



## DCO Submission

### Equality Impact Assessment

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Rev A

On behalf of  
**Oxfordshire Railfreight Limited**

Prepared by GC Insight  
**May 2026**

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**Oxfordshire Strategic Rail Freight  
Infrastructure (OxSRFI) Equality Impact  
Assessment**

Prepared for Oxfordshire Railfreight Ltd  
May 2026



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## Contents

<b>1</b>	<b>Introduction</b>	<b>1</b>
<b>2</b>	<b>Site and Proposed Development</b>	<b>3</b>
<b>3</b>	<b>Policy Context and Area Profile</b>	<b>6</b>
<b>4</b>	<b>Assessment</b>	<b>14</b>
<b>5</b>	<b>Conclusions and Recommendations</b>	<b>24</b>

# 1 Introduction

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- 1.1 This Equality Impact Assessment (EqIA) has been prepared by GC Insight on behalf of Oxfordshire Railfreight Ltd ('the Applicant') to support the application for a Development Consent Order (DCO) for the development of a Strategic Rail Freight Interchange (the 'Proposed Development'), adjacent to the Chiltern Railway line, and close to Junction 10 of the M40 in Cherwell District, Oxfordshire (hereafter referred to as 'the Main Site').
- 1.2 The purpose of the EqIA is to help the Secretary of State for Transport as decision maker for the DCO application understand the potential impacts of the Proposed Development on people with characteristics protected under the Equality Act 2010<sup>1</sup>, in order to comply with their Public Sector Equality Duty (PSED). These characteristics include age, disability, gender reassignment, marriage and civil partnerships, pregnancy and maternity, race, religion and belief, sex and sexual orientation.
- 1.3 This report outlines the findings of the EqIA and provides recommendations for mitigation and further enhancement where appropriate and should be read in conjunction with other application documents including the Main Site Design Approach Document (Document 5.5A), the relevant Environmental Statement (ES) Chapters, and relevant ES Appendices, such as the Construction Environmental Management Plan (CEMP, ES Appendix 2.3).

## Approach to the EqIA

- 1.4 There is very limited guidance on carrying out Equality Impact Assessments in the UK, particularly in relation to individual developments rather than assessment of policies. The approach to undertaking this EqIA is therefore based on an understanding of the Equality Act 2010, particularly Section 149 regarding the PSED, as well as GC Insight's professional expertise and in-house approach to conducting EqIAs. It has followed three key stages:
- **Desk-based Review:** including a review of relevant national, regional and local policies and legislation, DCO application documents and primary and secondary datasets relating to groups with protected characteristics;
  - **Assessment of Potential Impacts:** informed by consideration of the policy context, equalities baseline data and taking in to account the sensitivity of the affected parties to the Proposed Development and the distribution of people with protected characteristics; and
  - **Summary of impacts and recommendations:** setting out the potential impacts on people with characteristics protected by the Equality Act and based on this, any recommendations.

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<sup>1</sup> Government Equalities Office/Home Office (2010) 'Equality Act 2010' Available at [www.legislation.gov.uk](http://www.legislation.gov.uk)

- 1.5 The assessment of the potential impacts is predominantly qualitative and outlines the nature of the impact on existing residents and workers living in the area and workers/users of the Proposed Development. It is limited to those aspects of the scheme that affects people and considers impacts on relevant receptor groups rather than individual cases.
- 1.6 Types of equality effects considered are either differential or disproportionate, defined as:
- Differential effects occur where people with protected characteristics are likely to be affected in a different way to other members of the general population. This may be because groups have specific needs or are more susceptible to the effect due to their protected characteristics. Differential effects are not dependent on the number of people affected. For example, in a project where vehicle parking arrangements are reconfigured and there are changes to the pedestrian realm resulting in greater walking distances between parking areas and building entrances, people with physical disabilities may experience a greater adverse effect than non-disabled people.
  - Disproportionate effects occur where there is likely to be a comparatively greater effect on people from a particular protected characteristic group than on other members of the general population. Disproportionate effects may occur if the affected community comprises of a higher-than-average proportion of people with particular characteristics, or because people from a particular protected characteristic group are primary users of the affected resource. For example, for a project that results in the loss of a local health centre, the older population would be disproportionately affected.
- 1.7 The assessment considers where possible and applicable whether the Proposed Development will have a **positive**, **neutral** or **negative** effect amongst the population groups affected, taking into account the duration, frequency and permanence of impacts, the likely severity of impact and the capacity of affected groups to absorb impacts (their resilience).

