



DCO Submission

Environmental Statement

Chapter 2: Description of Development and Alternatives
Appendix 2.4: Alternative Sites Assessment

Document 6.2D
Rev A

On behalf of
Oxfordshire Railfreight Limited

Prepared by Oxalis Planning
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1.0 INTRODUCTION

1.1 This Alternative Sites Assessment (ASA) sets out the Applicant's consideration of reasonable alternative sites for the proposed Oxfordshire Strategic Rail Freight Interchange (OxSRFI) development.

1.2 There is no legislative requirement for the Applicant to consider alternative sites. Regulation 18(3)(d) of the EIA Regulations (2017) states that an Environmental Statement is a statement which includes, among other elements:

“(d) a description of the reasonable alternatives studied by the developer, which are relevant to the proposed development and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the development on the environment”.

1.3 However, Planning Practice Guidance (PPG) clarifies that the EIA Regulations “do not require an applicant to consider alternatives”, but that where alternatives have been considered, applicants are required to include in their ES a description of the reasonable alternatives studied and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects¹.

1.4 Nonetheless, this assessment has been produced in response to various comments raised during the Scoping process and Stage 1 non-statutory consultation, and to help demonstrate that the Main Site is an appropriate location for a SRFI. It is not the intention of this document to argue that the development could not be located elsewhere, but to demonstrate that the Main Site is the most suitable of the reasonable alternatives studied by the Applicant. The Government is explicitly supportive of a network of SRFIs across the regions to serve regional, sub-regional and cross-regional markets² and within this policy context, it is accepted that an SRFI – or indeed other SRFIs - could be located elsewhere in Oxfordshire.

1.5 In addition, officers at Cherwell District Council were consulted prior to the ASA being finalised and several sites were put forward by the Council for consideration. The ASA has considered these sites under the methodology set out in the assessment with a specific response to each of these sites also covered in **Annex A**.

Methodology

1.6 There is no formally prescribed process or methodology for undertaking an ASA, and the process should be adapted to the characteristics of different projects. The method used in this ASA reflects the planning policy requirements set out in Section 2 of this assessment, and the specific operational and locational needs of an SRFI.

¹ Paragraph 041, reference ID: 4-041-20170728, Planning Practice Guidance

² Paragraph 3.100 of the NPS (Department for Transport, 2024)

1.7 For the OxSRFI project, this ASA broadly follows these key steps:

- **Section 2** – National Planning Policy: a review of the National Networks National Planning Statement, which includes guidance on locational priorities.
- **Section 3** – Contributing to the National Network: a review of the current national network of SRFI facilities alongside a summary of the demonstrable need for further SRFIs (along the M40 corridor in particular).
- **Section 4** – Defining the initial ‘Search Area’: drawing on policy, market need, and the location of existing SRFIs, a geographic “Search Area” is established.
- **Section 5** – Establishing the ‘Focus Areas’: within the initial Search Area, Focus Areas are established using a series of fundamental SRFI criteria including suitable proximity to the strategic road and rail networks and avoiding priority environmental constraints (based on the NPS guidance).
- **Section 6** - Identifying the Long List of Sites: a number of sites within the ‘Focus Areas’ are identified, based on professional judgement, for assessment.
- **Section 7** - The Long List Sifting Process (Establishing the Short List): the Long List of sites is subject to a sifting process based on more site-specific criteria.
- **Section 6** – Short List Assessment Criteria: a more detailed ‘site level’ criteria is established to identify and assess the suitability of the potential short listed alternative sites.
- **Section 7** – Alternative Site Assessment: the Short List sites are assessed against the criteria established in Section 6.
- **Section 8** – Summary and Conclusions.

1.8 This ASA does not seek to justify in detail the suitability of the Proposed Development in its own right. The suitability of the proposed OxSRFI Main Site from a planning and environmental perspective is assessed in detail within the Planning Statement, Environmental Statement and Design Approach Document. Further information on design evolution and alternative layouts of the proposed OxSRFI are also provided within the Design Approach Document and Environmental Statement.

2.0 NATIONAL PLANNING POLICY

Introduction

2.1 A detailed summary and analysis of the planning policy framework is set out in the Planning Statement. The purpose of this section is only to summarise the requirements and recommendations for SRFIs as set out in the National Networks National Planning Statement (NPS). These requirements and recommendations form the basis for the alternative site search methodology and the analysis of an alternative site's potential suitability.

Need for SRFIs

2.2 The NPS highlights the government's commitment to grow the rail freight sector and has set a target *"of at least 75% growth in rail freight by 2050"*. The NPS acknowledges that to achieve this level of growth, *"the right infrastructure needs to be in place, providing the necessary capacity and capability to support growth. SRFIs are crucial to rail freight growth"*³. The NPS also goes on to state: *"to facilitate this modal shift, a network of SRFIs is needed across a broad range of regions, to serve regional, sub-regional and cross-regional markets"*⁴.

2.3 The NPS considers the alternative options to the growth of rail freight which comprises:

- a reliance on existing rail freight interchanges to manage demand,
- a reliance on road based logistics, or
- a reliance on a larger number of smaller rail freight interchanges.

2.4 The NPS sets out that none of these options are *"viable or desirable"*⁵, and therefore concludes that *"there is a compelling need for an expanded network of SRFIs throughout the country"*⁶.

2.5 The need for more SRFIs also reflects the Government's decarbonisation agenda which encourages modal shift of freight from road to rail, reducing greenhouse gas emissions. Other associated benefits include reducing congestion and noise pollution⁷. The NPS explains that other drivers of the need for additional SRFIs from the logistics sector include the need for network performance and resilience, in response to user needs, and economic growth and job creation⁸.

2.6 Given the above context, and overall *"compelling need"* set out by the government for additional SRFIs⁹, this ASA is not seeking to prove that there are no alternative suitable

³ Paragraph 3.99 of the NPS (Department for Transport, 2024)

⁴ Paragraph 3.100 of the NPS (Department for Transport, 2024)

⁵ Paragraph 3.102 and Table 1 of the NPS (Department for Transport, 2024)

⁶ Paragraph 3.103 of the NPS (Department for Transport, 2024)

⁷ Decarbonising Transport: a better, greener Britain, (Department for Transport 2021)

⁸ Paragraphs 3.81 to 3.93 of the NPS (Department for Transport, 2024)

⁹ Paragraph 3.103 of the NPS (Department for Transport, 2024)

sites for a SRFI, but rather to form part of the evidence base to help demonstrate the suitability of the OxSRFI site.

Locational requirements of SRFIs

- 2.7 To constitute an NSIP, an SRFI site must be at least 60ha in size and have capacity to handle four or more trains a day¹⁰. The OxSRFI Main Site would be approximately 300 hectares (including proposed landscaping, but excluding highways works) with the capacity to handle at least 4 goods trains per day and, therefore, meets the requirements to form an NSIP. It is notable that all other recently approved and proposed SRFI are of a similar scale. It is considered by the Applicant that significantly smaller sites are less likely to be able to meet all of the requirements to deliver a viable SRFI.
- 2.8 The NPS states that in all cases, it is essential that SRFIs have good connectivity with both road and rail networks, in particular the strategic rail freight network¹¹. The strategic rail freight network is shown in Figure 1 below.
- 2.9 The Chiltern Main Line forms part of the strategic freight network. The NPS sets out that SRFIs should ideally be located on a route which can accommodate larger freight wagons, ideally on a route with a gauge clearance of W8 or more, or capable of enhancement to a suitable gauge¹². The Chiltern Line meets this criterion (confirmed through 'gauging' assessments undertaken with Network Rail).

¹⁰ Part 3, clause 26 of the Planning Act 2008

¹¹ Paragraph 3.100 of the NPS (Department for Transport, 2024)

¹² Paragraph 4.82 of the NPS (Department for Transport, 2024)

