



DCO Submission

Environmental Statement

Chapter 10: Heritage (built and archaeology)
Appendix 10.7: Built Heritage Impact Assessment

Document 6.10G

On behalf of
Oxfordshire Railfreight Limited

Prepared by Marrons
September 2025

OXFORDSHIRE STRATEGIC RAILFREIGHT INTERCHANGE

BUILT HERITAGE IMPACT ASSESSMENT

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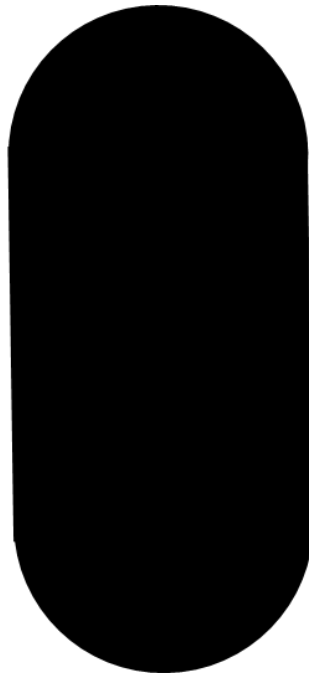
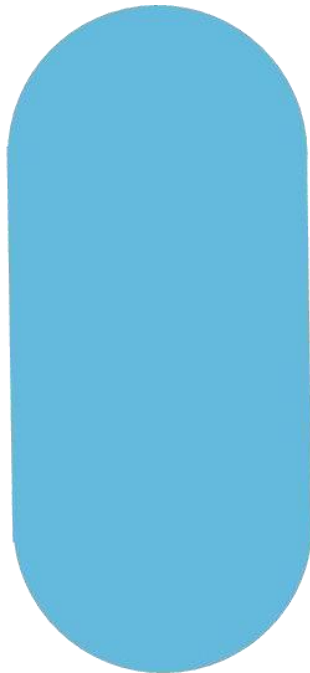




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1 INTRODUCTION

- 1.1 This Built Heritage Impact Assessment has been prepared by Marrons on behalf of Oxfordshire Railfreight Limited to consider the impacts of the proposed Oxfordshire Strategic Railfreight Interchange (OxSRFI) on built heritage assets. The development is located on land west of the B430, east of the former Upper Heyford Airfield, and immediately south of the Chiltern Main Line, to the south of Ardley in Oxfordshire. The Highways Works include land on both the eastern and western sides of M40 Junction 10, hereafter also referred to as the 'Site'. The Site Location Plan for the development is included as part of the DCO application material (Document 2.4). For a further description of the Proposed Development please refer to the Environmental Statement (Chapter 2 – Description of Development and Alternatives).
- 1.2 The author of this report is Hannah Hamilton-Rutter BA(Hons) PGDip MA IHBC. A site visit was made in April 2025 and included a walkover of the Site and publicly accessible locations within the surrounding areas.
- 1.3 This Built Heritage Impact Assessment has been prepared as part of the Stage 2 Consultation and relates to the draft proposals that are being consulted on at this time. The conclusions will therefore be updated to include a full assessment of impact based on the final submission plans in accordance with the requirements of the NPPF and Historic England guidance.
- 1.4 This report should be read in conjunction with the accompanying Built Heritage Assessment of Significance (RPS, 2025) as well as the Illustrative Masterplan and Parameters Plan. This report provides a review of current legislation and policy relevant to built heritage and an assessment of potential impacts on sensitive built heritage assets based on the current proposals.



2 PLANNING CONTEXT

LEGISLATION AND NATIONAL POLICY

- 2.1 There is national legislation, policy and guidance relating to the protection and treatment of the historic environment within the planning process. These identify the historic environment as a non-renewable, fragile, and finite resource and place priority upon its conservation.