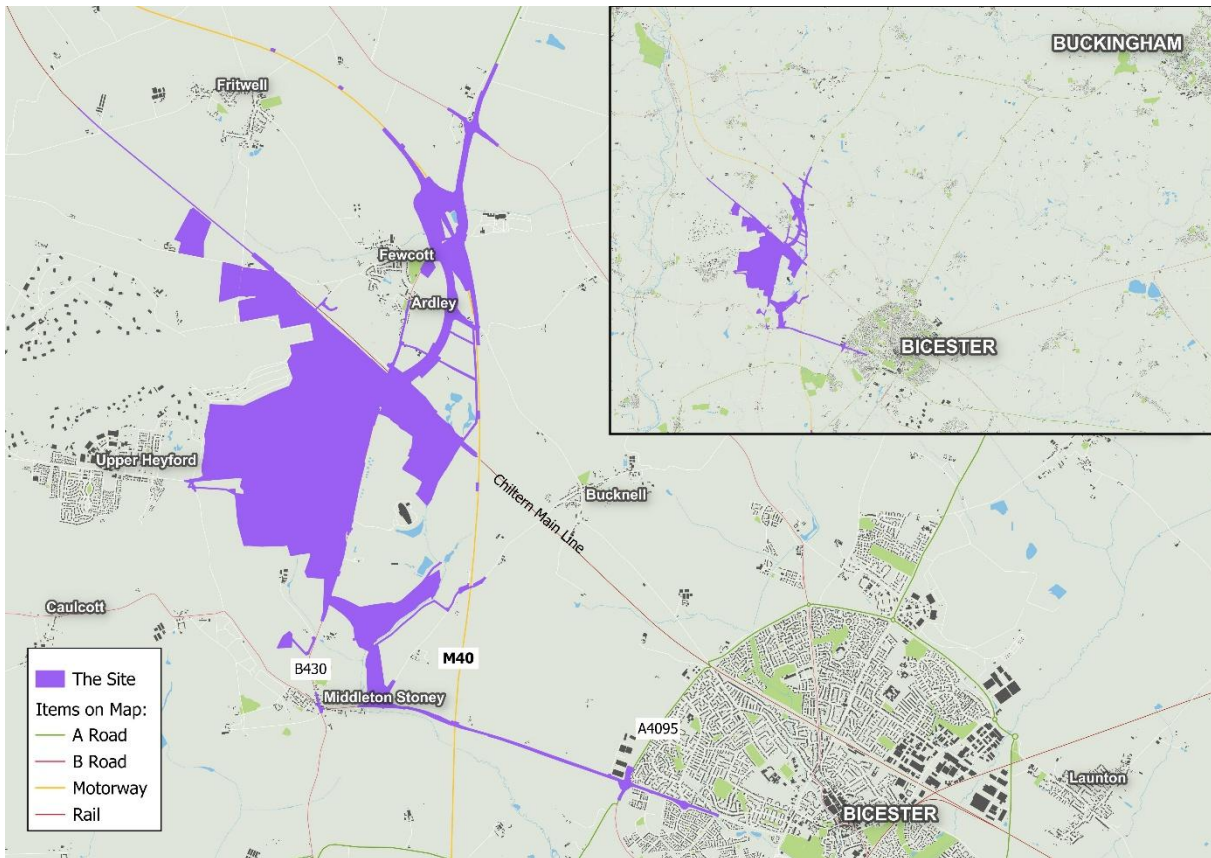
## 2 Site and Proposed Development

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### The Main Site

- 2.1 The Main Site is located between the B430 and the former Upper Heyford Airfield, which is located to the west. It is immediately south of the Chiltern Railway line and southwest of Junction 10 of the M40 motorway. It predominantly consists of agricultural land used for mixed arable and grazing purposes and includes the Ashgrove farmstead (“Ashgrove Farm”) which comprises a number of farm buildings and residences. The farmstead includes a listed building.
- 2.2 The Main Site also accommodates a Biffa operated ‘In-Vessel Composting’ (IVC) facility which is an operational commercial food and garden waste composting facility. The IVC Facility lease finishes in 2030 and the operator will vacate the site at that time if the OxSRFI scheme has been approved. The operations would cease on-site and buildings and structures would be demolished as part of delivering OxSRFI. To the east, beyond the B430, are the Viridor Ardley Energy Recovery Facility, Ardley Fields Waste and Recycling facility, and Ardley Landfill Site, with Dewars Farm minerals quarry to the south.
- 2.3 Ardley and Middleton Stoney villages lie to the north and south of the Main Site respectively, separated by agricultural land and woodland. The M40 motorway is nearby, with Bicester to the southeast. Highways Works involve land around M40 Junction 10, including the Padbury Brook, and the Ardley Bypass crosses several field boundaries and the Chiltern Railway line. The Middleton Stoney Relief Road also includes agricultural land and woodland.
- 2.4 Please refer to the Site Location Plan (Document 2.4) for more details about the Application Site boundaries.

Figure 1. Map of Site



## The Proposed Development

- 2.5 The Proposed Development comprises a Strategic Rail Freight Interchange (SRFI) incorporating a new intermodal rail terminal with direct connections to the Chiltern Main Line, part of the Strategic Rail Freight Network. The terminal will facilitate efficient freight transfer between rail and road and include dedicated container storage areas.
- 2.6 The scheme allows for up to **603,850 sqm** (approximately 6.5 million square feet) of warehousing, including ancillary office space, with provision for an additional **201,283 sqm** of mezzanine floorspace. Building heights will reach up to 25.5 metres, but will vary across the Main Site.
- 2.7 A **Central Hub** will incorporate **Ashgrove Farm**, including the retained **Grade II listed Threshing Barn**, which will be sensitively repurposed for estate management and other ancillary functions associated with the development.
- 2.8 A comprehensive package of **highway improvements and new infrastructure** is proposed to support connectivity and manage traffic impacts. This includes:
- Upgrades to **Junction 10 of the M40**, with new slip roads and enhancements to the A43;

- A new Ardley Bypass, routed to the east of the village;
- A Heyford Park Link Road, connecting Camp Road to the B430;
- A Middleton Stoney Relief Road, bypassing the village to the northeast and linking the B430 with the B4030..

2.9 **Access to the Main Site** will be provided via:

- A primary access from a new roundabout on the B430, accommodating all HGV and car movements;
- A secondary access from the Heyford Park Link Road, reserved for buses, cyclists, pedestrians, and emergency vehicles.

2.10 The Proposed Development includes a strong focus on **landscape integration and green infrastructure**. With over 50% of the Main Site dedicated as landscape green space. The strategy includes retention of mature woodland, trees, and existing habitats, alongside extensive new planting of native species, conservation grassland, and strategic mounding (up to 10 metres high in some locations) to screen views and enhance biodiversity. Sustainable drainage features, such as swales and ponds, will be incorporated throughout the site, supporting water management, ecological value, and amenity.

2.11 A network of **new public access routes** will provide circular, multi-user paths within and around the site, linking to existing Public Rights of Way and offering new connections to **Bicester** and neighbouring communities.

2.12 Development will be brought forward in accordance with fixed parameters secured through the Parameters Plan (Document 2.5) and DCO, which define the spatial extent, uses, and design principles. The detailed layout and number of buildings will be determined at a later stage, in accordance with these parameters and other DCO requirements.

## 3 Policy Context and Area Profile

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### National Policy

#### National Networks National Policy Statement (2024)

3.1 The National Networks National Policy Statement (NPS) (in particular, see paragraphs 4.73 to 4.78) addresses equality through its commitment to inclusive access and socio-economic considerations within infrastructure planning. The NPS asserts that nationally significant road and rail projects must consider accessibility for all users including those with disabilities and other mobility challenges. It requires schemes to comply with equality legislation, such as the Equality Act 2010, ensuring that developments do not discriminate and actively promote equal access to transport networks. It highlights that infrastructure projects should consider impacts on vulnerable groups and should incorporate good design which is inclusive by default.

#### National Planning Policy Framework (2024)

3.2 The National Planning Policy Framework (NPPF) was adopted in December 2024. It articulates the Government's economic, environmental and social planning policies for England and describes how these are expected to be applied and provides overarching guidance on the Government's development aims. There is no specific guidance on equalities within the NPPF, however, it does emphasise the importance of sustainable development and the need to support a healthy and just society. It identifies key principles that local planning authorities should ensure they consider, including:

- Local strategies to improve health, social and cultural wellbeing for all;
- The delivery of sufficient community and cultural facilities and services to meet local needs; and
- The requirement to plan for the needs of different groups within communities.

3.3 The framework states that strategic policy should set out an overall strategy for the pattern, scale and design quality of places and make sufficient provision for infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat). Policies should anticipate and respond to long-term requirements and opportunities, such as those arising from major developments in infrastructure.