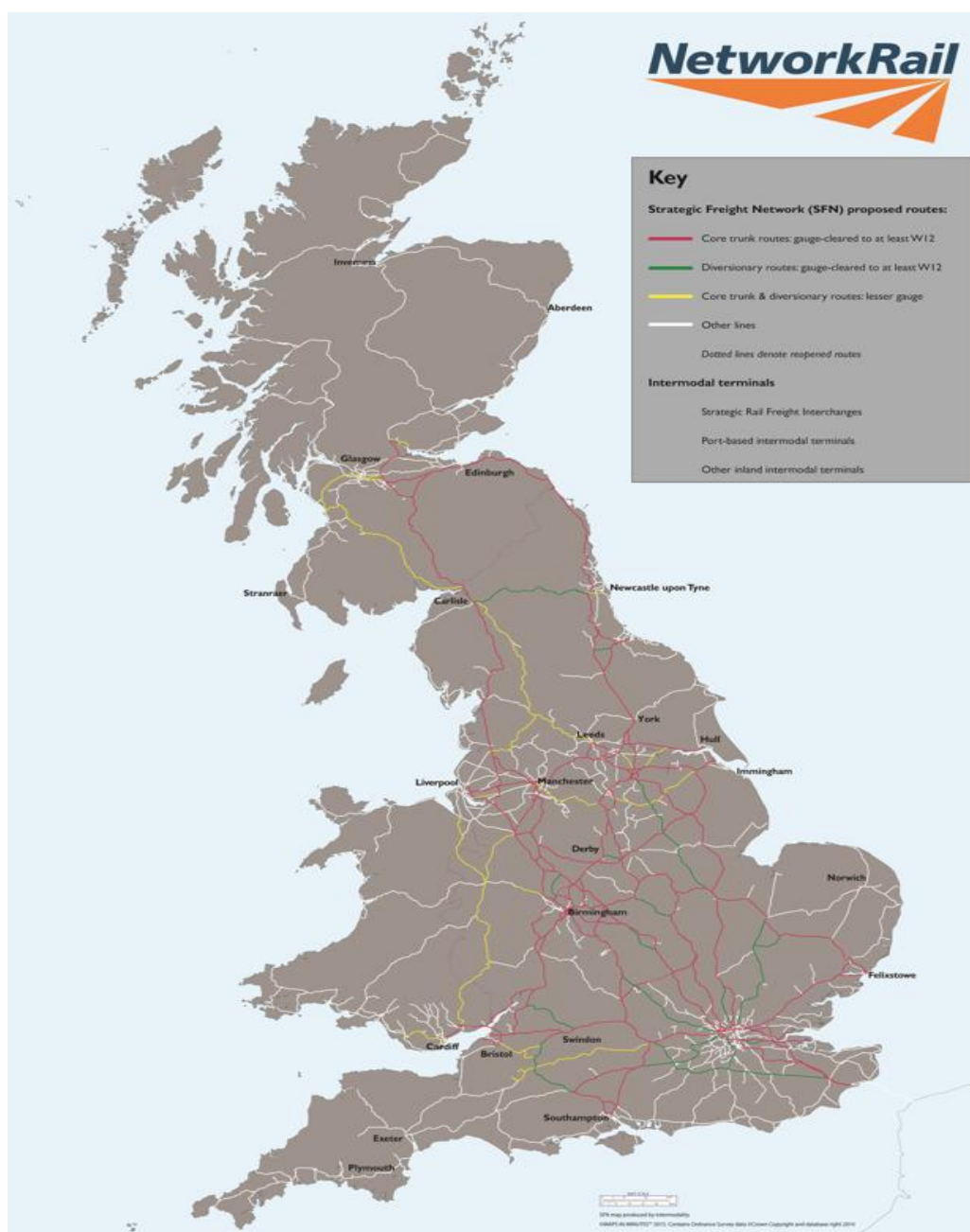
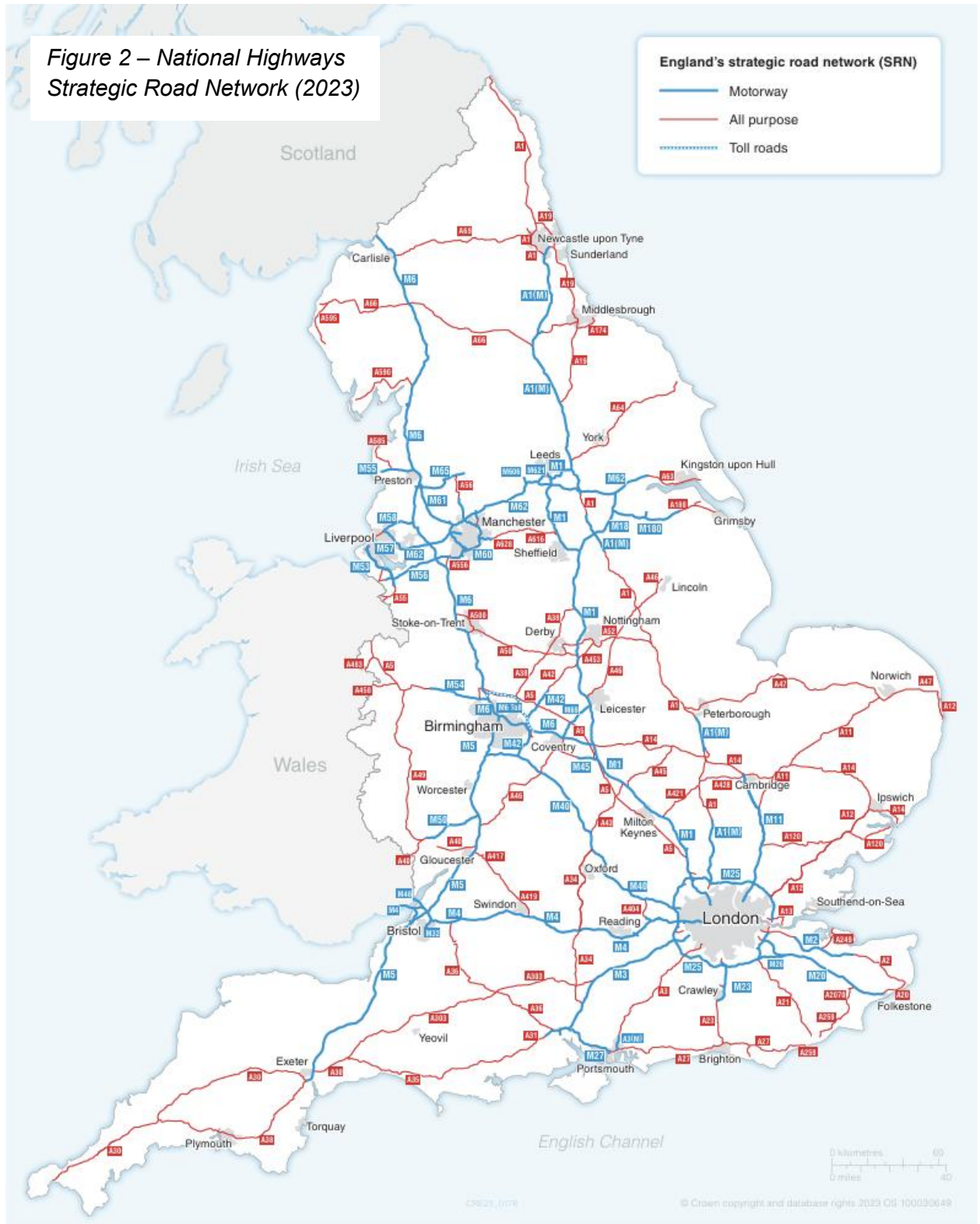


Figure 1 – The Strategic Rail Freight Network

2.10 In terms of road links, SRFIs must have good connectivity to the strategic road network. The NPS definition of the Strategic Road Network (SRN) is that the SRN “covers trunk roads and motorways in England where National Highways or the Secretary of State is the highway authority”¹³. This comprises, at the time of writing, motorways and major trunk roads managed by National Highways. A copy of the National Highways Strategic Road Network is shown below (Figure 2), and shows that both the M40 and A43 form part of the SRN.

¹³ Paragraph 1.5, footnote b of the NPS (Department for Transport, 2024)



2.11 SRFIs involve large structures, buildings, and the operation of heavy machinery, which can require continuous working arrangements. In terms of appropriate locations, the NPS therefore acknowledges that SRFIs often may not be suitable adjacent to residential areas or environmentally sensitive locations such as National Parks or Areas of Outstanding Natural Beauty¹⁴. It goes on to clarify that depending on circumstances, appropriate mitigation measures may be available to limit the impacts of visual intrusion, noise and light¹⁵. It also underlines the benefits and importance of access to local sources of labour. However, the NPS states that there is a presumption against development of new roads and SRFIs in designated areas (National Parks and National Landscapes) unless there are exceptional circumstances where the benefits outweigh the harm¹⁵.

2.12 As a result of the above characteristics and the forecasted growth in rail freight, the NPS confirms that the number of suitable locations for SRFIs will be limited¹⁶ and that:

“Due to their requirements, it may be that countryside locations are required for SRFIs”¹⁷

2.13 The NPS goes on to acknowledge:

“The siting of many existing rail freight interchanges in traditional urban locations can mean that there is difficulty in expanding them as they lack warehousing. These Rail Freight Interchanges have value in addressing urban logistics needs such as urban retail or parcel deliveries, but a wider network will further support the modern logistics and supply chain industry.”¹⁸

2.14 The NPS highlights the importance of SRFIs being located near the markets they serve and states:

“It is important that SRFIs are located near the markets they will serve – major urban centres, or groups of centres – and are linked to key supply chain routes. Given the locational requirements and the need for effective connections for both rail and road, the number of locations suitable for SRFIs will be limited, which will restrict the scope for developers to identify viable alternative sites.”¹⁹

2.15 In terms of SRFIs in London and the South East, the NPS highlights that most intermodal Rail Freight Interchanges and rail-connected warehousing *“is on a small scale and can be poorly located in relation to the main urban areas”²⁰*. This leads the NPS to state that: *“SRFI capacity needs to be provided at a wide range of locations,*

¹⁴ Paragraph 4.83 of the NPS (Department for Transport, 2024)

¹⁵ Paragraphs 5.171 of the NPS (Department for Transport, 2024)

¹⁶ Paragraph 3.103 of the NPS (Department for Transport, 2024)

¹⁷ Paragraph 4.81 of the NPS (Department for Transport, 2024)

¹⁸ Paragraph 3.88 of the NPS (Department for Transport, 2024)

¹⁹ Paragraph 3.103 of the NPS (Department for Transport, 2024)

²⁰ Paragraph 3.104 of the NPS (Department for Transport, 2024)

*both in regions where they are currently located and, more broadly, to provide the flexibility needed to match the changing demands of the market, possibly with traffic moving from existing Rail Freight Interchange to new larger facilities. There is a particular challenge in expanding rail freight interchanges serving London and the South East.*²¹

- 2.16 The following section will build on the requirements and recommendations set out in the NPS and consider the current national network of SRFI facilities.

²¹ Paragraph 3.105 of the NPS (Department for Transport, 2024)

3.0 DEFINING THE SEARCH AREA

- 3.1 The 'Search Area' is the initial geographic area established by the Applicant for identifying potential alternative sites and is therefore the starting point of the assessment. The location and extent of the Search Area was largely informed by the location of existing SRFIs i.e., the current national network. The following sections expand on how the Search Area was established.

Contributing to the National Network of SRFIs

- 3.3 In searching for a location for a new SRFI, it is appropriate to firstly examine the scope and suitability of the existing national network of SRFIs and understand how that current network operates. The Map under Figure 3 illustrates the current network of operational, consented, and planned SRFIs across England and Scotland.
- 3.4 Figure 3 highlights that relatively few areas of England accommodate existing SRFIs as they are located far apart and/or in clusters, and often serve wide areas. There is a notable concentration of SRFIs in the Midlands, principally along the M1-M6 corridor. However, the NPS clearly states that relying on the existing rail freight interchanges to manage demand is neither a viable nor desirable option:

"Relying on the existing infrastructure is not viable and would cause a constraint on economic activity. The current network of Rail Freight Interchanges and SRFIs are not sufficiently located to realise the full benefits of rail freight across the country. Additionally, further growth is expected, especially in the intermodal market, and the current infrastructure will not be able to accommodate the growth in demand."²²

- 3.5 The existing concentrated network has grown in recent years; notable examples include the scheme at East Midlands Gateway (EMG) and the expansion of Daventry International Rail Freight Terminal (DIRFT). This concentrated network is being expanded further with the schemes at Northampton Gateway and Wolverhampton (West Midlands Interchange (WMI)) under construction. Figure 3 below shows the number of 'active' SRFIs (which includes those approved but not yet fully built-out and still under construction).

²² Table 1, Page 37 of the NPS (Department for Transport, 2024)