LEGISLATION

- 2.2 The Planning (Listed Buildings and Conservation Areas) Act 1990 covers the registration of Listed Buildings (that is those buildings that are seen to be of special architectural or historic interest) and the designation of Conservation Areas (areas of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance).
- 2.3 A Listed Building may not be demolished or altered or extended in any manner which would affect its character as a building of special architectural or historic interest without Listed Building Consent being granted.
- 2.4 There are three grades of listed building (in descending order):
- Grade I: buildings of exceptional interest;
 - Grade II*: particularly important buildings of more than special interest; and
 - Grade II: buildings of special interest, warranting every effort to preserve them.
- 2.5 When making a decision on all listed building consent applications or any decision on a planning application for development that affects a listed building or its setting, a local planning authority must have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. Preservation in this context means not harming the interest in the building, as opposed to keeping it utterly unchanged.
- 2.6 The Act requires local planning authorities to pay special attention throughout the planning process to desirability of preserving or enhancing the character or appearance of a Conservation Area.

NATIONAL PLANNING POLICY

- 2.7 The National Planning Policy Framework (NPPF), published in 2012 and last updated in 2025, sets out the UK Government's requirements for the protection and enhancement of the historic environment, and should be read in conjunction with the accompanying Planning Policy Guidance (PPG).
- 2.8 Paragraph 202 states that heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal Value. These assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.



- 2.9 In determining planning applications, Paragraph 207 requires that local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.
- 2.10 Paragraph 208 states that local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.
- 2.11 Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, Paragraph 214 states that local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:
- a) the nature of the heritage asset prevents all reasonable uses of the site; and
 - b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and
 - c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and
 - d) the harm or loss is outweighed by the benefit of bringing the site back into use.
- 2.12 Paragraph 215 sets out that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.
- 2.13 The effect of an application of the significance of a non-designated heritage asset is considered in Paragraph 216 which states that in weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.



NATIONAL POLICY STATEMENTS

- 2.14 National Policy Statements are produced by central government and comprise the objectives for the development of nationally significant infrastructure in a particular sector and state. The National Networks National Policy Statement (Department for Transport, 2024) provides planning guidance for nationally significant road, rail and strategic rail freight interchange projects.
- 2.15 It is a requirement as set out at paragraph 5.210 that the applicant should undertake an assessment of any significant heritage impacts of the proposed project and describe the significance of any heritage assets affected, including any contribution made by their setting. As a minimum, the Historic Environment Record should have been consulted and the heritage assets assessed using appropriate expertise.
- 2.16 Paragraphs 5.216-5.226 set out the decision-making framework that the Secretary of State should have regard to in relation to heritage assets. This broadly follows the requirements of the NPPF.

LOCAL PLANNING POLICY

- 2.17 Local planning authorities are responsible for implementing the requirements articulated by legislation and the NPPF as regards the protection of the historic environment on a local level, and the formulation of policies to support this obligation. The Site and its environs are located within the jurisdiction of Cherwell District Council which is currently subject to policies set out below.

Adopted Cherwell Local Plan 2011-2031 (adopted July 2015)

- 2.18 The Adopted Cherwell Local Plan 2011-2031 (Part 1) contains strategic planning policies for development and use of land and forms part of the statutory Development Plan for Cherwell. The Plan was formally adopted by the Council on 20th July 2015, with the policy 'Bicester 13' (not relevant to this report) re-adopted on 19th December 2016. Relevant policies relating to the historic environment are as follows.
- 2.19 Policy ESD15: The Character of the built and historic environment, which states that:

'Successful design is founded upon an understanding and respect for an area's unique built, natural and cultural context. New development will be expected to complement and enhance the character of its context through sensitive siting, layout and high quality design. All new development will be required to meet high design standards. Where development is in the vicinity of any of the District's distinctive natural or historic assets, delivering high quality design that complements the asset will be essential.'

New development proposals should:

- *Be designed to deliver high quality safe, attractive, durable and healthy places to live and work in. Development of all scales should be designed to improve the quality and appearance of an area and the way it functions;*
- *Deliver buildings, places and spaces that can adapt to changing social, technological, economic and environmental conditions;*
- *Support the efficient use of land and infrastructure, through appropriate land uses, mix and density/development intensity;*



