRFI.
- The wagon types required are commonplace, proven, widely available and industry standard.
- Any cost differences are marginal and do not affect commercial decisions.
- Network flexibility gained from low liner wagon capability is a strategic advantage, not a liability.

2. Reliance on specialist/expensive trucks or wagons

OxSRFI will rely, at least initially, on low liner wagons for the deep sea container flows that dominate the UK market. However, these wagons are not specialist, and they are not disproportionately costly relative to the commercial benefit they support. The cost of wagon maintenance represents a very small proportion of total train operating costs, typically measured in pennies per mile. Decisions about service provision are driven by market demand, customer contracts, reliability, and path availability, not by marginal wagon cost differences.

Therefore, OxSRFI's business case does not rely on unusual or punitive capital or maintenance investments.

3. Whether dropped bed wagons halve container capacity compared to W10/W12 wagons

We do not agree with this assertion.

The actual carrying capacity varies by wagon design and is typically well above half of a standard flat wagon's capacity. More importantly, there is no operational necessity to use dropped bed wagons on the flows relevant to OxSRFI.

Understanding the Market Context

OxSRFI's primary inbound market is deep sea container traffic from the Far East. These flows overwhelmingly enter the UK via:

- Felixstowe
- London Gateway
- Southampton

These ports dominate not only volume but also vessel size and handling capability. Gateway and Felixstowe in particular handle vessels of up to 24,000 TEU, among the largest in the world.

By contrast,

- Liverpool
- Bristol
- Teesport

handle much smaller vessels. These ports serve niche, regional or continental markets and cannot compete with the scale, cost efficiency or frequency of services available at the major deep sea terminals.

Gateway's Rapid Growth and Network Rail Priorities

London Gateway's expansion is reshaping UK freight logistics. Its ongoing berth development, combined with MSC's acquisition of the Coryton site, will dramatically increase future volumes. Network Rail has explicitly identified capacity enhancement of the Essex Thameside corridor and associated north Thames routes as its highest freight priority.

This reinforces the long-term importance of the low liner wagon fleet and underlines why OxSRFI's reliance on such wagons is not a constraint but a reflection of wider market direction.

Summary

- The "half capacity" claim is factually incorrect.
- OxSRFI does not need dropped bed wagons.
- Deep sea flows overwhelmingly use major ports that already use low liner wagons extensively.
- Market evidence strongly supports OxSRFI's freight profile and routing assumptions.

4. Narrative/evidence on paths between Crewe and Teesport

At this stage, the planning requirement is to confirm whether four daily out and back paths between OxSRFI are likely to be accommodated within the timetable through standard processes. This has been thoroughly assessed (see PRA report) and the conclusion is unequivocal:

Yes, four circuits can be reasonably expected to fit within the timetable framework.

Attempting detailed future pathing on other routes, years in advance, would be:

- speculative
- technically unsound
- contrary to normal timetable planning practice

Timetables evolve continually and Network Rail cannot provide granular pathing certainty several cycles ahead. What matters is that the structural feasibility exists, which it does.

From Crewe, onward flows to ports such as Liverpool are supported by generous turnaround windows, providing operational resilience and flexibility. GBRf considers it likely that these flows could be accommodated through routine timetabling.

There is no further evidence to add regarding Teesport at this stage.

5. Connections with Felixstowe and the Chiltern/Cherwell Valley interface

Services between OxSRFI and Felixstowe are feasible and commercially likely. Northbound paths via Water Orton, Leicester, Peterborough and Ely provide a robust routing option, all well understood and regularly used for other freight flows.

Chiltern Main Line Access

Accessing the Chiltern Main Line is not inherently difficult and compares favourably to access arrangements for terminals GBRf already serves. The UK network is full of similar junction constraints, all routinely managed within the timetabling process.

Future routing flexibility is strong:

- West Midlands connections support flows to Liverpool, Felixstowe and potentially East Coast ports.
- Southbound connections to Wembley, Gateway, Felixstowe and Southampton remain entirely feasible within the legal parameters of the Network Code.