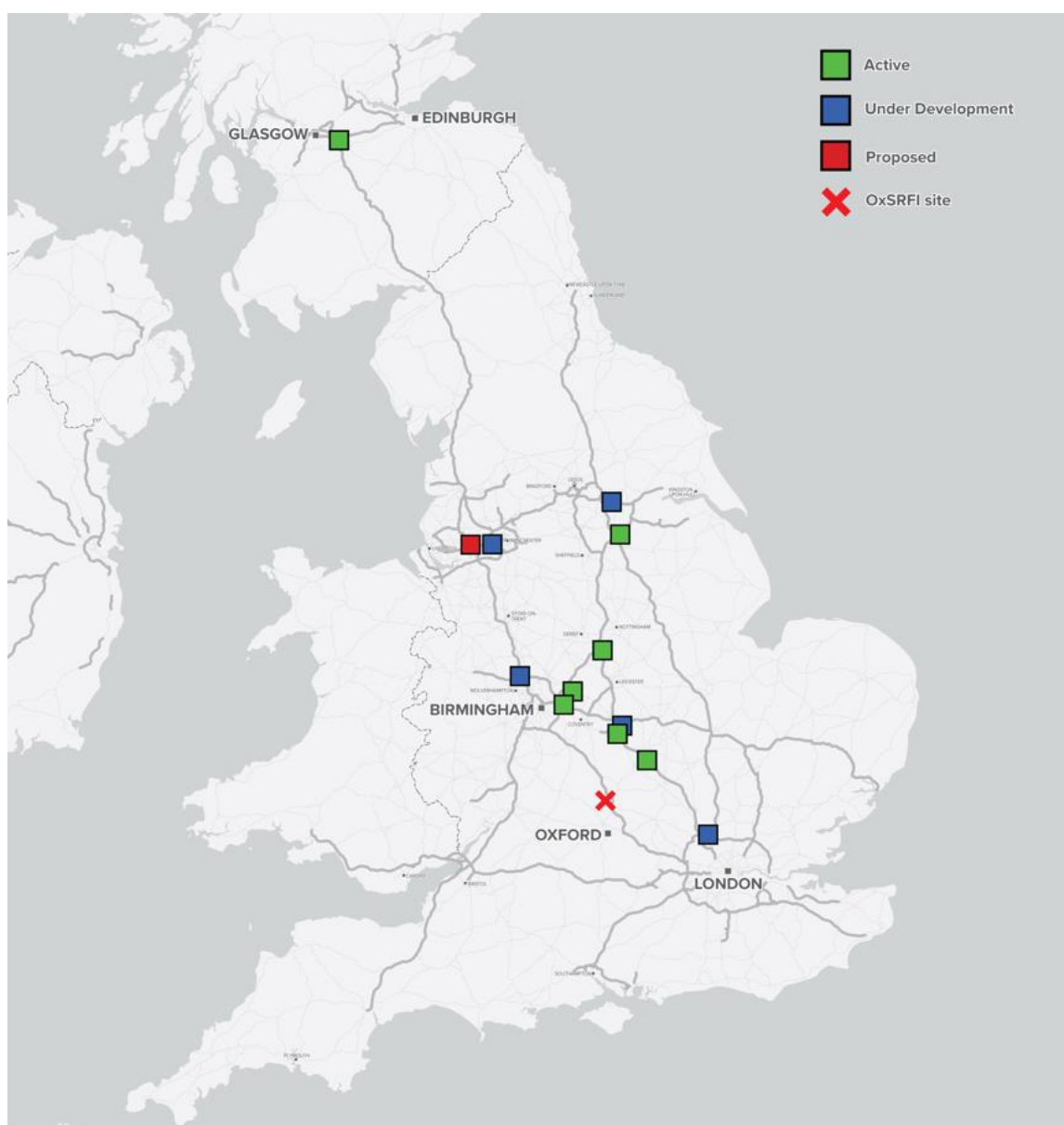


Figure 3 – Existing SRFI Network

3.6 However, even when the consented and proposed SRFIs are considered together, it is apparent that substantial gaps in the national network remain. One of the most striking of these is along the M40 corridor between London and Birmingham, particularly the southern end of this around Oxford and north-west of London. As noted by the NPS, there is a particular gap in the network of large-scale SRFIs in London and the South East²³. Whilst a scheme at Radlett will help meet some market needs, on its own, it is located in the East of England and it would clearly mainly serve its immediate catchment and a small part of the London market.

²³ Paragraph 3.104 of the NPS (Department for Transport, 2024)

- 3.7 Consistent with the NPS, appropriate locations for SRFI are those in high quality strategic locations but also near to major markets and, in this context, the lack of provision around Oxford and along the southern part of the M40 corridor to the north-west of London represents a current gap in the network. This lack of provision has informed the initial ASA Search Area, which is identified in Figure 4 below and which runs linear along the M40 from Junction 11 in the north to Junction 5 in the south.

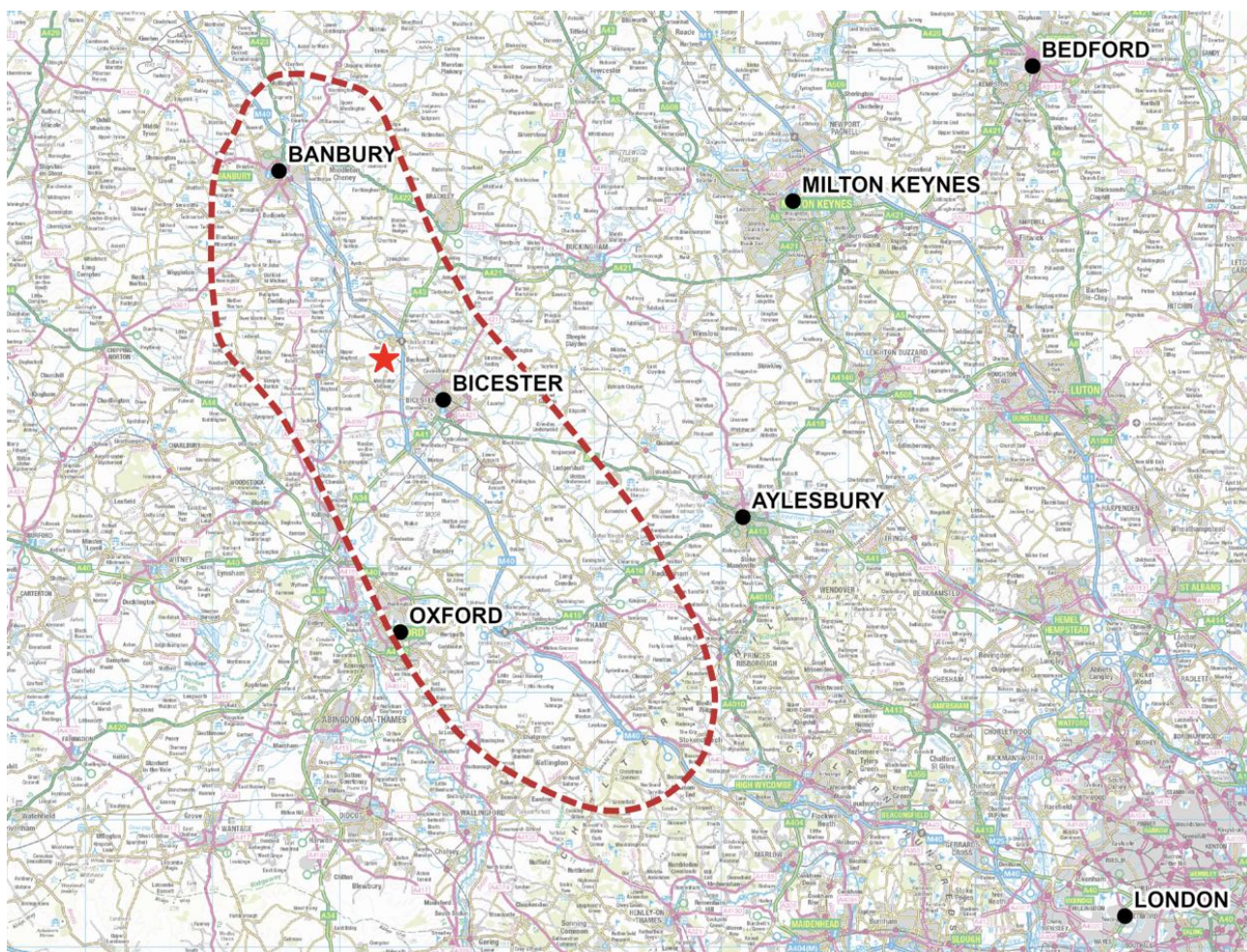


Figure 4: ASA Search Area (OxSRFI site location shown with star)

- 3.8 The Government has identified that there are particular challenges with identifying sites in London and the South East to provide/expand rail freight interchanges serving this region²⁴. The refusal of SRFI schemes at Howbury and Slough (SIFE), and the ongoing delays to the delivery of a scheme at Radlett clearly demonstrates the complexity of delivering SRFIs around London.
- 3.9 As a result, there are currently no SRFIs along the M40 corridor, and none which serve Oxfordshire. An Oxfordshire SRFI would expand the existing network of SRFIs, and fill an identified gap in the national network by meeting the needs of existing and future

²⁴ Paragraph 3.105 of the NPS (Department for Transport, 2024)

businesses in Oxfordshire and national logistics operations. It would also address a market need identified for a SRFI capable of serving areas of Greater London, in particular, the northwest London conurbation, as well as parts of the Midlands. A location close to the M40 is considered essential for this. The market need will be explained further in the Market Report, which should be read in conjunction with the Rail Report and GB Rail Freight's Supporting Report.

4.0 ESTABLISHING THE FOCUS AREAS

Introduction

4.1 Having established the initial Search Area, the next stage of the assessment involved establishing 'Focus Areas' to refine the assessment. These are areas of land that fit the following pre-determined criteria, which is based on both national policy guidance for locating SRFIs and established approaches adopted by previous SRFI applications. It would clearly be inappropriate to consider areas that are not in reasonable proximity to railway or major roads or are in areas which have prohibitive environmental constraints. The key criteria are:

- Proximity to rail infrastructure: located within 5km of an existing rail line on the strategic rail network (as defined by the NPS and shown in Figure 1);
- Proximity to road infrastructure: located within 5km of an existing junction on the Strategic Road Network (as defined by the NPS); and
- Key Environmental Constraints: outside of land designated as a National Landscape²⁵.

4.2 The following sections expand on the above.

Proximity to rail infrastructure

4.3 A viable connection to the strategic rail network is essential for an SRFI. The distance to the rail network will also be an important factor in the deliverability and viability of a site given that a lengthy new line will incur significant costs as well as additional design and environmental considerations. For the purpose of defining an area of search and having regard to the precedent set by ASA's prepared as part of other SRFI applications, a 5km radius from existing rail lines is identified as an appropriate criterion. It is however acknowledged that this is a conservative approach, and it should be noted that the assessment undertaken to support the proposed SRFI at Howbury used a 2 km threshold.

4.4 In accordance with the NPS, an SRFI should ideally be located on a route with a gauge capability of W8 or more or capable of enhancement to a suitable gauge²⁶. Therefore, rail lines that cannot meet W8 or above, or cannot be upgraded to this level, have been discounted from the ASA analysis.