- *Contribute positively to an area's character and identity by creating or reinforcing local distinctiveness and respecting local topography and landscape features, including skylines, valley floors, significant trees, historic boundaries, landmarks, features or views, in particular within designated landscapes, within the Cherwell Valley and within conservation areas and their setting;*
- *Conserve, sustain and enhance designated and non designated 'heritage assets' (as defined in the NPPF) including buildings, features, archaeology, conservation areas and their settings, and ensure new development is sensitively sited and integrated in accordance with advice in the NPPF and NPPG. Proposals for development that affect non-designated heritage assets will be considered taking account of the scale of any harm or loss and the significance of the heritage asset as set out in the NPPF and NPPG. Regeneration proposals that make sensitive use of heritage assets, particularly where these bring redundant or under used buildings or areas, especially any on English Heritage's [Historic England's] At Risk Register, into appropriate use will be encouraged;*
- *Include information on heritage assets sufficient to assess the potential impact of the proposal on their significance. Where archaeological potential is identified this should include an appropriate desk based assessment and, where necessary, a field evaluation;*
- *Respect the traditional pattern of routes, spaces, blocks, plots, enclosures and the form, scale and massing of buildings. Development should be designed to integrate with existing streets and public spaces, and buildings configured to create clearly defined active public frontages;*
- *Reflect or, in a contemporary design response, re-interpret local distinctiveness, including elements of construction, elevational detailing, windows and doors, building and surfacing materials, mass, scale and colour palette [...]*

[...] The Council will provide more detailed design and historic environment policies in the Local Plan Part 2.'

Adopted Local Plan 1996 (adopted November 1996)

2.20 'Saved' policies of the Adopted Cherwell Local Plan 1996 remain part of the statutory Development Plan until Part 2 is adopted. The saved policies are those that were originally saved on 27th September 2007 and which have not been replaced by policies within the Adopted Cherwell Local Plan 2011-2031 (Part 1). Relevant saved policies relating to the historic environment are as follows.

2.21 Policy C18: Development proposals affecting a Listed Building, which states that:

'In determining an application for listed building consent the council will have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest. The council will formally only approve internal and external alterations or extensions to a listed building which are minor and sympathetic to the architectural and historic character of the building'.

2.22 Policy C21: Proposals for re-use of a listed building, which states that:

'Sympathetic consideration will be given to proposals for the re-use of an unused listed building provided the use is compatible with its character, architectural integrity and setting and does not conflict with other policies in this plan. In exceptional



circumstances other policies may be set aside in order to secure the retention and re-use of such a building’.

- 2.23 Policy C23: Retention of features contributing to character or appearance of a Conservation Area, which states that:

‘There will be a presumption in favour of retaining buildings, wall, trees or other features which make a positive contribution to the character or appearance of a Conservation Area’.

- 2.24 Policy C25: Development Affecting the site or setting of a Scheduled Ancient Monument, which states that:

‘In considering proposals for development which would affect the site or setting of a scheduled ancient monument, other nationally important archaeological sites and monuments of special local importance, the council will have regard to the desirability to maintaining its overall historic character, including its protection, enhancement and preservation where appropriate’.

Neighbourhood Planning

- 2.25 The Site lies largely within the Mid-Cherwell Neighbourhood Area, for which a Neighbourhood Plan was made in May 2019 covering the period 2018-2031. The Mid-Cherwell Neighbourhood Plan (MCNP) contains a number of policies pertaining to the historic built environment, which are reproduced below where relevant. A Heritage and Character Assessment is also contained in Appendix K of the Neighbourhood Plan, which has been referred to is the production of this report.

- 2.26 Policy PD4: Protection of important views and vistas of the MCNP states that:

Development proposals within the plan area must demonstrate sensitivity to the important views and vistas described in Table 4 [see below] and illustrated by photographs in the documents referred to in that Table, by including an assessment of the significance of the views and the effect of the proposed development on them. Proposals which cause significant harm to any of these views will only be acceptable where the benefits of the proposal clearly outweigh any harm.

Development proposals must also be designed such that there is no adverse impact on the sensitive skylines identified in Fig. 8 and referenced in Table 4.