Timetables are not fixed entities. A 2026 timetable is not a template for 2027 or beyond. Freight cannot be constrained by the argument that “current patterns must continue”; that is wholly inconsistent with the model shift and freight growth objectives mandated by Government.

6. Southampton access and capacity north of Oxford

The analysis confirms that at least four round trip daily paths can be accommodated, which is the key test for this planning stage.

Southampton is one viable port option, but OxSRFI is not dependent on it. Flows may originate from Gateway, Felixstowe or Liverpool depending on customer requirements.

Routing via Reading and London is significantly less problematic than suggested by OCC. GBRf would avoid Banbury reversals, as this is unnecessary. The Great Western Main Line offers suitable freight windows and is used extensively for similar flows today. Passenger services are adjustable under the Network Code to support freight demand and have been modified successfully many times before.

7. Elizabeth Line capacity issues

While the corridor between Reading and Acton is busy, it is not saturated. Reserved capacity, long-standing freight windows and the ability to adjust passenger timings all provide operational scope. The Elizabeth Line’s impact is most relevant to Southampton flows only, not to flows from other deep sea ports.

8. The proposed Banbury run around

GBRf disagrees with OCC’s suggestion of building new infrastructure north of Banbury. The current Banbury Down Goods Loop already provides:

- a length of 806m
- the ability to run round 750m intermodal trains

This is sufficient for operational flexibility. However, both way movements through Banbury Platform 1 would introduce a known pinch point at certain hours, making this a suboptimal primary routing choice. This reinforces the strategic sense of routing via Reading and the GWML instead.

9. Re use of Wembley paths

The availability of retired GBRf paths is not a critical dependency for OxSRFI. The route south to Wembley retains sufficient structural capacity for freight growth.

Network Rail routinely:

- removes unused operator paths,
- converts some into strategic freight capacity, and
- adjusts passenger services to comply with the Network Code.

The Government's statutory freight growth targets for 2029 and 2050 ensure Network Rail must prioritise freight supportive capacity planning.

10. Demonstrating frequent connections to major deep sea ports

At this planning stage, it is not required, nor methodologically appropriate, to specify detailed future train plans for individual ports. Such detail would be premature and could distort assessment, especially given differences in container height, wagon type and routing options.

However, structurally, four daily circuits to Crewe enable multiple viable onward port connections, including but not limited to Liverpool. This flexibility supports a strong commercial model without tying OxSRFI to any single port.

11. Avoiding the GWML between Reading and West Ealing

Flows to Liverpool and Felixstowe do not require the GWML. However, there is also no operational reason to avoid the corridor. It is a core part of the UK freight network, and GBRf will use it where commercially and operationally appropriate.

12. Impact of OxSRFI paths on Chiltern passenger capacity

It is neither possible nor appropriate, to provide assurances about hypothetical future passenger service aspirations. Freight paths will be negotiated to:

- comply fully with Timetable Planning Rules,
- sit correctly within established headways, and
- not to contravene any capacity protections.

Future passenger or freight open access bids cannot be foreseen and cannot legally be protected in advance. The Network Code operates on a "bid and prioritisation" basis, not on speculative future reservation.

Relevant Extracts from OCC's and CDC's Consultants comments.

Relevant section in their consultation response relating to gauge clearance

The National Policy Statement for National Networks at paragraph 4.82 outlines that as a minimum SRFI should be located on a route with a gauge clearance of W8. It is acknowledged that the Agreed Position Statement with Network Rail confirms that gauge clearance of W8 is possible on the Chiltern Main Line following works to the Ardley Tunnel. The Council have no reason to disagree with Network Rail on this issue and are not contesting that the proposed development would not comply with paragraph 4.82 of the NNNPS as far as that paragraph relates to the requirement to achieve W8 clearance.