4.5 Figure 5 overleaf shows the strategic railway network within the Search Area.

²⁵ Previously referred to an Area of Natural Beauty (AoNB) – see paragraph 4.20 of the NPS (Department for Transport, 2024)

²⁶ Paragraph 4.82 of the NPS (Department for Transport, 2024)

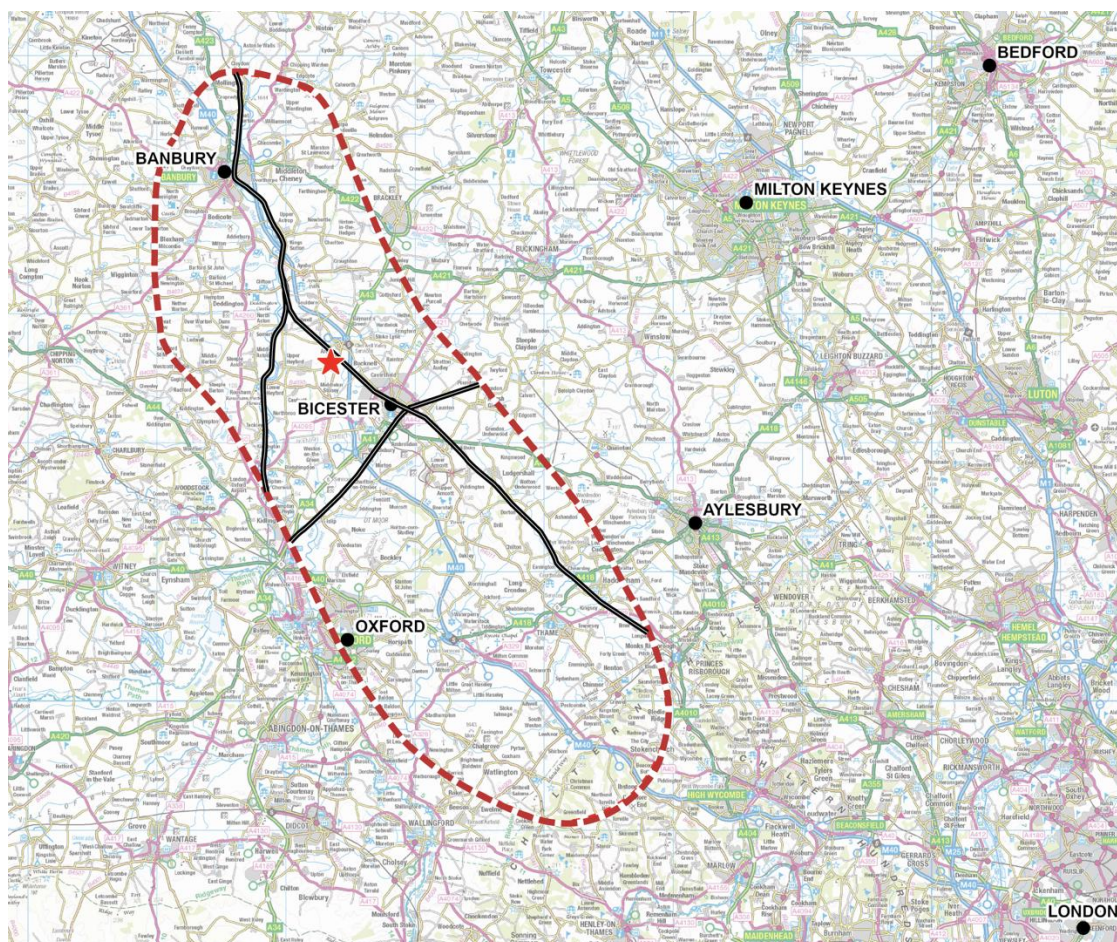


Figure 5 – Rail Network in the ASA Search Area (OxSRFI location indicated by the star symbol).

Proximity to road infrastructure

- 4.6 The NPS states that proposed new SRFIs should have good road access as this will allow rail to effectively compete with, and work alongside, road freight to achieve a modal shift²⁷. Suitable and viable road connections, or the ability for such to be provided, is essential if a site is to be considered an appropriate location for an SRFI. Ease of access to the M40 motorway is also important in order to meet logistics and distribution market requirements.
- 4.7 Figure 6 below shows the strategic road network within the Search Area. It comprises the M40, A34, and A43.

²⁷ Paragraph 4.81 of the NPS (Department for Transport, 2024)

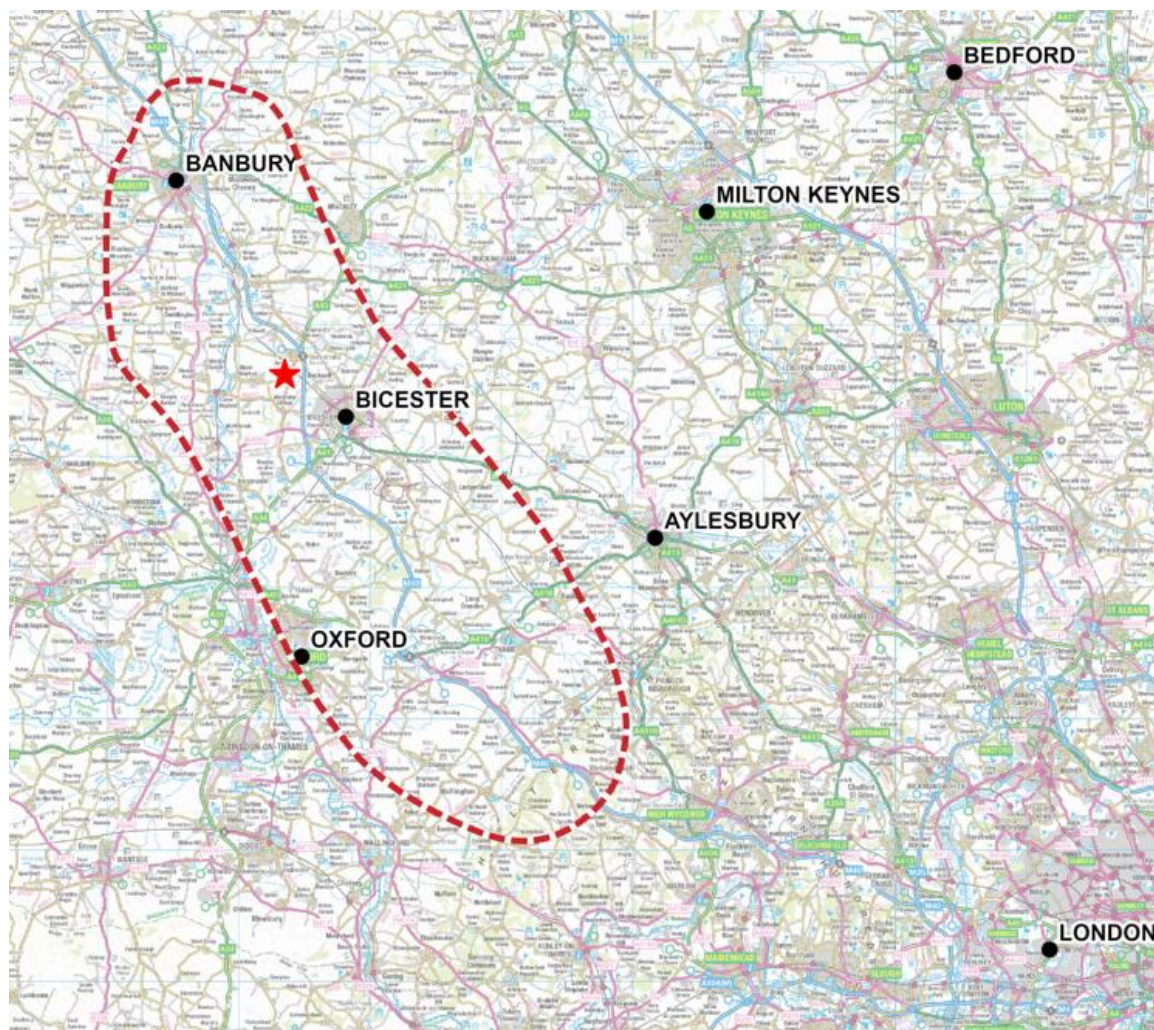


Figure 6 – Strategic Road Network in the ASA Search Area – OxSRFI location shown with red star

- 4.8 It is preferable to connect to existing junctions due to the difficulty in securing consent for new junctions on the strategic road network. National Highways (NH) standard proformas require robust consideration of alternative options for any proposals involving new junctions on these roads. A new junction was considered for OxSRFI before being ruled out as not feasible and undeliverable²⁸. This is due to stringent junction distances on the strategic road network. Therefore, this methodology defines its focus areas as being in reasonable proximity, within 5km, of an existing junction on the strategic road network. Areas beyond 5km are discounted because it is unlikely that a suitable connection could be achieved from an engineering and environmental perspective. It is also considered that areas beyond this distance would not be capable of meeting market requirements for access to the strategic road network.

²⁸ Also see the Design Approach Document, 'DAD', re: scheme evolution.

- 4.9 The 5km threshold has also been used in the ASAs for previous (consented) SRFI applications and is therefore considered by the Applicant to be an accepted locational criterion. It is however considered to be a conservative approach. Areas beyond 2km may have significant viability and engineering issues and will be less able to meet market requirements which are likely to affect deliverability.

Key Environmental Constraints

- 4.10 The NPS sets out a strong presumption against the building of new roads and strategic rail freight interchanges in a National Park, the Broads, and National Landscapes²⁹. It goes on to state that the planning of SRFIs should encourage routes that avoid these areas. Therefore, in establishing the Focus Areas, land within these designated areas has been excluded alongside land beyond 5km from the strategic rail network and from junctions of the strategic road network.

Results

- 4.11 Figure 7 illustrates the resulting areas of land after all the initial criteria had been applied to the Search Area. The resulting areas are highlighted in purple and represent land that is: within 5km of the strategic rail network **and** within 5km of an existing junction on the strategic road network **and** outside of land designated as a National Landscape.
- 4.12 As can be seen in Figure 7, there are few areas where the strategic rail and road networks intersect and where there are no National Landscapes. As shown by the green layer, there are three nearby National Landscapes; North Wessex Downs and the Chiltern Hills to the south (some of which falls within the Search Area) and the Cotwolds area to the north-west.

²⁹ Paragraph 5.171 of the NPS (Department for Transport, 2024)