- 2.27 Table 4: Important views and vistas to be protected lists the following:

a. *Views of all church towers in the MCNP area, as seen from numerous viewpoints including those shown in photos referred to in C0 below, and as shown in Fig.8 on p.51 [of the Neighbourhood Plan].*

b. *All the vistas and views referred to in the following CDC Conservation Area Appraisals, or in updated versions of these documents:*

Ardley 2005: para 4.12 and Table p.11-12; church views on p.27

Fewcott 2008: para 6.11 and Fig.7

Duns Tew 2005: Table 1 and Fig.8

Fritwell 2008: Paras. 6.11, 7.11, 8.7, 9.10 and 10.11 and Figs. 12, 13, 14, 15, and 16

Kirtlington 2011: p.33-34, and Fig.13



North Aston 2015: Para 12.2 and Fig.12

RAF Upper Heyford 2006: Para 6.4 and Figs 9,10 and 11

Steeple Aston 2014: Paras. 8.1.3, 8.1.4, 8.2.1 and 8.3.3, p.26 and Fig.14

Rousham 1996 (in course of being updated)

Somerton 1996 (to be updated)

Oxford Canal 2012: para 6.69 - 6.76

- c. *With reference to Appendix K (AECOM Heritage and Character Assessment) [contained within the Neighbourhood Plan], all the vistas and views referred to on p.22, 23, 76, and 90, and those referred to below, together with the relevant photos on those pages:*

Fritwell: p.35; Kirtlington: p.43; Lower Heyford: p.51; Middle Aston: p.57; Steeple Aston: p.65, and Upper Heyford: p.72

NOTE: Part 2 of APPENDIX K [of the Neighbourhood Plan] covers only Category A and B villages and Upper Heyford; other Category C villages were excluded from AECOM's study because of funding limitations affecting the scope of the work.

2.28 Policy PD4: Building and Site Design states that:

New development should be designed to a high standard which responds to the distinctive character of the settlement and reflects the guidelines and principles set out within the Heritage and Character Assessment (see Appendix K). Development proposals should have full regard to the following criteria:

- a. *Proposals should wherever possible include appropriate landscape mitigation measures to reduce the impact of the built form, to ensure that development is in keeping with the existing rural character of the village, and to provide a net gain in biodiversity.*
- b. *Development affecting existing traditional stone walls should identify them on proposals drawings, and wherever possible retain and/or repair them using traditional forms and materials.*
- c. *Proposals for minor development schemes (excluding infill and conversions) of new housing will be required to provide new or improve existing footpaths and cycle ways to ensure that new residents of all ages and mobility have safe access to village amenities such as the school, bus stops, shop and green spaces. Where new routes are proposed to meet this requirement, the development proposals shall contain full details of all associated materials and infrastructure.*
- d. *The section on Managing Change on p.76 -77 of the Heritage and Character Assessment (see Appendix K), which sets out general principles and specific recommendations for villages highlighted in the document.*

Note 1: This policy does not apply to development within the area covered by CDC's policy Villages 5, where site-specific design and place-shaping standards are already set out.



Note 2: Part 2 of Appendix K covers only Category A and B villages and Upper Heyford; other Category C villages were excluded from AECOM's study because of funding limitations affecting the scope of work.

2.29 Policy PD6 Control of Light Pollution states that:

The design of external and street lighting in all new development should minimise the risk of light spillage beyond the development site boundary. Proposals should ensure that the installation of all external lighting satisfies the following criteria:

- a. Elevations of buildings, particularly roofs, should be designed to limit light spill;*
- b. Proposals should not have a detrimental effect on the amenity of surrounding occupiers;*
- c. Proposals should not have a significant adverse impact on the character of a village and its setting or of the wider countryside;*
- d. Proposals should not be detrimental to an area of nature conservation interest;*
- e. Particular care should be taken to avoid light pollution where the development is in a remote rural location, or where it might adversely affecting the setting of the Oxford Canal.*



3 NATURE OF POTENTIAL IMPACTS

INTRODUCTION

- 3.1 The following section provides an assessment of the potential impacts that could arise to the identified sensitive heritage assets as a result of the proposed development of the Site. This is based on the draft proposals that are being consulted on during the Stage 2 Consultation and the assessments refer to the Parameters Plan and Illustrative Masterplan. The conclusions will therefore be updated to include a full assessment of impact based on the final submission plans in accordance with the requirements of the NPPF and Historic England guidance.
- 3.2 The impact assessments below refer to the baseline set out in the Built Heritage Assessment of Significance (RPS, 2025). As part of the preparation of this report, the assessments within the RPS report were reviewed and a site visit was carried out in April 2025. No changes were observed within the Site or to the identified heritage assets and their settings that materially affect the baseline assessments within the RPS report. Additionally, no further designated or non-designated heritage assets beyond those identified in the RPS report were identified as being sensitive to the development of the Site.