3.4 In December 2025, the Government published the new draft NPPF for consultation which includes Plan Making Policy HC1: "Planning for healthy communities" which aims to address inequalities in community facilities and public service infrastructure.

## Oxfordshire Policy

### Including Everyone – Equalities, Diversity and Inclusion (EDI) Framework 2025-2029, (2024)

3.5 Oxfordshire Country Council recently published an update on their EDI framework which is used to measure the council's work with their employees and within their workspaces as well as their work with the communities in Oxfordshire. The vision of this framework is to lead the way in creating a fair and inclusive Oxfordshire by building an inclusive workplace culture, delivering inclusive services, and tackling disadvantage in the communities Oxfordshire serves. The framework has 3 ambitions:

- **Inclusive communities:** involves working with communities to help them thrive
- **Inclusive service delivery:** involves encouraging partners to have accessible buildings and information and communicating with residents to plan and meet their diverse needs.
- **Inclusive workplace:** involves making sure Oxfordshire's working culture is inclusive and employee demographics reflect the diversity of the communities they serve, as well as ensuring colleagues have the values, skills and knowledge they need to include everyone.

## Local Policy

### Including Everyone Framework – Cherwell Council (2020)

3.6 In 2020, Cherwell District Council introduced its Including Everyone Framework, which outlines the council's approach to EDI. The framework sets out a vision for delivering inclusive services, creating equitable access and opportunities, and fostering diverse and supportive workplaces and communities. Primarily, the framework is intended to guide the council's internal policies and procedures. It enables the council to assess the impact of budgetary or service changes on protected characteristic groups and to mitigate negative impacts wherever possible. While the framework is not directly aimed at developments consented through planning permissions and DCOs, it does reflect the council's broader commitment to inclusion across Cherwell's communities, particularly within shared places and spaces. They also recommend for further action to drive equality that the following groups will be considered when evaluating the impact on their decisions:

- People living in deprived areas
- People in rural communities
- People leaving care
- Carers
- Members of the Armed Forces community

## **Cherwell Local Plan 2011-2031**

- 3.7 The **Cherwell Local Plan 2011–2031 Part 1**, adopted in July 2015, forms part of the Development Plan and statutory framework for the determination of planning applications and DCO applications. It promotes delivery of growth that supports inclusive, accessible, and sustainable communities.
- 3.8 Aligned with the **Sustainable Community Strategy**, the Plan prioritises:
- Creating safe, strong, and inclusive communities;
  - Reducing inequality and deprivation;
  - Responding to an ageing population and enabling independent living;
  - Ensuring all residents feel safe, supported, and welcome, regardless of personal circumstances;
  - Supporting young people with skills and opportunities.
- 3.9 Key policies relevant to equality and inclusion include:

### **Strategic Objective SO10**

Commits to delivering accessible, good-quality services and infrastructure—including health, education, transport, open space, and community facilities—to **reduce social exclusion** and **address inequalities**.

### **Policy BSC 8: Securing Health and Well-Being**

- Supports timely delivery of health infrastructure aligned with strategic growth;
- Requires developer contributions to meet the needs of growing populations;
- Aims to **reduce health inequalities** through improved access to care.

### **Policy BSC 9: Public Services and Utilities**

- Ensures coordinated delivery of essential services and utilities;
- Requires contributions to support public infrastructure;
- Promotes equitable access to core services for all community groups.

## **Area Profile**

- 3.10 This section outlines the equalities baseline relevant to the Proposed Development. This primarily includes analysis of Census 2021 data. Data has been presented at 3 geographic levels relevant to the Site. These are, the Cherwell Local Authority District, Oxfordshire and England.

## Age

3.11 Table 3.1 presents the age structure of the population across Cherwell, Oxfordshire and England. The data shows that 64% of Cherwell's population are of working age, which is comparable to Oxfordshire (64%) and England (63%). The proportion of people aged 15 and under and people aged 65 and over in Cherwell is also broadly in line with the Oxfordshire and national averages.

**Table 3.1 Age Breakdown (%) by Geographical Area**

	Cherwell	Oxfordshire	England
0-15	19%	18%	19%
16-64	64%	64%	63%
65 +	17%	18%	18%

Source: ONS Census, 2021

## Disability

3.12 **Table 3.2** presents the breakdown of people with disabilities in the Cherwell, Oxfordshire and England benchmark areas. Both Cherwell and Oxfordshire have a relatively low proportion of people who are classed as disabled under the equality act (14.5%) than nationally (17.3%). Of those that are disabled in Cherwell, 5.4% have a disability that limits their day-to-day activities a lot, which is slightly higher than for Oxfordshire (5.1%) but lower than for England (7.3%). , both Cherwell and Oxfordshire have a higher proportion of people with a long-term health condition compared to nationally.

**Table 3.2. Limiting Long-term Illness or Disability (%) by Geographical Area**

	Cherwell	Oxfordshire	England
Disabled under the Equality Act	14.5%	14.5%	17.3%
Disabled under the Equality Act: Day-to-day activities limited a lot	5.4%	5.1%	7.3%
Disabled under the Equality Act: Day-to-day activities limited a little	9.2%	9.4%	10%
Not disabled under the Equality Act	85.5%	85.5%	82.7%
Not disabled under the Equality Act: Has long term physical or mental health condition but day-to-day activities are not limited	7.6%	7.9%	6.8%
Not disabled under the Equality Act: No long term physical or mental health conditions	77.9%	77.6%	75.9%

Source: ONS Census, 2021

## Gender Reassignment

3.13 Until the 2021 census, there were no official statistics referring to gender reassignment as previous census data only collected data based on sex (gender assigned at birth). The 2021 census included an optional question of 'Is the gender you identify with the same as your sex registered at birth?'

3.14 **Table 3.3** shows that across all 3 geographies, the vast majority of people still identify with the same sex they were assigned at birth, ranging from 93% to 94%. In Cherwell,

approximately 0.5% of the population identified with a gender identity different to the sex they were assigned at birth, in line with across Oxfordshire (0.6%) and England (0.5%).

**Table 3.3 Gender Identity (%) by Geographical Area**

	Cherwell	Oxfordshire	England
Gender identity the same as sex registered at birth	94.1%	93.3%	93.5%
Gender identity different from sex registered at birth but no specific identity given	0.2%	0.2%	0.2%
Trans woman	0.1%	0.1%	0.1%
Trans man	0.1%	0.1%	0.1%
All other gender identities	0.1%	0.2%	0.1%
Not answered	5.4%	6.1%	6%

Source: ONS Census, 2021

### Marriage and Civil Partnership

3.15 **Table 3.4** shows that across all 3 geographies, the majority of residents over the age of 16 have been married, with a higher proportion in Cherwell and Oxfordshire (48% and 46% respectively) than nationally (44%). Less people in Cherwell have never been married (34.5%) than nationally (38%). Oxfordshire has less people who are separated (2%) or divorced (8%) than Cherwell and the national benchmark.