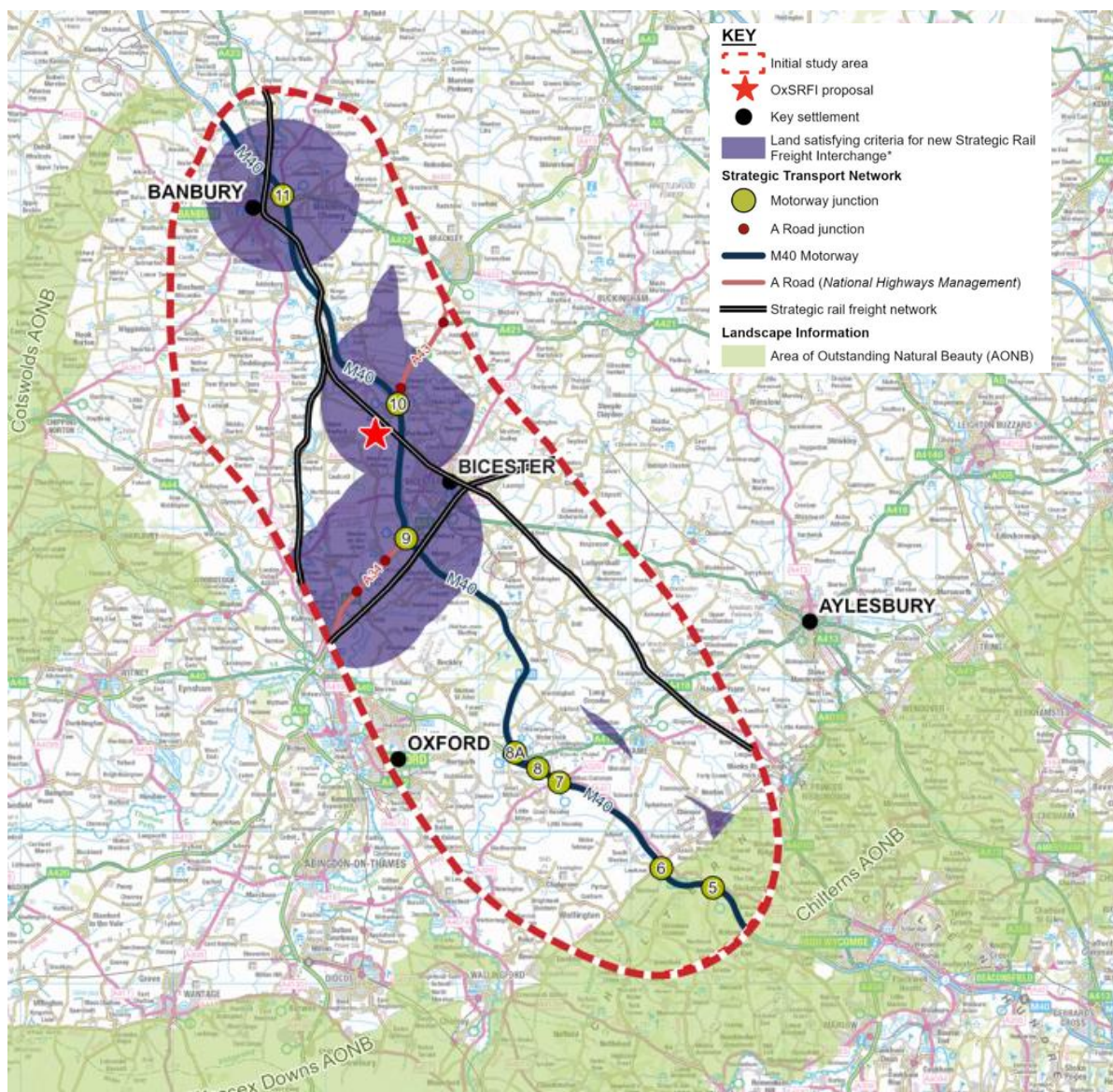


Figure 7 – ASA Focus Areas

4.13 The three larger purple areas around Junctions 9, 10, and 11 of the M40 have been taken forward as the ‘Focus Areas’ by the Applicant. The smaller two areas to the south east of the Search Area are discounted from further consideration due to not being big enough in size and/or bordering a National Landscapes .

4.14 The Focus Areas that have been established are:

- Focus Area 1 – Land around J9 of the M40, Bicester

- Focus Area 2 – Land around J10 of the M40, Ardley
- Focus Area 3 – Land around Junction 11 of the M40, Banbury

5.0 IDENTIFYING THE ‘LONG LIST’ OF POTENTIAL SITES

- 5.1 Building upon the criteria set out in the previous section, a number of sites within the three Focus Areas have been identified for further assessment; these comprise the “Long List”. The process of identifying these Long List sites has been based on professional planning judgement and the process undertaken is summarised in the following paragraphs.
- 5.2 For the purpose of this assessment, a ‘site’ has been defined as an area of land that is at least broadly contained within a defined or definable boundary (or boundaries). A defined boundary includes, for example, roads, railway lines, watercourses, existing development, woodland, and/or other features that contribute to the physical enclosure of an area of land.
- 5.3 In terms of identifying sites, land containing immediately obvious features that would preclude development or present an overriding constraint to a development being consented or delivered was discounted from consideration. Examples include:
- Existing settlements or built-up areas such as towns, villages, business parks, etc;
 - Existing major infrastructure such as strategic roads;
 - Other overriding physical environmental features such as woodlands, waterbodies, etc.
- 5.4 The resulting Long List is therefore sites within the Focus Areas that appear to be both undeveloped and capable of accommodating an SRFI in terms of size and absence of the above types of overriding constraints.
- 5.5 The Long List of sites identified for further assessment comprises the 14 following sites. Their broad locations are illustrated on Figure 8. The broad site boundaries of each area are shown in **Annex B**.

Focus Area 1 (Land around Junction 9) sites:

Site 1.1 – Graven Hill

Site 1.2 – Land west of Merton and east of Wendlebury

Site 1.3 – Land west of Bicester

Site 1.4 - Land east of Weston on the Green

Site 1.5 – Land south of Junction 9

Site 1.6 – Land north of Junction 9

Focus Area 2 (Land around Junction 10) sites:

Site 2.1 - Upper Heyford Former Airfield

Site 2.2 – Land west of the A43

Site 2.3 – Land east of the A43

Site 2.4 – Land north of Bucknell

Focus Area 3 (Land around Junction 11) sites:

Site 3.1 – Land north-east of junction 11

Site 3.2 – Land south-east of junction 11

Site 3.3 – Land north-east of Cherwell Valley Business Park

Site 3.4 – Land south of Middleton Cheney

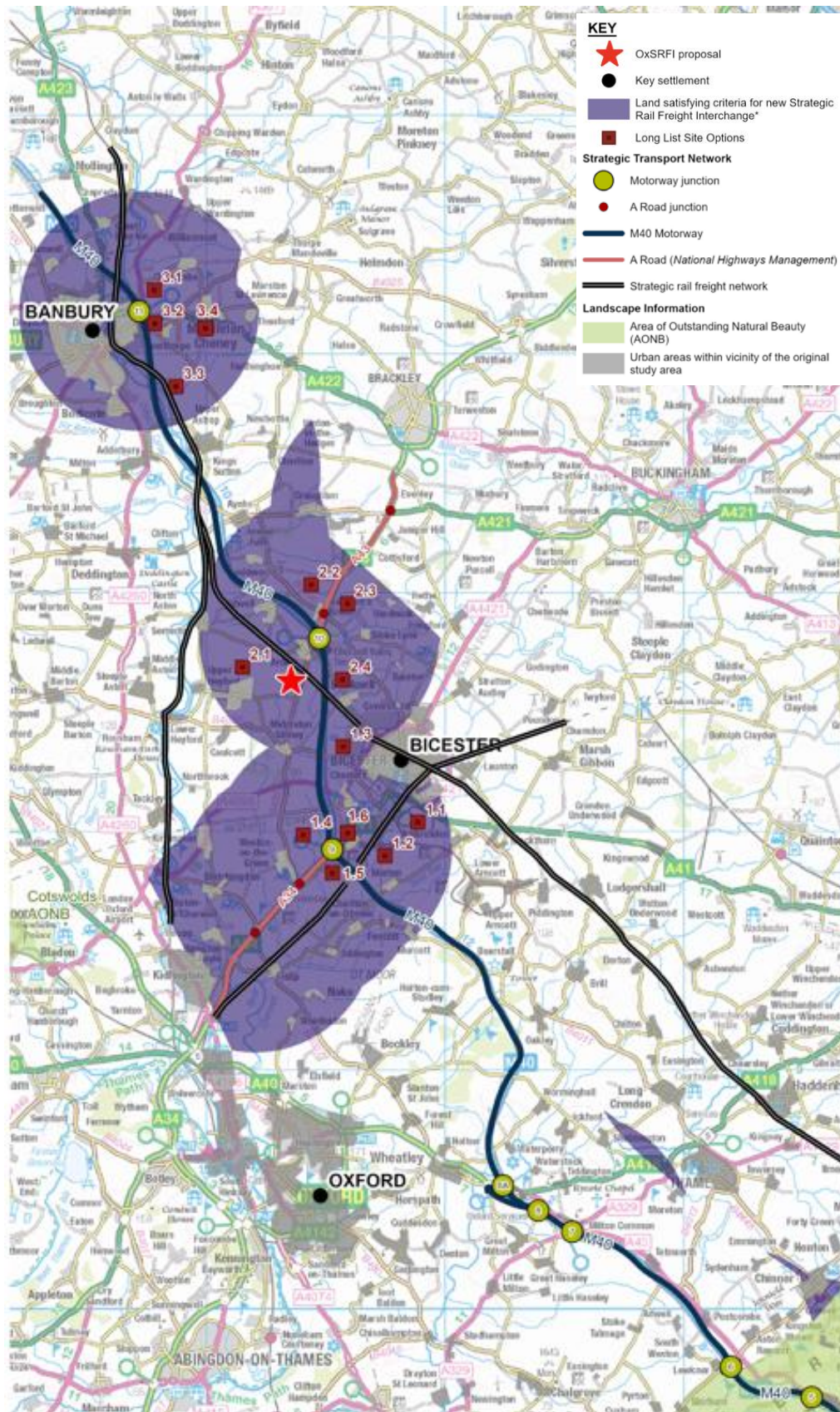


Figure 8 – Long List Sites

6.0 THE LONG LIST SIFTING PROCESS (ESTABLISHING THE SHORT LIST)

6.1 The Long List of sites is subject to an initial sifting process based on the following criteria:

- Connectivity to rail and road;
- Environmental and planning policy constraints;
- Proximity to sensitive uses; and
- Availability.

6.2 The following sections expand on the above criteria.

Connectivity to Rail and Road

6.3 Whilst these areas have already been broadly assessed against proximity to rail and proximity to M40 junctions (when defining the Focus Areas), there may be obvious physical or environmental barriers which would prevent connectivity or make it extremely challenging. In these cases, certain sites have been discounted. For example, whilst the sites are all within 5km of a railway line, there will be varying costs, ownership, and/or engineering issues that differentiate them.

Environmental and Planning Policy Constraints

6.4 Environmental constraints and Local Plan allocations include (but are not limited to) a consideration of:

- Flood Risk according to the Environment Agency (EA) Flood Risk maps;
- Heritage Assets such as Scheduled Monuments or Listed Buildings identified on Historic England maps;
- Ecology designations such as SSSIs, Ancient Woodland, and other statutory ecological designations identified on DEFRA's Magic Map;
- Topography;
- Adopted Local Plan allocations for development; and
- Other adopted Local Plan policy constraints (such as where land is safeguarded for a particular type of development).

6.5 These constraints are considered on a site-by-site basis within the sifting process.

Proximity to Sensitive Uses (i.e., residential)

6.6 A site's proximity to sensitive uses is also an important consideration. The NPS states:

"SRFIs tend to be large scale commercial operations, which are most likely to need continuous working arrangements (up to 24 hours). By necessity they involve large structures, buildings and the operation of heavy machinery. In terms of location

*therefore, they may not be considered suitable adjacent to residential areas or environmentally sensitive areas... However, depending on circumstances, appropriate mitigation measures may be available to limit the impacts of visual intrusion, noise and light.*³⁰

Availability

- 6.7 A site’s availability is vital to establishing feasibility and deliverability. For the purpose of this assessment, a site is considered ‘unavailable’ if it contains a known active use/s or planning permission that presents a land use conflict across a significant part of the site and/or would prevent the delivery of an SRFI by its nature (e.g., through the presence of sensitive receptors).
- 6.8 Availability in terms of land ownership/potential for acquisition is not considered as this is an unknown factor.

Results of Sifting Process

6.9 The long list of sites has been filtered using the above criteria and the results are set out using a traffic light colour scheme scoring basis. The table below represents each site’s performance against the identified criteria as follows:

- **Green** – No significant constraints identified;
- **Amber** – Constraint(s) identified however there is potential to overcome through mitigation and/or engineering;
- **Red** – Overriding constraint(s) identified rendering the site unsuitable for a SRFI development.