PROPOSALS

- 3.3 The proposed development of the Site is for an intermodal rail freight terminal, large scale warehouse space and associated works. The main components of the scheme are summarised below:
- A rail freight terminal providing connections and improvements to the Chiltern Main Line and including rail sidings, container storage and HGV parking;
 - Up to 603,850 sqm of warehousing and ancillary buildings;
 - Retention, rejuvenation and reuse of Ashgrove Farm and associated buildings as part of a central hub providing estate management, training and communal facilities serving the Site;
 - Secure HGV parking;
 - New road infrastructure and works to the existing road network including improvements to junctions on the M40 and A43, a bypass to Ardley and a relief road around Middleton Stoney;
 - New and improved pedestrian and cycle infrastructure; and
 - Retention of key landscape features with new strategic landscaping, general planting and biodiversity enhancements.
- 3.4 The approach to the development shown in the Stage 2 Consultation has been informed by ongoing stakeholder engagement, principally with the Conservation Officer at Cherwell District Council and Historic England. Their respective comments as part of the Stage 1 Consultation focused on the potential impacts of the scheme on the RAF Upper Heyford Conservation Area, particularly on the view beyond the airfield from the eastern section of the runway. This has been addressed in the current



proposals through the proposed treatment of the landscape bunding and planting in this location, with alterations to the design meaning that a more open view aligned with the runway is maintained.

- 3.5 In respect of the proposed use of Ashgrove Farm as a central hub, discussions with Cherwell District Council have confirmed that all buildings of historic interest within the complex will be retained and converted to appropriate uses.

NATURE OF POTENTIAL IMPACT

- 3.6 The heritage assets identified as being sensitive to the proposed development are as follows:
- Barn approximately 40 meters north of Ashgrove Farmhouse (Grade II Listed Building, NHLE: 1046879);
 - Ashgrove Farm (non-designated heritage asset, HER ref: MOX27753);
 - Trow Pool Water Tower (Grade II Listed Building, NHLE: 1389392);
 - Troy Farmhouse (Grade II Listed Building, NHLE: 1225639);
 - Lodge Farmhouse (Grade II Listed Building, NHLE: 1200299);
 - Middleton Park Registered Park & Garden (Grade II, NHLE: 1001405);
 - Ardley Conservation Area; and
 - RAF Upper Heyford Conservation Area.

BARN APPROXIMATELY 40 METRES NORTH OF ASHGROVE FARMHOUSE (GRADE II LISTED BUILDING)

- 3.7 The Barn is proposed to be retained as part of the proposals, forming part of the central hub located at Ashgrove Farm which will be developed to provide a range of uses associated with the operation of the OxSRFI site (Zone D). The Barn itself is in an extremely poor state of repair and it is proposed to retain and reuse historic fabric where possible, introducing appropriate new materials where required to support the retention and longevity of the structure. This approach is set out in the accompanying Design Approach Document for Ashgrove Farm (Donald Insall Associates, 2025).
- 3.8 The proposed development therefore allows for the restoration and retention of the barn, as well as providing a sustainable future use for the structure within the wider scheme. The redevelopment of the wider Ashgrove Farm complex (non-designated heritage asset) will also maintain and protect this aspect of the Barn's setting which has been established to positively contribute to its heritage significance.
- 3.9 However, it is acknowledged that the proposed development would fundamentally alter the wider setting of the Barn which makes an important, albeit secondary, contribution to its significance. The rural, agricultural qualities of its surrounding landscape which reflects and supports an understanding of the historic farming operation of the Barn and associated farmstead would be lost and it would be seen within a built, urbanised setting derived principally from the operation of the adjacent warehouses. This would



detract from the ability to appreciate the asset's historic and architectural interest as an early building within the present farmstead.