**Table 3.4 Legal Partnership Status (%) by Geographical Area, 2021**

	Cherwell	Oxfordshire	England
Never Married	34.5%	37.7%	37.9%
Married: Opposite Sex	48.1%	46.3%	44.2%
Married: Same Sex	0.3%	0.3%	0.3%
Civil Partnership: Opposite Sex	0.1%	0.1%	0.1%
Civil Partnership: Same Sex	0.1%	0.1%	0.1%
Separated	2.1%	1.9%	2.2%
Divorced	9.3%	8.3%	9.1%
Widowed	5.5%	5.4%	6.1%

Source: ONS Census, 2021

### Pregnancy and Maternity

3.16 **Table 3.5** provides a breakdown of the different household compositions and the proportions of different household types with dependent children. Cherwell had a higher proportion of single-family households (67%) compared to Oxfordshire (65%) and England (63%). Single family households in both Cherwell and Oxfordshire were more likely to have dependent children (17%) than nationally (14%). There were also less lone parent families in Oxfordshire (5%) compared to nationally (7%).

**Table 3.5 Household Composition and Lone Parent Households (%) by Geographical Area, 2021**

	Cherwell	Oxfordshire	England
Single family household	67%	65.4%	63%
Single family household: Married or civil partnership couple: Dependent children	16.9%	16.9%	14.4%

<b>Single family household: Cohabiting couple family: With dependent children</b>	4.8%	4.2%	4.5%
<b>Single family household: Lone parent family: With dependent children</b>	5.7%	5.4%	6.9%
<b>Other household types</b>	6.7%	7.4%	6.9%
<b>Other household types: With dependent children</b>	2.5%	2.2%	2.7%

Source: ONS Census, 2021

## Race

3.17 **Table 3.6** shows the percentage breakdown of ethnic group by geographical area. Overall, Cherwell has the highest proportion of white residents (88.1%) compared to Oxfordshire (86.9%) and England (81%). Cherwell also has a larger amount of people who are 'Other White' (9.1%). Cherwell also has less people who are Asian/ Asian British (6%) or Black/ African/ Caribbean/ Black British (1.8%) than nationally.

**Table 3.6. Ethnic Groups (%) by Different Geographical Areas, 2021**

		Cherwell	Oxfordshire	England
<b>Asian/Asian British</b>	Bangladeshi	0.2%	0.4%	1.1%
	Chinese	0.9%	1.1%	0.8%
	Indian	1.7%	1.7%	3.3%
	Pakistani	2%	1.5%	2.8%
	Other Asian	1.3%	1.6%	1.7%
<b>Black/ African/ Caribbean/ Black British</b>	African	1.1%	1.3%	2.6%
	Caribbean	0.4%	0.5%	1.1%
	Other Black	0.3%	0.3%	0.5%
<b>Mixed/ Multiple Ethnic Groups</b>	White and Asian	0.9%	1.1%	0.8%
	White and Black African	0.5%	0.4%	0.4%
	White and Black Caribbean	0.8%	0.7%	0.9%
	Other Mixed	0.8%	0.9%	0.8%
<b>White</b>	British	77.9%	76.8%	73.5%
	Irish	0.8%	1.0%	0.9%
	Gypsy or Irish Traveller	0.1%	0.1%	0.1%
	Roma	0.2%	0.2%	0.2%
	Other White	9.1%	8.8%	6.3%
<b>Other Ethnic Group</b>	Arab	0.2%	0.3%	0.6%
	Other	1%	1.2%	1.6%

Source: ONS Census, 2021

## Religion and Belief

3.18 **Table 3.7** shows the breakdown of religious groups by geographical area. The dominant belief across all 3 geographies was Christianity, with a higher proportion of Christians across Cherwell (50%) when compared to all benchmarked geographies (47% in Oxfordshire and 46% nationally). On the other hand, Cherwell and Oxfordshire had a lower proportion of residents from Hindu, Jewish, Muslim and Sikh faiths when compared to England.

**Table 3.7. Religion or Belief (%) by Different Geographical Area**

	Cherwell	Oxfordshire	England
<b>No religion</b>	38.1%	40%	36.7%
<b>Christian</b>	50.3%	47.3%	46.3%
<b>Buddhist</b>	0.6%	0.5%	0.5%
<b>Hindu</b>	0.8%	0.9%	1.8%
<b>Jewish</b>	0.1%	0.3%	0.5%
<b>Muslim</b>	3.2%	3.2%	6.7%
<b>Sikh</b>	0.4%	0.2%	0.9%
<b>Other religion</b>	0.5%	0.6%	0.6%
<b>Religion not Stated</b>	6.1%	6.9%	6%

Source: ONS Census, 2021

## Sex

3.19 **Table 3.8** highlights that across all three geographies there are slightly more Females than Males. Cherwell and Oxfordshire have a slightly lower proportion of females compared to England.

**Table 3.8. Proportion (%) of residents by Sex and Geographical Area, 2021**

	Cherwell	Oxfordshire	England
<b>Female</b>	50.4%	50.6%	51%
<b>Male</b>	49.6%	49.4%	49%

Source: ONS Census, 2021

## Sexual Orientation

3.20 **Table 3.9** shows the proportion of adults by their identified sexual orientation for all geographies, highlighting that a higher proportion of residents identified as straight or heterosexual (90.3%) in Cherwell than across Oxfordshire or England. Less people in Cherwell identified as gay or lesbian (1.3%) or bisexual (1.1%) than the other benchmarked geographies.

**Table 3.9. Sexual Orientation (%) by Geographical Area, 2021**

	Cherwell	Oxfordshire	England
<b>Straight or Heterosexual</b>	90.3%	88.4%	89.4%
<b>Gay or Lesbian</b>	1.3%	1.5%	1.5%
<b>Bisexual</b>	1.1%	1.7%	1.3%
<b>All other sexual orientations</b>	0.4%	0.4%	0.3%
<b>Not answered</b>	6.8%	7.9%	7.5%

Source: ONS Census, 2021

## Summary

3.21 **Table 3.10** provides a summary of the prevalence of protected characteristic groups amongst the population. Overall, Cherwell's population profile is broadly in line with regional and national averages, with slightly fewer residents over 65, fewer disabled people, and a higher proportion identifying as White. The district also has a slightly

higher rate of single-family households with dependent children and a greater proportion of residents identifying as heterosexual.