Table 1: Long list of sites – sifting process (refer to Annex B for the site area plans)

| Ref | Site Name | Rail connectivity | Road connectivity | Environmental and/or Local Plan Policy Constraints | Proximity to Sensitive Uses | Availability |
|-----|---------------------------------------|-------------------|-------------------|--|-----------------------------|--------------|
| 1.1 | Graven Hill | Green | Amber | Red | Amber | Red |
| 1.2 | North of Merton & South of Wendlebury | Green | Green | Red | Amber | Green |
| 1.3 | North West of Bicester | Green | Amber | Red | Amber | Red |
| 1.4 | Land East of Weston on the Green | Amber | Green | Amber | Amber | Red |
| 1.5 | Land South of Junction 9 | Green | Green | Red | Green | Green |
| 1.6 | Land North of Junction 9 | Amber | Green | Amber | Green | Red |
| 2.1 | Upper Heyford Former Airfield | Green | Amber | Red | Amber | Red |

³⁰ Paragraph 4.83 of the NPS (Department for Transport, 2024)

| | | | | | | |
|-----|---|--|--|--|--|--|
| 2.2 | Land West of A43 | | | | | |
| 2.3 | Land East of A43 | | | | | |
| 2.4 | Land North of Bucknall | | | | | |
| 3.1 | Land Northeast of J11 | | | | | |
| 3.2 | Land Southeast of J11 | | | | | |
| 3.3 | Land Northeast of Cherwell Valley Business Park | | | | | |
| 3.4 | Land south of Middleton Cheney | | | | | |

6.10 The outcome of the sifting process is that 11 of the 14 sites failed to meet one or more of the fundamental criteria; commentary on each of the 11 sites sifted out from the long list sites is set out below.

Focus Area 1 – land around Junction 9

Site 1.1 – Graven Hill

6.11 This site is allocated in the adopted Cherwell Local Plan under Policy Bicester 2 which includes proposals for 2,100 new homes and 26 ha for employment (B-use). Development on the site has already begun (at least 511 homes completed³¹). The site is also retained as an allocated site in the draft Cherwell Local Plan³². The site is therefore not available.

Site 1.2 – Land north of Merton & south of Wendlebury

6.12 This majority of the site is located on land in Flood Zone 3 which triggers the need for the Sequential Test³³. In addition, the need to mitigate the flood risk would likely result in the development being more complex in engineering terms and therefore less viable. It could also reduce the developable area. The new east-west rail connection is acknowledged but on the basis of the environmental constraints within the site, and given the anticipated costs of the likely engineering works, the site has been ruled out as an appropriate location for an SRFI.

Site 1.3 – Land north west of Bicester

6.13 A significant portion of this site is subject to an allocation in the Local Plan known as 'Bicester 1' 6,000 new homes and between 700-1,000 new employment (B-use) jobs.

³¹ Cherwell Annual Monitoring Report 2023-24 (June 2025)

³² The Cherwell Local Plan Review 2042 – the regulation 19 consultation was completed in February 2025, and the plan was submitted for Examination in July 2025.

³³ See GOV.UK Guidance on 'Flood risk and coastal change' at: <https://www.gov.uk/guidance/flood-risk-and-coastal-change#the-sequential-approach-to-the-location-of-development>

Development on the site has already begun (at least 412 homes completed³⁴). The site is also retained as an allocated site in the draft Cherwell Local Plan³⁵. The site is therefore not available.

Site 1.4 – Land East of Weston on the Green

- 6.14 As well as the area being some distance away from the rail line, a rail connection to this site would require crossing over both the B430 and the A34 which would have significant and likely prohibitive cost implications. The road and rail accesses would also be located in the Green Belt, triggering the need to demonstrate very special circumstances sets out in the NPS³⁶. The site is ruled out on the basis of deliverability.

Site 1.5 – Land South of Junction 9

- 6.15 The majority of this site is located in the Oxford Green Belt. The part of the site that is outside of Green Belt, closest to Junction 9, amounts to only circa 45 hectares which is too small to accommodate an SRFI. Therefore, a site in this location would be mostly located in the Green Belt. The road and rail accesses would also be located in the Green Belt, triggering the need to demonstrate very special circumstances as set out in the NPS³⁷.

- 6.16 The site is also constrained to the west by environmental factors which comprise:
- the Woodsides Meadow Nature Reserve – which is part of is part of the internationally important Wendlebury Meads and Mansmoor Close SSSI³⁸ which is a large group of meadows that have largely escaped agricultural improvement³⁹;
 - the Wormough Copse woodland;
 - an area of Flood Zone 3 (high risk) as identified on the EA's flood risk map.

- 6.17 These factors are likely to be a constraint on the extent of development and limit the extent of land available for an SRFI.

- 6.18 Considering the environmental constraints, and the sites location in Green Belt, the site is not considered to be better located, nor preferable as an alternative.

Site 1.6 – Land north of Junction 9

³⁴ Cherwell Annual Monitoring Report 2023-24 (June 2025)

³⁵ The Cherwell Local Plan Review 2042 – the draft plan was submitted to the Secretary of State in July 2025

³⁶ Paragraph 5.203 of the NPS (Department for Transport, 2024)

³⁷ Paragraph 5.203 of the NPS (Department for Transport, 2024)

³⁸ Berkshire, Buckinghamshire & Oxfordshire Wildlife Trust: <https://www.bbowl.org.uk/nature-reserves/woodsides-meadow>

³⁹ Oxfordshire Wildlife & Landscape Study: <https://owls.oxfordshire.gov.uk/wps/wcm/connect/occ/OWLS/Home/Oxfordshire+Districts/Oxfordshire+Districts+-+Parishes/Cherwell+Parishes/Charlton-on-Otmoor/>

- 6.19 This site is predominantly covered by land which is proposed to be allocated for employment development in the Draft Cherwell Local Plan under policies E1, E2 and E3. A large part of the site already has planning permission for employment development⁴⁰ with a further application also currently being considered⁴¹. The site is therefore considered to not be available. Furthermore, in order to gain a rail access, the site would require the railway to crossover the A41 which would have significant cost implications. In addition, the site area is in close proximity to the village of Chesterton which would require mitigation to minimise amenity impacts. Given these constraints, the site is unlikely to be an appropriate alternative.

Focus Area 2 – land around Junction 10

Site 2.1 – Upper Heyford Former Airfield

- 6.20 The majority of this site is subject to an allocation in the Local Plan, with the site retained as an allocated site within the draft Cherwell Local Plan⁴². The site is allocated for the delivery of 1,600 new homes and approximately 1,500 new employment (B-use) jobs. The land is owned by Dorchester Group who have plans to promote other areas of the site for future residential development⁴³. This site is therefore unavailable.

Site 2.2 – Land west of A43

- 6.21 This site is located between the M40 and A43, north of Junction 10. The development of a SRFI would require the rail connection to cross over (or under) the M40 which would have significant – and likely prohibitive – cost implications. There are two villages (Fritwell and Ardley with Fewcott) which are located between the site and the rail line which would likely be subject to unacceptable environmental impacts. Furthermore, part of the site is covered by a recently resolved to be approved planning application for employment development by Albion Land⁴⁴. The site has been discounted due to not being considered deliverable and/or available.

Site 2.3 – Land east of A43

- 6.22 This site is located to the east of the A43 and north-east of Junction 10 of the M40 (where the A43 starts/splits off towards Northampton). The development of a SRFI here would require the rail connection to cross over (or under) the M40 which would have significant – and likely prohibitive – cost implications. The village of Stoke Lyne would also likely be unacceptably impacted given its proximity to the site area.

⁴⁰ Cherwell planning reference: 22/01144/F

⁴¹ Cherwell planning reference: 25/00284/F

⁴² The Cherwell Local Plan Review 2042 – the draft plan was submitted to the Secretary of State in July 2025

⁴³ A Planning Application for a new village of approx.. 9000 additional homes was submitted to Cherwell District in summer 2025.

⁴⁴ Albion land application references 21/03267/OUT, and 21/03268/OUT.

Furthermore, part of the site is covered by separate proposals including the live application by Albion Land which received a resolution to grant consent but has not yet been determined by Cherwell District Council (and a still live planning application by Tritax⁴⁵). The site has been discounted due to not being considered deliverable and/or available.

Focus Area 3 – land around Junction 11

Site 3.1 – Land north-east of Junction 11

- 6.23 The development of a SRFI on this site would require puncturing through a number of environmental designations, land reserved for water storage, and crossing a canal to achieve a railway link. This would likely have significant environmental impacts and incur significant costs given the increased complexity from an engineering and design (and cost) perspective. Furthermore, part of the site is also covered by a separate planning application for employment development by Greystoke, which was recently refused at appeal. The site is therefore not considered deliverable and/or available as a result.

Site 3.3 – Land north-east of Cherwell Valley Business Park

- 6.24 This site is partially located within a Special Landscape Area, partially located in Flood Zones 3 and 2, and is over 3km from the nearest motorway junction. The development of a SRFI here is considered likely to have significant impacts from an environmental and flood risk perspective which are, when combined, considered overriding.

⁴⁵ Tritax Bigbox application reference 22/01340/OUT.

7.0 ASSESSMENT OF SHORT LIST SITES

7.1 This section sets out a more detailed, site-specific assessment for the three sites that have not been discounted from the Long List in Section 6.0, which were Site 2.4 (Land north of Bucknall), Site 3.2 (Land south-east of Junction 11) and Site 3.4 (Land south of Middleton Cheney).

Site 2.4 – Land north of Bucknall

7.2 This site is located to the north of Bucknell village and is bordered by the M40 to the west. It is immediately south-east of Junction 10 of the M40, and immediately north-east of the Chiltern Main Line railway line. A potential site outline is shown in Figure 9 below; the size of this indicative area is 215 ha.



Figure 9 – Land North of Bucknall

7.3 The section of railway line that borders the site is in close proximity to Bucknell village. A new rail connection would need to bypass the village and a small cluster of properties to the north-west of the village.

-
- 7.4 It is considered likely that significant mitigation would be required to ensure acceptable levels of noise and visual amenity for Bucknell residents given that the railway movements and rail operations are where the highest levels of noise tend to occur at SRFIs (e.g., from loading/unloading shipping containers).
- 7.5 As illustrated by a brown layer on Figure 10 below (extract from Cherwell District Council's Interactive Adopted Policies Map⁴⁶), the site contains two areas of Ancient Woodland (including replanted ancient woodland) and borders another two, which would impact the master planning of the site and reduce the overall developable area. Figure 10 also highlights a number of local ecological designations including NERC Act S41 Habitats (previously UKBAP) (purple layer), a Local Wildlife Site and protected Green Space (the large green area to the north) and a Conservation Target Area (hatched orange). Finally, the green dashed line indicates public rights of way which cross the site.