- 3.10 The proposed mitigation shown within the development could reduce the impact of the scheme on the significance of the Barn. This includes planting around the retained curtilage of the farmstead which would soften and filter views of the buildings beyond. Additionally, extensive areas of open space are proposed between the farmstead and the B430 to the east. These elements would assist with maintaining a relatively open immediate setting to the farmstead and an appreciation of the group value between the farm buildings. The orientation of the buildings themselves in addition to the creation of ancillary areas such as service yards and parking away from the areas immediately adjacent to the farmstead as shown by the Illustrative Masterplan would also reduce the urbanising effects of the development; these would be experienced beyond this immediate area allowing the Barn to be principally understood within its farmstead setting.
- 3.11 The proposed development of the Site would likely result in less than substantial harm to the listed Barn. However, this would be balanced against the public benefits provided by the scheme in accordance with paragraph 215 of the NPPF; these include direct heritage benefits in respect of restoration works to the Barn. The level of impact could also be meaningfully mitigated through the retention of the wider farmstead which forms an important element of the Barn's setting, the proposed conversion of the farm complex to fulfil a sustainable future use and the design approach to the wider development in relation to landscaping and layout.
- 3.12 The proposed overarching approach to the repair of the listed Barn alongside the redevelopment of Ashgrove Farm is set out in the Design Approach Document for Ashgrove Farm (Donald Insall Associates, 2025). This provides a high level framework and establishes key principles for the development of this area of the Site which more detailed proposals as to specific uses for each building and the extent of works would have regard to as part of a subsequent detailed development stage.

ASHGROVE FARM (NON-DESIGNATED HERITAGE ASSET)

- 3.13 The proposed development includes the retention of all pre-twentieth century buildings at Ashgrove Farm, including the outlying model cottages adjacent to the B430, within Zone D. They would be converted to new uses associated with the wider development which would also be a positive aspect of the proposal, particularly with regard to maintaining the buildings' role within the setting of the listed Barn. Modern agricultural buildings of no heritage interest would be demolished; this would not affect the local, limited significance of the farmstead.
- 3.14 As with the listed Barn, the development would result in the introduction of modern built forms and infrastructure within the present wider agricultural setting of Ashgrove Farm which makes a contribution to the ability to appreciate its heritage significance. The mature planting around the farmstead alongside the retention of open space to the central and eastern areas of Zone D would reduce the visual impact of the development as understood from the farm to some extent. A rail corridor is also proposed to be introduced at the eastern end of Zone D between the principal area of the farm complex and the model cottages; this would somewhat divorce the cottages



from the wider farmstead although the impact of the railway line could be reduced through the proposed landscape treatment along its route.

- 3.15 It is considered that the proposed development would result in harm to the significance of Ashgrove Farm as a non-designated heritage asset through the loss of its present rural, agricultural settings which contributes to the understanding of its heritage significance. However, this impact would be reduced through the informed approach to the masterplanning of the Site and would be balanced against the wider public benefits delivered by the scheme, including the specific heritage benefits relating to Ashgrove Farm.
- 3.16 As set out above, the proposed overarching approach to the repair of the listed Barn alongside the redevelopment of Ashgrove Farm is set out in the Design Approach Document for Ashgrove Farm (Donald Insall Associates, 2025).

TROW POOL WATER TOWER (GRADE II LISTED BUILDING)

- 3.17 It has been established that there are some incidental and occasional views of the Water Tower from southern parts of the Site to the eastern side of the B430. As shown by the Illustrative Masterplan, these views are unlikely to be affected by the development. As such, there will be no harm to the significance of Trow Pool Water Tower.

TROY FARMHOUSE (GRADE II LISTED BUILDING)

- 3.18 Troy Farm is situated to the north-west of the Site. The proposed development would result in the introduction of built development within the wider setting of Troy Farmhouse. However, as shown by the Illustrative Masterplan, this would be experienced only distantly beyond the intervening fields as well as the existing railway line and RAF Upper Heyford which have previously fundamentally changed the historic rural context of Troy Farmhouse. Works to the rail corridor would be limited to the existing route of the railway line which is significantly lower than the surrounding ground. In return views from the Site, whilst the farmhouse is visible from within the north-western area, these are glimpsed, incidental views which make no meaningful contribution to its significance.
- 3.19 The treatment of the rail corridor and the approach to the positioning of the buildings as well as the landscaping strategy would provide some mitigation against the impact from the development on Troy Farmhouse. As such, the proposed development is likely to result in a low level of less than substantial harm to Troy Farmhouse as a result of the further development of its wider setting.