**Table 3.10 Summary**

Protected Characteristic	
<b>Age</b>	<ul style="list-style-type: none"> <li>17% of Cherwell's population is over 65. This is slightly below the regional and national proportion of 18%.</li> <li>64% of Cherwell's population are of working age, in line with the regional and national average.</li> </ul>
<b>Disability</b>	<ul style="list-style-type: none"> <li>14.5% of people in Cherwell are classed as disabled under the Equality Act, in line with Oxfordshire but lower than the national average of 17.3%.</li> <li>5.4% of Cherwell residents have a disability that limits their day-to-day activities a lot, slightly higher than Oxfordshire (5.1%) but lower than England (7.3%).</li> <li>Cherwell has a higher proportion of people (7.6%) who are not classed as disabled under the Equality Act but report having a long-term physical or mental health condition that does not limit their activities, compared to 6.8% nationally.</li> </ul>
<b>Gender Reassignment</b>	<ul style="list-style-type: none"> <li>Most people in Cherwell (94%) still align with the sex they were assigned at birth, broadly in line with the regional and national average.</li> </ul>
<b>Marriage and Civil Partnerships</b>	<ul style="list-style-type: none"> <li>Just under half of residents in Cherwell over the age of 16 have been married (48%).</li> <li>The proportion of same sex marriages and civil partnerships in Cherwell was in line with the regional and national average.</li> </ul>
<b>Pregnancy and Maternity</b>	<ul style="list-style-type: none"> <li>Cherwell had a higher proportion of single-family households (67%) compared to Oxfordshire (65%) and England (63%).</li> <li>Single family households in both Cherwell and Oxfordshire were more likely to have dependent children (17%) than nationally (14%).</li> <li>There were slightly less lone parent families in Cherwell than nationally.</li> </ul>
<b>Race</b>	<ul style="list-style-type: none"> <li>Majority of people in Cherwell are white (88.1%).</li> <li>Cherwell has a larger population of people who are 'other white' than regionally and nationally.</li> <li>Cherwell also has less people who are Asian/ Asian British (6%) or Black/ African/ Caribbean/ Black British (1.8%) than nationally.</li> </ul>
<b>Religion</b>	<ul style="list-style-type: none"> <li>Half of Cherwell's population are Christian, which is more than the regional and national proportions.</li> <li>Cherwell and Oxfordshire had a lower proportion of residents from Hindu, Jewish, Muslim and Sikh faiths when compared to England</li> </ul>
<b>Sex</b>	<ul style="list-style-type: none"> <li>The ratio of men to women in Cherwell is relatively even and broadly in line with Oxfordshire and England.</li> </ul>
<b>Sexual Orientation</b>	<ul style="list-style-type: none"> <li>A higher proportion of residents identified as straight or heterosexual (90.3%) in Cherwell than across Oxfordshire or England.</li> <li>Less people in Cherwell identified as gay or lesbian (1.3%) or bisexual (1.1%) than the regional and national average.</li> </ul>

## 4 Assessment

### Construction Phase

4.1 The Table below identifies the protected characteristics of relevance to the Proposed Development together with the rationale and the assessed impact of the construction phase.

Relevant Protected Characteristics	Rationale	Impacts of Proposed Development
Age	<p><b>Older Persons:</b> Local residents who spend more time at home would be subjected to longer periods of adverse noise impacts. These residents are likely to include older people who may be retired and/or less mobile. Older people may be more sensitive to the health effects arising from poor air quality and dust. Census 2021 data shows that Cherwell has a marginally lower above 65's population (17%) than Oxfordshire (18%) and nationally (18%).</p> <p><b>Children:</b> Children's lungs and immune systems are still developing, they breathe more rapidly and tend to spend more time outdoors. They also tend to be closer to the ground, where pollutants are more concentrated. These factors increase their risk of respiratory problems and long-term health effects. Children may be more sensitive to the health impacts of construction-related dust and exhaust emissions. Census 2021 data shows that Cherwell has a marginally higher below 16s population (19%) than</p>	<p>ES Chapter 4 (Air Quality and Odour) identifies residential and population receptors within 250m of the Application Site, including high sensitivity receptors such as homes. Medium sensitivity receptors include parks, workplaces, and the Ardley Cutting and Quarry SSSI, while low sensitivity receptors include roads, footpaths, and local wildlife sites.</p> <p>A Construction Environmental Management Plan (CEMP) (ES Appendix 2.3) has been developed to minimise impacts associated with dust and noise, incorporating measures such as dust suppression, emissions controls, and the application of Best Practicable Means (with further P-CEMPs to be prepared for the different phases of construction). Based on the Air Quality assessment in ES Chapter 4 (Air Quality and Odour), and with these mitigation measures in place, construction-phase air quality impacts are <b>anticipated to be neutral for these groups</b>.</p> <p>Older residents located near the Main Site, bypass, and rail corridor may be more vulnerable to construction-related noise and vibration, especially during night-time hours. The CEMP (ES Appendix 2.3) includes a range of measures</p>

Relevant Protected Characteristics	Rationale	Impacts of Proposed Development
	<p>Oxfordshire (18%), which is the same as the national benchmark (19%).</p> <p><b>Young people:</b> During construction it is expected that temporary construction jobs, training and apprenticeship opportunities will be supported. While these opportunities will be available to all age ranges, apprenticeships tend to be accessed by school-leavers and young adults (16-24 year olds). Cherwell (Census 2021) has 8.9% of 16-24years proportion of population which is less than 11.7% proportion of Oxfordshire.</p>	<p>to minimise these effects, including the use of low-noise equipment, bunding and acoustic barriers, controlled working hours, and site management protocols in line with Best Practicable Means. While some temporary effects may occur during certain activities such as earthworks, the overall prediction is that construction noise and vibration impacts (ES Chapter 5 (Noise and Vibration)) will not be significant are therefore <b>considered neutral</b>.</p> <p>ES Chapter 12 (Socio-economics) determines that the construction activity associated with the Proposed Development is expected to support an average of around 925 jobs per year throughout the duration of the construction programme. There are also opportunities to deliver apprenticeship and training programmes during the construction phase, in collaboration with local colleges and training providers, which will be of particular relevance for young people and young adults. To support these outcomes, an Employment Scheme as required by the DCO will be prepare for the construction stage. Based on this, it is anticipated there will be <b>positive impacts for this group</b>.</p>
<b>Disability</b>	<p><b>Equality Act Disability and Long-term Illness:</b> Local residents who spend more time at home or with heightened sensitivity to noise, would be subjected to longer periods of adverse noise impacts. These residents are likely to include people with disabilities and long-term limiting illnesses.</p>	<p>The ES Chapter 5 (Noise and Vibration) assessment showed no significant construction noise or vibration effects are currently predicted, although temporary adverse impacts may still occur, particularly during earthworks or night-time highway works. Best Practicable Means are implemented through a CEMP (ES Appendix 2.3) to minimise these effects. Due to the</p>