⁴⁶ Cherwell District Council's Interactive Adopted Policies Map:
<https://www.cherwell.gov.uk/info/83/local-plans/216/interactive-adopted-policies-map>

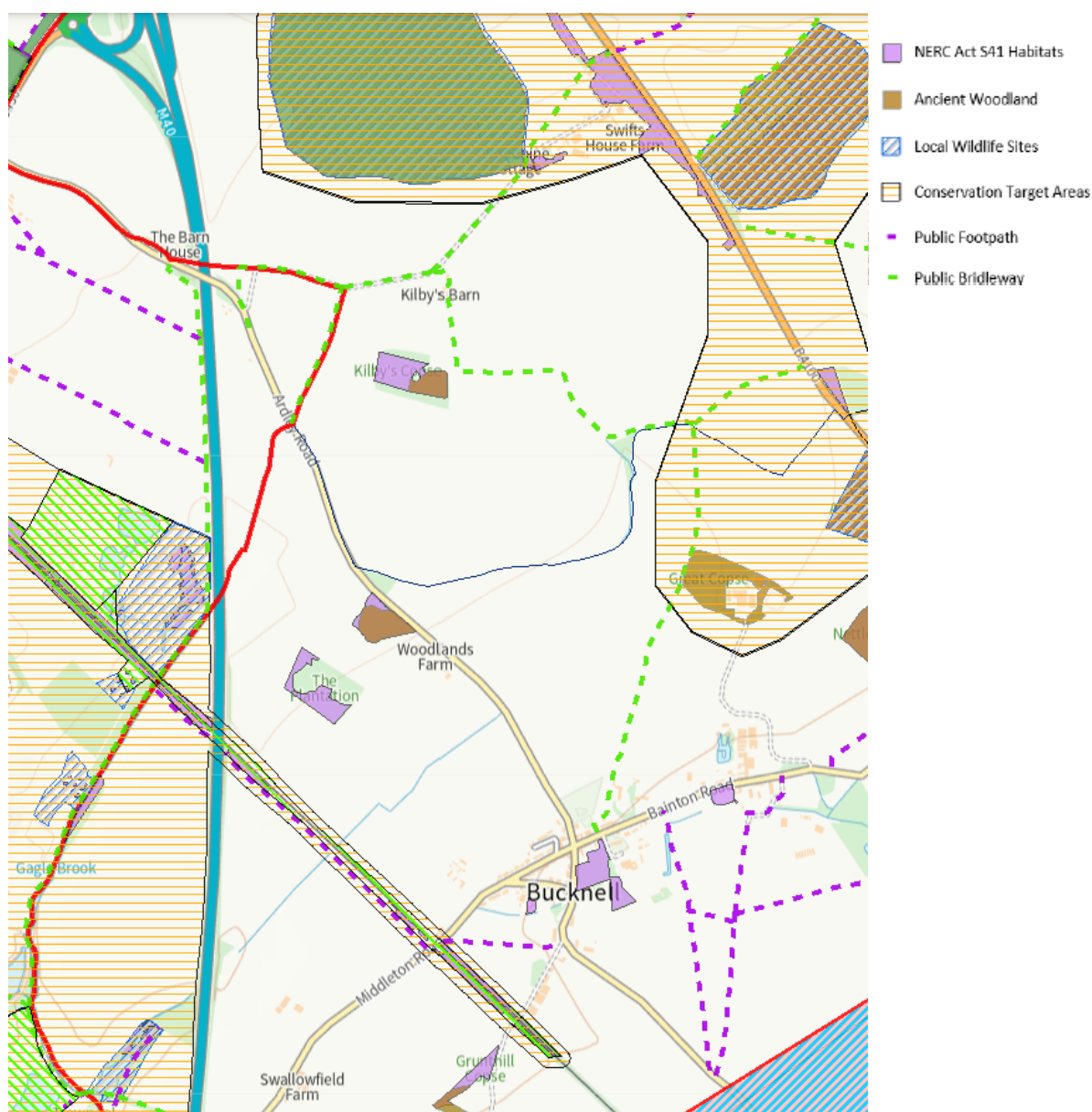


Figure 10 – Policy map extract for Land North of Bucknell

- 7.6 When considered collectively, these factors will constrain the development of this area, significantly restricting the land potentially available for development. In particular there is likely to be a need to set development away from the village of Bucknell, and to not extend into the protected green space/local wildlife site to the north.
- 7.7 In addition to the above constraints, part of the site to the east has been proposed for tourism development by Puy du Fou (see red line plan in Figure 11), with a planning application recently validated in August 2025⁴⁷ which limits the availability of the site for an SRFI development.

⁴⁷ Cherwell planning reference: 25/02232/OUT

**Site 3.2 – Land south-east of Junction 11 and
Site 3.4 – Land south of Middleton Cheney**

- 7.9 Due to the close proximity of Site 3.2 and Site 3.4 to one-another and given, there are several similar environmental and policy matters, these potential sites have been considered together. Any relevant differences are however noted.

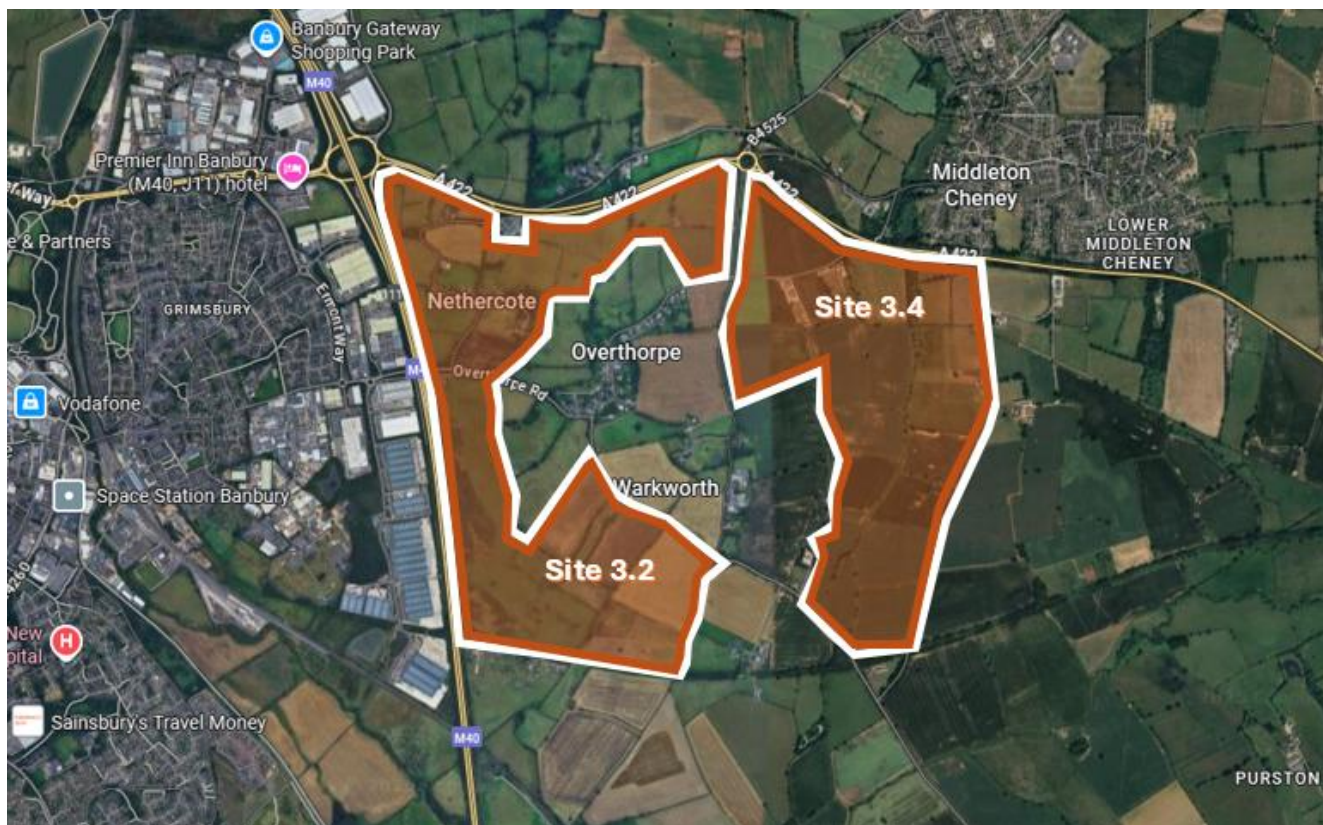


Figure 12 – Land south-east of Junction 11 (3.2) and Land south of Middleton Cheney (3.4)

- 7.10 Site 3.2 comprises an area of undeveloped land immediately east of the M40 and Banbury, and south of the A422. It is bordered by the villages of Overthorpe and Warkworth on the east, with the Nethercote community within the site towards the northern boundary. A potential site outline is shown in Figure 12; the size of this indicative area is 130 ha.
- 7.11 A road connection to this site could be taken off Junction 9 or the A422/B4525 Middleton Cheney roundabout. It is assumed for the purposes of this assessment that the A422 is a 'motorway standard' road given it is a dual carriageway up to this roundabout.
- 7.12 Site 3.4 comprises a large area of undeveloped land further to the east of Site 3.2, south of Middleton Cheney. It is bordered by the A422 to the north and the villages of Middleton Cheney and Lower Middleton Cheney are situated immediately beyond. Overthorpe and Warkworth villages are located in close proximity to the west. A potential site outline is shown in Figure 12; the size of this indicative area is 133 ha.

- 7.13 A road connection to this site would need to be taken off the A422/B4525 Middleton Cheney roundabout.
- 7.14 As can be seen in Figure 12, both sites are located north and north-east of the Chiltern Main line, however there is a disused railway line in between the Chiltern line and both sites (which forms the southernmost border of both indicative site areas). The disused railway line is now a designated Green Infrastructure Corridor. Therefore, whilst both sites are in relatively close proximity to the Chiltern Main line, a new rail connection in this area would require crossing the Green Infrastructure Corridor.
- 7.15 A key constraint of both sites is considered to be the fact that they are either predominantly (Site 3.2) or wholly (Site 3.4) located in either a “Special Landscape Area” (under saved policy EV7 of the South Northamptonshire Local Plan) or an “Important Local Gap” (under saved policy EV8). These are shown on Figure 13 below. Whilst these are only local designations (as opposed to statutory), they are significant constraints that weigh against the principle of built development in this area for both sites.