LODGE FARMHOUSE (GRADE II LISTED BUILDING)

- 3.20 Lodge Farm is located to the east of the area of the Site within which the Middleton Stone Relief Road is proposed to be constructed. It is not anticipated that any other aspect of the proposed development has the potential to affect its significance.
- 3.21 The construction of the relief road would result in the loss of part of the present rural and agricultural character of the setting of Lodge Farmhouse which makes a positive contribution to the appreciation of its heritage significance. However, these qualities as experienced within the setting of the Listed Building have been previously weakened as a result of the audible presence of the M40. Mitigation against the visual



and audible impact of the proposed relief road could be provided through the treatment of the road and associated landscaping. As such, the proposed relief road has the potential to cause less than substantial harm to the significance of Lodge Farmhouse through the loss of aspects of its setting which currently make a positive contribution, but this is anticipated to be towards the lower end.

MIDDLETON PARK (GRADE II REGISTERED PARK & GARDEN)

- 3.22 The proposed development of the Site would result in the reduction of the wider rural landscape of Middleton Park through both the provision of the proposed warehouses and the associated infrastructure. However, a significant area of intervening agricultural land would remain between the Registered Park and the main area of development. The provision of substantial bunding and planting to the south of the proposed built form in addition to retained open areas at the southern extent of the main area of the Site for ponds and wetland features also further reduces the likely visibility of the development to the north of the Registered Park. Further mitigation could be implemented through the approach to the design of the building form and the layout of the Site. There is unlikely to be any visibility of the proposed development from the park itself, with any perception of the proposed development understood from the areas immediately surrounding the parkland.
- 3.23 It is therefore considered that the potential impacts arising from the proposed development on Middleton Park are likely to be at the low end of less than substantial harm.

ARDLEY CONSERVATION AREA

- 3.24 The proposed works to the railway line, introduction of warehouses to the south of Ardley Conservation Area and the construction of the bypass to the east have the potential to cause less than substantial harm to its significance. This would arise through the loss of the rural hinterland to the east and south of the settlement which makes a contribution to its appreciation as a historic agricultural settlement.
- 3.25 However, informed mitigation could be implemented along the route of the proposed bypass to the east and to the existing railway corridor to the south of the village. This part of the setting of the Conservation Area in particular has previously undergone a shift from rural farmland to more developed characters through the construction of the railway line and the establishment of RAF Upper Heyford. As such, the proposed warehouses would be seen as part of this more urbanised wider setting of the Conservation Area, beyond the intervening fields between the Conservation Area and the railway line.
- 3.26 The immediate undeveloped surroundings of the Conservation Area would not be affected and it would continue to be experienced as a distinct rural settlement. The limited opportunities for intervisibility with its setting from the main route through the village also reduces the potential impact from the proposed development. The proposed development to the east and south of the Conservation Area would also be visually and functionally assimilated into the more developed character already established within the wider surroundings of Ardley, including the railway infrastructure and highway network. As such, the proposed development is likely to result in a low level of less than substantial harm to the Conservation Area.



RAF UPPER HEYFORD CONSERVATION AREA

- 3.27 The proposed development by virtue of its location adjacent to the RAF Upper Heyford Conservation Area would result in a change of a substantial area of the present rural, open setting at its eastern end. However, it has been established that the airbase was intended to be insular and inward facing, largely turning away from its wider surroundings. As such, its setting makes only a limited contribution to the ability to appreciate its heritage significance.
- 3.28 The views of the Conservation Area from the area of the Site that wraps around its eastern end would likely be lost. However, this would have no meaningful impact on the overall ability to appreciate its significance due to their limited nature. The development would also be seen within the context of the modern development that already extends along the southern and south-eastern side of the airbase which has eroded a full appreciation of its historic isolated location.
- 3.29 In views outwards from the Conservation Area, some limited partial glimpses of the development are anticipated. These would be substantially reduced by the intervening landscape treatment along this boundary of the Site which would include bunding and planting. The proposed layout as shown by the Illustrative Masterplan would also assist in minimising impacts of the development as understood from within the Conservation Area with service yards and areas of greater activity located away from the boundary.
- 3.30 As discussed during consultation with Historic England and the Conservation Officer, the view east from the eastern end of the runway is considered to positively contribute to the character and appearance of the Conservation Area. The ends of the runways would have been kept deliberately clear of development to facilitate safe landings and take-offs and its present open prospect provides some understanding of how the runway would have been experienced historically. As such, the visual impact of the development on this view and the perception of development beyond is proposed to be minimised through the approach to the treatment of the structural landscaping and planting to the Site boundary which will maintain a greater sense of openness at the end of the runway. Additionally, the area of the Site directly adjacent to the end of the runway will be absent of warehouse development, instead containing the intermodal rail terminal which has a more permeable and open quality. There are anticipated to be some limited visual changes to the view east from the end of the runway through the presence of containers and the operation of infrastructure associated with the rail terminal. However, the movement of these elements means they will not be static features and the more functional, utilitarian character of the terminal would not be incongruous within the wider character of the airbase.
- 3.31 As such, it is considered that with the incorporation of mitigation measures, the level of harm to the significance of the RAF Upper Heyford Conservation Area would be towards the lower end of less than substantial.