Relevant Protected Characteristics	Rationale	Impacts of Proposed Development
	<p>Further to this, those with cognitive impairments or autism may have a differential sensitivity to noise and therefore be more sensitive to construction noise. For people with mobility and sensory issues, changes to the pedestrian environment and noise during construction may disproportionately affect them.</p> <p>Regarding the population with a disability, the census 2021 data showed that Cherwell has the same proportion as Oxfordshire regarding those identified under the equality act (14.5%) below the national average (17.4%). It should be highlighted that while still below national average, Cherwell has a higher proportion of people in this category that state their daily activities are limited a lot (5.4%) compared to Oxfordshire.</p>	<p>mitigations in place the <b>construction impact is considered neutral.</b></p>
<b>Gender Reassignment</b>	<p>There is no evidence to indicate the construction phase of the Proposed Development will have relevance to the protected characteristics of gender reassignment.</p>	n/a
<b>Marriage and Civil Partnership</b>	<p>There is no evidence to indicate the construction phase of the Proposed Development will have relevance to the protected characteristics of marriage and civil partnership.</p>	n/a
<b>Pregnancy and Maternity</b>	<p>Those pregnant or caring for young children may experience greater challenges with walking or using public transport and may spend more time at home and therefore be subjected to longer periods of adverse noise impacts.</p> <p>Cherwell had a higher proportion of households with dependents (35.9%) compared to Oxfordshire (33.4%) but less than national level of 38.7%.</p>	<p>ES Chapter 5 (Noise and Vibration) Assessment determined that significant noise and vibration impacts due to construction works can be avoided with the typical measures adopted during construction and implemented through the CEMP (ES Appendix 2.3). Impacts are therefore <b>considered to be neutral.</b></p>

Relevant Protected Characteristics	Rationale	Impacts of Proposed Development
<b>Race</b>	There is no evidence to indicate the construction phase of the Proposed Development will have relevance to the protected characteristics of Race.	n/a
<b>Religion</b>	There is no evidence to indicate the construction phase of the Proposed Development will have relevance to the protected characteristics of Religion.	n/a
<b>Sex</b>	Women are statistically more likely to have caring responsibilities outside of work, so a relocation/increased travel times may have an impact on their ability to undertake these responsibilities	ES Chapter 3 (Transport) sets out that with the CEMP (ES Appendix 2.3) in place, as well as other construction traffic management measures (see Transport Assessment – ES Appendix 3.1), the assessment has not identified any significant adverse effects during the construction phase of the Proposed Development.
<b>Sexual Orientation</b>	There is no evidence to indicate the construction phase of the Proposed Development will have relevance to the protected characteristics of sexual orientation.	n/a

## Operational Phase

4.2 The Table below identifies the protected characteristics of relevance to the Proposed Development together with the rationale and the assessed impact of the Proposed Development's operational phase.

Relevant Protected Characteristics	Rationale	Impacts of Proposed Development
Age	<p><b>Older People:</b> Those spending more time at home, such as older residents, are typically more exposed to prolonged noise impacts. They may also be more vulnerable to health issues linked to poor air quality and dust. Older people may also be more sensitive to impacts of accessibility, active travel and changes to public transport. According to Census 2021, 17% of Cherwell's population is aged 65+, slightly below the Oxfordshire and national averages (both 18%). With the projected rise in retirement age the labour market may see increasing numbers of older people re-entering or remaining within the workforce.</p> <p><b>Children:</b> Children are more susceptible to air pollution due to developing lungs, higher breathing rates, and time spent closer to ground-level pollutants. Children may also be more sensitive to impacts of accessibility, active travel and changes to public transport. Census 2021 data shows that 19% of Cherwell's population is under 16 – slightly higher than Oxfordshire (18%) and matching the national average.</p> <p><b>Young People:</b> In Cherwell, 16–24-year-olds make up 8.9% of the population, below the Oxfordshire average of 11.7%.</p>	<p>ES Chapter 4 (Air Quality and Odour) assessment states that the Proposed Development is considered to cause minor adverse (at worst) effect in relation to operational road traffic. Residual noise effects from operational traffic and rail are also considered to be not significant. <b>Operational impacts on people of protected age groups in relation to air and noise quality is considered neutral.</b></p> <p>The Proposed Development is expected to generate significant employment opportunities, with around 60% of new jobs likely to be taken up by Cherwell residents and up to 90% by those within the wider sub-region. This includes unemployed individuals, job-switchers (including out-commuters), new residents from planned housing growth, and older workers remaining in or re-entering the workforce due to rising pension ages.</p> <p>The creation of jobs across various skill levels at operational stage of the Proposed Development, is likely to benefit people of all ages, including younger people (via entry level roles, apprenticeships and training opportunities) and older people (through extended working lives). Access to employment is a key factor in improving health and wellbeing, reducing poverty, and enhancing self-esteem. It is expected that the <b>operational impacts to people of protected age groups will be positive.</b></p>

Relevant Protected Characteristics	Rationale	Impacts of Proposed Development
	<p>Opportunities for entry level careers, training and apprenticeships are particularly relevant for this segment of the population.</p>	<p>The design of the Proposed Development has been influenced by the aim of providing the necessary new or upgraded infrastructure to promote journeys to and within the Main Site by foot and cycle which will promote active travel. There will also be footpath and cycle routes along the new roads with at grade crossings to provide continued and improved access and connectivity. Additional infrastructure is proposed to form a continuous pedestrian and cycle route from the site to Bicester and other nearby settlements including Heyford Park, all of which will help to promote opportunities for physical activity through active travel. It is expected that the <b>operational impacts to people of protected age groups will be positive.</b></p>
<p><b>Disability</b></p>	<p>Individuals with disabilities can be susceptible to decreased physical activity due to accessibility and may also be more limited in their ability to access public realm, landscape and other facilities which might otherwise provide health benefits. Well-designed, accessible buildings and spaces encourage use by all groups.</p> <p>Cherwell has the same proportion as Oxfordshire regarding those identified as disabled under the equality act (14.5%) and below the national average (17.4%). It should be highlighted that while still below national average, Cherwell has a higher proportion of people in this category that state their daily activities are limited a lot (5.4%) compared to Oxfordshire.</p>	<p>When compared to the existing highway network configuration, the proposed highway works at M40 Junction 10 and Baynard’s Green will deliver substantial operational improvements, with significant reductions in average vehicle delay and allowing additional traffic to use the junction complex than would otherwise be able to do so. When compared to the potential future baseline highway network (with potential third-party improvement works at Baynard’s Green) the proposed OxSRFI highway works will deliver operational improvements to the M40 northbound corridor. The provision of a new northbound off-slip connecting directly to Padbury junction and the comprehensive upgrade to Ardley Roundabout is forecast to significantly reduce M40 off-slip queuing at Ardley Roundabout. This addresses the road safety risk of slip road queuing interacting with the M40 mainline in the future year baseline scenario. The overall highway network-wide performance at M40 Junction 10 and Baynard’s Green will remain comparable to the significantly improved future baseline highway network position,</p>