However, the Council is concerned that if the SRFI is only capable of being served by trains with a W8 gauge clearance this will impact the attractiveness of this facility to potential customers.

The applicant's Rail Report at paragraph 6.3.2 outlines the difficulty of accommodating modern deep sea shipping containers on much of the rail network. These intermodal deep sea containers require a gauge clearance of W10/12 if they are to be transported on a conventional truck.

The Council notes that all of the SRFI approved by the SoS since the introduction of the NSIP regime have been on sections of line served by a minimum gauge of W10. This means that intermodal containers have been able to reach these facilities on conventional trucks. It also means that the adequacy of W8 gauge for a modern SRFI has not been subject to the scrutiny of an Examining Authority or the Secretary of State.

It is also noted that Radlett (Park Side) SRFI, which was submitted under the TCPA prior to the adoption of the Planning ACT 2008, was conditioned via a Grampian to ensure that the whole site could not be occupied until works were completed to ensure that the Midlands Main Line was served by W10 gauge clearance.

It is clear then that W10 gauge clearance has been the industry standard for SRFI since at least 2008 to allow them to make the most of intermodal connections.

In their Rail Report the applicant outlines that there are solutions to this issue which either involve investment in rail infrastructure to secure the appropriate gauge or investment in specialist trucks with a dropped bed to allow intermodal containers to achieve the appropriate clearance. They then list examples of where SRFI such as DRIFT have used such specialist equipment to allow connections to places such as Cardiff which are served by W8 gauge lines.

However, it should be noted that these journeys are the exception, and DRIFT is capable of (and frequently does) receive W10/12 gauge intermodal trains. As such the business model for DRIFT does not rely on W8 gauge trains, it has simply been able to add W8 gauge services on top of its other services.

In comparison, the OxSRFI will be reliant from the off on investment in specialist and costly trucks and wagons to allow intermodal containers to access the site. Not only this but dropped bed trucks capable of allowing intermodal containers to make use of W8 gauge can only carry half as many containers per truck as a conventional flat bed truck at W10/12 gauge. The combination of these factors reduces the attractiveness of the OxSRFI to customers due to the increased cost associated with overcoming this issue.

If the freight terminal is not attractive to customers and therefore not used, a situation could arise whereby the full warehousing space is occupied but without the benefit of the modal shift provided by the terminal. Without this the need established in the National Policy Statement will not be addressed and any positive weight given to the development could not be used to weigh against harm identified elsewhere within this response.

Given this the Council would suggest an amendment to Requirement 5 of the Draft DCO. The Council would suggest that as well as the requirement to provide the appropriate rail infrastructure and connection to the main line prior to the occupation of more the 232,258 square metres of warehouse (see Section 6 of this response for the Council's comments on the current drafting of this condition), an additional commitment is added to the Grampian that the additional warehousing could not be constructed until evidence has been presented to the LPA that contracts have been agreed which would result in at least 4 trains per day making use of the terminal.

This would ensure that any potential environmental harm from the scheme is limited until the national need for functioning intermodal freight interchanges has been met.

Relevant section in their consultation response relating to pathing

It is clear from the applicants own consultation documents and the National Policy Statement that links to deep seaports are a vital part of an SRFI's ability to viably function.

In the applicant's pathing report it has been indicated 4 possible paths were available from Crewe to the application site. Connections to Crewe have the potential to provide connectivity to Teesport but would be reliant on paths between Teesport and Crewe. Evidence for this has not been provided within the applicant's submitted documentation.

Connections to Felixstowe would also be difficult and do not seem to have been considered a viable option by the applicant as they are not referenced within any of the applicant's consultation material. The logical connection between Felixstowe and Oxfordshire would by the EWR line once this has been completed. The location of the facility on the Chiltern Main Line would make a connection to the EWR line challenging due to the difficulty of connecting the Chiltern Main Line to the Cherwell Valley Line (discussed below).

The closest deep seaport to the application site (and to Oxford) is Southampton. Currently freight from Southampton either moves through Oxfordshire to existing SRFI in the midlands via the Cherwell Valley Line or makes use of HGV's via the A34 and M40.