SUMMARY OF IMPACTS

- 3.32 The proposed development has the potential to result in varying levels of less than substantial harm to the Barn at Ashgrove Farm, Troy Farmhouse, Lodge Farmhouse, Middleton Park and the Conservation Areas at Ardley and RAF Upper Heyford. There



will also be some harm to the non-designated Ashgrove Farm. No impact is anticipated to Trow Pool Water Tower.

- 3.33 As such, paragraphs 215 and 216 of the NPPF will be engaged whereby the harm arising from the development on the significance of the identified designated and non-designated heritage assets will be considered within the wider planning balance. With respect to designated heritage assets, the level of less than substantial harm will be balanced against the public benefits delivered by the scheme which include a number of direct heritage benefits.



4 CONCLUSIONS

- 4.1 This Built Heritage Impact Assessment has been prepared by Marrons on behalf of Oxfordshire Railfreight Limited to consider the impacts of the proposed Oxfordshire Strategic Railfreight Interchange (OxSRFI) on built heritage assets.
- 4.2 It should be read in conjunction with the baseline assessment of sensitive built heritage assets set out in the Built Heritage Assessment of Significance (RPS, 2025).
- 4.3 As established above, the built heritage assets with the potential to be affected by the proposed development are:
- Barn approximately 40 meters north of Ashgrove Farmhouse (Grade II Listed Building, NHLE: 1046879);
 - Ashgrove Farm (non-designated heritage asset, HER ref: MOX27753);
 - Trow Pool Water Tower (Grade II Listed Building, NHLE: 1389392);
 - Troy Farmhouse (Grade II Listed Building, NHLE: 1225639);
 - Lodge Farmhouse (Grade II Listed Building, NHLE: 1200299);
 - Middleton Park Registered Park & Garden (Grade II, NHLE: 1001405);
 - Ardley Conservation Area; and
 - RAF Upper Heyford Conservation Area.
- 4.4 The draft plans show the proposed approach to the development of the Site which has responded to identified heritage sensitivities. The proposed development has the potential to result in varying levels of less than substantial harm to the Barn at Ashgrove Farm, Troy Farmhouse, Lodge Farmhouse, Middleton Park and the Conservation Areas at Ardley and RAF Upper Heyford. There will also be some harm to the non-designated Ashgrove Farm. No impact is anticipated to Trow Pool Water Tower.
- 4.5 As such, paragraphs 215 and 216 of the NPPF will be engaged whereby the harm arising from the development on the significance of the identified designated and non-designated heritage assets will be considered within the wider planning balance. With respect to designated heritage assets, the level of less than substantial harm will be balanced against the public benefits delivered by the scheme which include a number of direct heritage benefits.
- 4.6 The proposed development is yet to be finalised and the draft assessments of impact contained within this report will be updated to accompany the planning application in accordance with the NPPF and Historic England guidance.



5 REFERENCES

- English Heritage. (2008). *Conservation Principles, Policies and Guidance*. English Heritage.
- Historic England. (2015). *Management of Research Projects in the Historic Environment*. Historic England.
- Historic England. (2015). *Managing Significance in Decision-Taking in the Historic Environment: Historic Environment Good Practice Advice in Planning: 2*. Historic England.
- Historic England. (2017). *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning: 3*. Historic England.