Relevant Protected Characteristics	Rationale	Impacts of Proposed Development
		<p>confirming adequate capacity provision for future year conditions at M40 Junction 10 and Baynard's Green.</p> <p>These changes are likely to support more reliable and less stressful travel, which may particularly benefit those who can face challenges using public transport or walking longer distances. <b>This may result in positive impacts.</b></p> <p>The Main Site Design Approach Document (DAD) (Document 5.5A) sets out a design code which incorporates the following relevant principles that will inform the design and layout of the detail stage of the Proposed Development:</p> <ul style="list-style-type: none"> <li>• the layout and orientation of each building should contribute to a sense of place and identity, including safe access and wayfinding throughout the Main Site;</li> <li>• to develop a safe and accessible place to work and move around in;</li> <li>• tactile paving and dropped kerbs will be provided at all changes in levels and at road crossings;</li> <li>• inside individual plots, paths will lead from external walking and cycling routes and from the cycle parking and car park to each office main entrance. Routes will be wheelchair friendly, and use durable, well-chosen materials to enhance identity and provide smooth transitions between areas;</li> <li>• each plot will have access to shared outdoor spaces designed for staff use and positioned near office entrances for ease of accessibility for all. Areas will include clusters of seating and benches to provide a</li> </ul>

Relevant Protected Characteristics	Rationale	Impacts of Proposed Development
		<p>range of outdoor seating opportunities for groups and individuals.</p> <p>The Illustrative Masterplan (Document 2.6) for the Main Site is illustrative only at this stage and therefore the quantum of any parking is not yet defined. The Framework Travel Plan (ES Appendix 3.2) confirms accessible parking will be provided at each warehouse unit on the development site.</p>
<p><b>Gender Reassignment</b></p>	<p>Transgender people are more likely to experience threats of physical or sexual harassment or violence compared with the LGBTQ+ community as a whole. This is particularly relevant in the context of rising transphobic hate crimes, which now account for 3% of all recorded hate crimes in the UK—three times higher than in 2012, when such data collection began. The report also highlights that trans and non-binary individuals are significantly less likely to feel safe in schools and workplaces, pointing to broader structural and societal challenges affecting their daily lives.<sup>2</sup> The promotion of natural surveillance and social interaction through design can help to reduce crime and the ‘fear of crime’, both of which impacts on the mental wellbeing of residents.</p>	<p>The Design Approach Document (DAD) sets out a design code which incorporates the following relevant principles that will inform the design and layout of the detail stage of the Proposed Development:</p> <ul style="list-style-type: none"> <li>• the layout and orientation of each building should contribute to a sense of place and identity, including safe access and wayfinding throughout the site;</li> <li>• to provide safe and convenient pedestrian and cycle access to each unit;</li> <li>• to develop a safe and accessible place to work and move around in;</li> <li>• a suitable lighting strategy for the purposes of safety.</li> </ul> <p>Natural surveillance will be a key factor in the overall design of the Main Site. Offices will overlook car and cycle parking and pedestrian access routes.</p> <p>Based on this approach to design it is anticipated impacts <b>will be neutral/positive.</b></p>

<sup>2</sup> <https://diva-magazine.com/2024/11/19/72-of-the-trans-community-do-not-feel-safe-living-in-the-uk/>

Relevant Protected Characteristics	Rationale	Impacts of Proposed Development
<b>Marriage and Civil Partnership</b>	There is no evidence to indicate the operational phase of the Proposed Development will have relevance to the protected characteristics of marriage and civil partnerships.	n/a
<b>Pregnancy and Maternity</b>	<p>Those pregnant or caring for young children may experience greater challenges with walking or using public transport.</p> <p>Local residents who spend more time at home would be subjected to longer periods of adverse noise impacts. These residents are likely to include those caring for young infants.</p> <p>Cherwell had a higher proportion of households with dependents (35.9%) compared to Oxfordshire (33.4%) but less than national level of 38.7 %</p>	<p>When compared to the existing highway network configuration, the proposed highway works at M40 Junction 10 and Baynard's Green will deliver substantial operational improvements, with significant reductions in average vehicle delay and allowing additional traffic to use the junction complex than would otherwise be able to do so. When compared to the potential future baseline highway network (with potential third-party improvement works at Baynard's Green) the proposed OxSRFI highway works will deliver operational improvements to the M40 northbound corridor.</p> <p>The provision of a new northbound off-slip connecting directly to Padbury junction and the comprehensive upgrade to Ardley Roundabout is forecast to significantly reduce M40 off-slip queuing at Ardley Roundabout. This addresses the road safety risk of slip road queuing interacting with the M40 mainline in the future year baseline scenario. The overall highway network-wide performance at M40 Junction 10 and Baynard's Green will remain comparable to the significantly improved future baseline highway network position, confirming adequate capacity provision for future year conditions at M40 Junction 10 and Baynard's Green.</p> <p>These changes are likely to support more reliable and less stressful travel, which may particularly benefit those who are pregnant or caring for young children, who can face challenges using public transport or walking longer distances. <b>This may result in positive impacts.</b></p>

Relevant Protected Characteristics	Rationale	Impacts of Proposed Development
<b>Race</b>	There is no evidence to indicate the operational phase of the Proposed Development will have relevance to the protected characteristics of Race.	n/a
<b>Religion</b>	There is no evidence to indicate the operational phase of the Proposed Development will have relevance to the protected characteristics of Religion.	n/a
<b>Sex</b>	Women are statistically more likely to have caring responsibilities outside of work, so a relocation/increased travel times may have an impact on their ability to undertake these responsibilities.	<p>All B430 through-traffic will be removed from Ardley village, onto the Ardley Bypass, and with the Heyford Park Link Road, Middleton Stoney Relief Road, and the improvement scheme at M40 Junction 9 in place, future year traffic flows through Middleton Stoney village will be reduced. The operation of the B430/B4030 crossroads within Middleton Stoney will be improved and congestion reduced.</p> <p>These improvements, subject to final modelling, are anticipated to provide a permanent, highly beneficial impact on the highway network. Additionally, the proposed Ardley Bypass will remove through traffic from the village, easing local congestion and further supporting more reliable travel. In relation to this, <b>it is proposed this development will have positive impacts.</b></p>
<b>Sexual Orientation</b>	There is no evidence to indicate the operational phase of the Proposed Development will have relevance to the protected characteristics of Sexual Orientation	n/a

## 5 Conclusions and Recommendations

- 5.1 A summary of the impacts of the key features of the Proposed Development is set out below together with any recommendations in terms of enhancement or mitigation to be considered in future detailed design stages.