As the GB Railfreight statement outlines Southampton is only 80 miles from the application site and would logically seem to be the most viable deep seaport to connect to. As previously indicated the Cherwell Valley Line, which runs through Oxfordshire, is the main avenue for rail freight coming from Southampton and would be the obvious route for rail freight from the port to access the County.

Unfortunately, due to the inadequacy of existing rail infrastructure it is not possible for a train heading northbound along the Cherwell Valley Line to easily access the Chiltern Main Line. This includes capacity constraints to the north of Oxford, as well as the need for train reversing movements in the Banbury area that are likely to impact on operations of existing services.

The Council notes that the section of Great Western Mainline between Reading and West Ealing is used extensively by Elizabeth Line services which take up significant capacity on this line. This would result in a bottle neck in the route which is contrary to paragraph 3.93 of the NNNPS and would not result in a 'safe, direct and efficient freight route' which is contrary to paragraph 3.92 of the NNNPS.

The Council therefore think it will present a significant challenge for a freight operator to be able to find regular paths via this route to the OxSRFI which will prevent the OxSRFI from being able to reliably receive freight from Southampton contrary to what is claimed by GB Railfreight at paragraph 54 of their statement.

It is worth noting that the Council has similar concerns around the paths proposed from Wembley which also make use of the Great Western Main Line. This concern is not alleviated by the fact that GB Railfreight have existing trains using these routes which are anticipated to be unnecessary by the time the OxSRFI is operational as there is no certainty that these paths will definitely be allocated to freight traffic to the OxSRFI.

This raises doubt as to the viability of the OxSRFI as it will not be able to receive freight from the closest deep seaport. It also means that the scheme is not likely to result in a significant reduction of HGV traffic along the A34 which means that the County would not directly benefit from the intermodal benefits that could result from an SRFI.

The Council has previously indicated to the applicant that a viable route that would allow regular freight traffic to access OxSRFI could be established by an investment in a run around to the north of Banbury connecting the Cherwell Valley Line to the Chiltern Main Line. This would allow northbound trains on the Cherwell Valley Line to access the Chiltern Main Line without needing to use the Great Western Main Line. Without this investment in additional rail infrastructure the Council does not believe there would be a viable path that would allow the OxSRFI to access the freight market coming out of Southampton.

Given the importance of access to deep sea ports outlined within the NNNPS as well as the applicants own consultation materials, the Council at this stage are concerned that the

OxSRFI would not be an attractive option for freight customers and as such may not result in the modal shift expected to be resultant from a SRFI.

In order to alleviate these concerns the Council would expect the applicant to demonstrate with a degree of certainty that a significant number of the 4 trains expected to use the site could arrive from, and depart to, one of the major deep seaports in a frequent and viable manner.

Given the Council's concerns around the capacity of the Great Western Main Line between Reading and West Ealing, the Council also request that the applicant demonstrate that the SRFI is still able to accommodate 4 trains per day without making use of paths which utilise this route. For example, we would want to see evidence that freight trains could safely and effectively operate along the Cherwell Valley Line and turn around in the Banbury area without impacting on existing services, including understanding any required further rail infrastructure needed to facilitate this, as well as recognising the gauging points noted below.

Relevant section in their consultation response relating to passenger services

Another concern in relation to not only Ardley Station, but also the ability to operate existing and increase passenger services more generally on the Chiltern Main Line, is capacity. Increasing freight services on the Chiltern Main Line would result in reduced capacity for passenger services. OCC's Freight and Logistics Strategy at page 22 outlines that 'Whilst our priority is to support the mode shift of freight to rail, it is important that this does not affect our passenger rail network.' OCC therefore requires robust evidence from the applicant that the provision of 4 return freight paths per day along the Chiltern Main Line will not adversely impact the capacity on the Chiltern Main Line to the point where additional passenger services are not possible.