Proposed Development Feature	Relevant Groups	Overall Equality Impact and Recommendations
<p><b>Construction Phase</b></p>	<ul style="list-style-type: none"> <li>• Age (Older people, children and young adults)</li> <li>• Disability</li> <li>• Pregnancy and maternity</li> <li>• Sex (women)</li> </ul>	<p>Neutral/Positive</p> <p><b>Recommendation:</b> Ensure mitigations and recommendations set out in the P-CEMP are implemented during construction.</p> <p>Promote inclusive recruitment and training pathways in collaboration with local colleges and providers via an Employment Scheme to be prepared as per the requirements of the DCO.</p> <p>A DCO requirement for a Community Liaison Group which will help to ensure ongoing engagement with local communities, particularly underrepresented groups, to inform final construction planning.</p>
<p><b>Strategic Rail Freight Interchange (SRFI) with intermodal terminal and container storage</b></p>	<ul style="list-style-type: none"> <li>• Age (Older people, children and young adults)</li> <li>• Disability</li> <li>• Pregnancy and maternity</li> </ul>	<p>Neutral</p> <p><b>Recommendation:</b> Ensure compliance with air quality and odour mitigation (e.g. Odour Management Plan – see ES Appendix 4.6), incorporate inclusive design in the OxSRFI layout, and engage with affected groups during future detailed design stages. This will be controlled through the detailed design as part of the relevant DCO requirements.</p>

Proposed Development Feature	Relevant Groups	Overall Equality Impact and Recommendations
<p><b>603,850 sqm of warehousing and ancillary office space, plus mezzanine floorspace</b></p>	<ul style="list-style-type: none"> <li>• Age (Young adults and older workers)</li> <li>• Disability (People with physical or long-term health conditions)</li> <li>• Gender reassignment (Trans and non-binary people)</li> </ul>	<p>Positive</p> <p><b>Recommendation:</b> Via Employment Schemes to be prepared as per a DCO requirement, embed inclusive employment practices and promote training and apprenticeship schemes targeted at young people, disabled individuals, and older workers. Monitor access and diversity in recruitment.</p> <p>Ensure employee facilities within each warehouse are fully accessible and designed to promote natural surveillance and community inclusion, as well as equal, dignified and independent access for all users. This will be controlled through the detailed design as part of the relevant DCO requirements</p>
<p><b>Central Hub incorporating Ashgrove Farm and repurposed Threshing Barn (Grade II Listed Building)</b></p>	<ul style="list-style-type: none"> <li>• Disability (Older people, people with mobility impairments)</li> <li>• Gender reassignment (Trans and non-binary people)</li> </ul>	<p>Neutral</p> <p><b>Recommendation:</b> Ensure the Central Hub and other employee facilities within each warehouse are fully accessible and designed to promote natural surveillance and community inclusion, as well as equal, dignified and independent access for all users. This will be controlled through the detailed design as part of the relevant DCO requirements.</p>

Proposed Development Feature	Relevant Groups	Overall Equality Impact and Recommendations
<p><b>Highway improvements (M40 J10 upgrade, Ardley Bypass, Heyford Park Link Road, Middleton Stoney Relief Road)</b></p>	<ul style="list-style-type: none"> <li>• Age (Older people)</li> <li>• Disability (People with mobility impairments)</li> <li>• Sex (Women)</li> <li>• Pregnancy and maternity (Pregnant people and carers)</li> </ul>	<p>Positive</p> <p>Journey time reductions and congestion relief are expected to benefit those who rely on efficient, reliable travel, especially women and carers. Safety benefits may also accrue.</p> <p><b>Recommendation:</b> Through ongoing community consultation (through the Community Liaison Group, delivered through a DCO requirement), monitor transport outcomes for different user groups, including impacts on local service access.</p>
<p><b>Primary and secondary access points, including prioritisation for buses, cycles, pedestrians, and emergency vehicles</b></p>	<ul style="list-style-type: none"> <li>• Age (Children and older people)</li> <li>• Disability (People with mobility and sensory impairments)</li> <li>• Sex (Women)</li> <li>• Pregnancy and maternity (Pregnant people and carers)</li> <li>• Low-income groups (reliant on public transport)</li> </ul>	<p>Neutral/Positive</p> <p><b>Recommendation:</b> Confirm that bus, walking, and cycling access is inclusive and convenient. Consider design audits, controlled through the Travel Plan (ES Appendix 3.2) and DAD (ES Appendix 2.3), to ensure routes serve disabled users and carers effectively</p>

Proposed Development Feature	Relevant Groups	Overall Equality Impact and Recommendations
<p><b>132 hectares of green infrastructure, including retained woodland, planting, conservation grassland, and strategic mounding</b></p>	<ul style="list-style-type: none"> <li>• Age (Older people/Younger People)</li> <li>• Disability (People with sensory or physical impairments)</li> <li>• Gender reassignment (Trans and non-binary people)</li> <li>• Sexual orientation (LGBTQ+ people)</li> </ul>	<p>Neutral/Positive</p> <p><b>Recommendation:</b> Incorporate co-design or feedback from underrepresented groups where possible (through the Community Liaison Group, delivered through a DCO requirement).</p>
<p><b>Network of new public access routes linking to existing PRoWs and nearby communities</b></p>	<ul style="list-style-type: none"> <li>• Age (Children and older people)</li> <li>• Disability (People with mobility and sensory impairments)</li> <li>• Sex (Women)</li> <li>• Pregnancy and maternity (Pregnant people and carers)</li> </ul>	<p>Neutral/Positive</p> <p><b>Recommendation:</b> Ensure pathways are DDA-compliant, well-lit, and clearly signposted. Include quiet or sensory-friendly sections and benches to support use by older people, pregnant individuals, and those with cognitive or mobility impairments. This will be controlled through the detailed design as part of the relevant DCO requirements.</p>