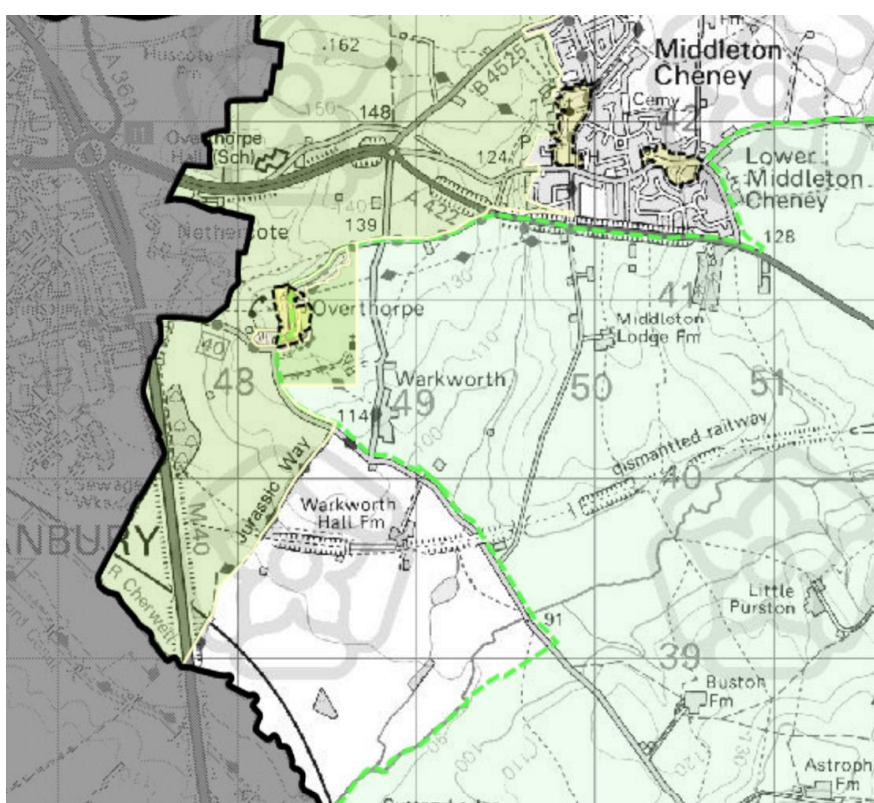


Figure 13 – South Northamptonshire Local Plan Policies Map Extract

- 7.16 There are constraints in relation to the topography in the area with significant gradient changes west of Overthorpe (Site 3.2) and east of Warkworth (Site 3.4) (see Figure 14). Site 3.2 is greatly constrained by the topography along its eastern boundary where it wraps around Overthorpe. Site 3.4 lies in a valley with relatively steep gradient both eastward and westward. It is not clear whether an appropriate development plateau could be created to accommodate large scale warehousing on either site.

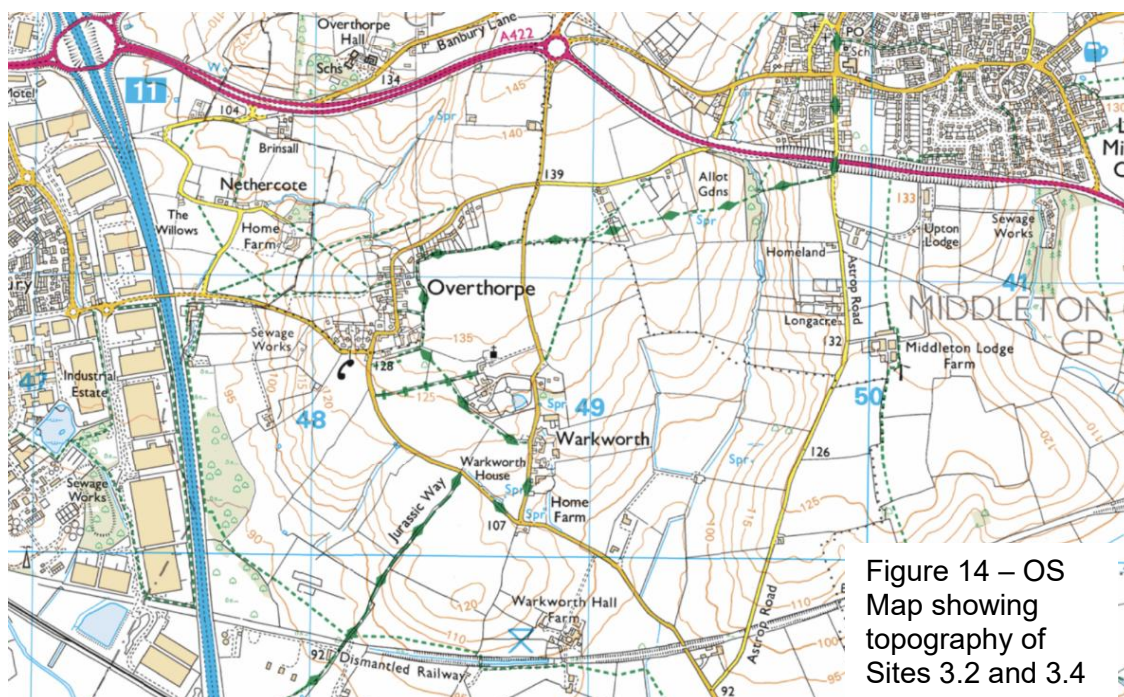


Figure 14 – OS Map showing topography of Sites 3.2 and 3.4

- 7.17 There are also known heritage constraints within this area. The route of a new rail connection northward from the Chiltern Main Line to either Site 3.2 or Site 3.4 would need to consider a Scheduled Monument (Former World War I National Filling Factory, Banbury) which is identified on Figure 15 below. The Scheduled Monument is within the area of Site 3.2 and would therefore be a constraint to the extent of potential development.
- 7.18 Figure 15 also highlights the number of listed buildings which are in close proximity to both site areas, and Figure 16 illustrates the Overthorpe Conservation Area (red hatched layer). These constraints would all require consideration as part of the masterplanning process.

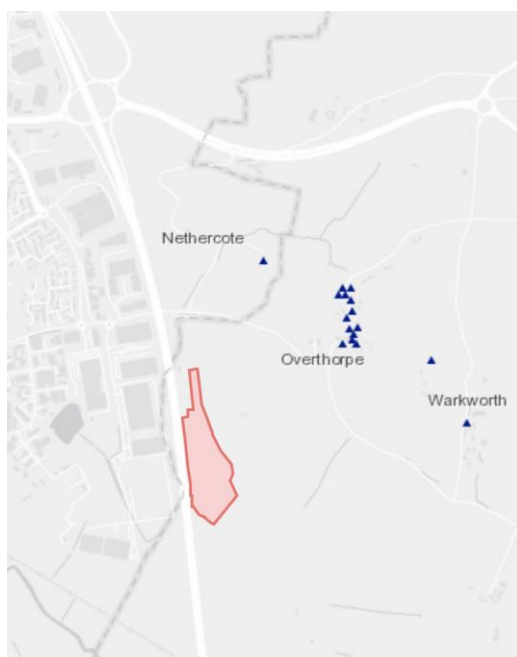


Figure 15 – Heritage assets on Historic England website

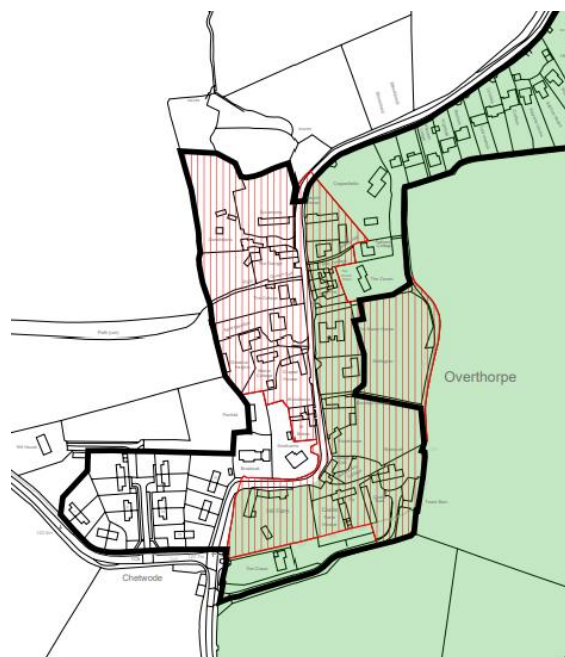


Figure 16 – Map of Overthorpe Conservation Area

- 7.19 Furthermore, both sites are in close proximity to a number of residential communities; both within and in close proximity to their areas. This creates a twofold constraint; the need to acquire those within and the need to mitigate impacts on those in close proximity.
- 7.20 For the reasons above, whilst both sites meet the core criteria for a SRFI, it is considered that upon closer review, neither are considered suitable for an SRFI and are not therefore considered to be suitable alternative sites.

8.0 SUMMARY AND CONCLUSIONS

- 8.1 This ASA has set out the Applicant's consideration of potential reasonable alternative sites for the proposed OxSRFI development. The ASA has identified and assessed a number of potential alternative sites for accommodating a SRFI development using a robust methodology informed by NPS guidance and professional planning judgement.
- 8.2 The ASA focused on an identified gap in the existing national network along the M40 corridor in Oxfordshire to establish an initial "Search Area". Following the application of an initial core criteria (based on NPS guidance), "Focus Areas" were established and within these areas, a "Long List" of potential alternative sites was identified based on professional planning judgement.
- 8.3 Further analysis of the Long List led to the removal of the majority of these due to having overriding constraints such as environmental, planning policy, proximity to sensitive uses, and/or availability.
- 8.4 The final "Short List" comprised only three sites. Upon assessment, these sites were considered **not suitable** as alternative sites when compared to the OxSRFI site from a planning and environmental perspective.
- 8.5 The findings of this ASA have therefore demonstrated that the OxSRFI is the most preferable site within the established Search Area for the delivery of a SRFI.

ANNEX A – Response to potential alternative sites suggested by Cherwell District Council

The following table sets out the Applicant's views on the list of sites put forward by Cherwell District Council for consideration as part of the alternative sites assessment.

| Site description and locality | Reference (where applicable) | Applicant response |
|---|---|--|
| Sites around M40 Junction 8a | n/a | This area is outside the identified focus areas (see Figure 7). |
| Sites around M40 Junction 9 | Application refs..25/00284/F and 24/03259/F Draft Local Plan Policies E1, E2, E3, E4 and E5 | Land around Junction 9 was included within the assessment as part of Focus Area 1 (see Figure 8). As a result of the sifting process no sites were identified for the short list as potential alternative sites (see Section 6.0). |
| Sites around M40 Junction 10 | Application refs: 21/03267/OUT, 21/03268/OUT and 22/01340/OUT | Land around Junction 10 was included within the assessment as part of Focus Area 2 (see Figure 8). As a result of the sifting process only one site (Site 2.4) was identified for the short list as a potential alternative site (see Section 6.0). The conclusion of the more detailed assessment found that this area would not be suitable for an SRFI and is not therefore an alternative. |
| Sites around M40 Junction 11 | n/a | Land around Junction 11 was included within the assessment as part of Focus Area 3 (see Figure 8). As a result of the sifting process two sites (Site 3.2 and 3.4) were identified for the short list as a potential alternative sites (see Section 6.0). The conclusion of the more detailed assessment found that this area would not be suitable for an SRFI and is not therefore an alternative. |
| Sites around M40 Junction 12 | n/a | This area is outside the identified search area (see Figure 4). |
| Heyford Park site | Local Plan ref: Policy Villages 5, Former RAF Upper Heyford (forms the majority of the allocation) Draft Local Plan ref: Policy HEY 1 Heyford Park Strategy Application refs: 10/01642/OUT, 18/00825/HYBRID and 24/02129/SCOP | The area of this site is included as Site 2.1 in the long list (Section 6.0). The assessment notes the promotion of the site by Dorchester and concludes that the site is unavailable. |
| Sites along the A34 towards Kidlington and Oxford | n/a | Land around Junction 9, including along the A34, was included within the assessment as part of Focus Area 1 (see Figure 8). This included Sites 1.4 and 1.5 which are located along the A34 and south of Junction 9. Given the existing considerations referred to in Section 5.0, no other sites along the A34 were identified for the long list. As a result of the sifting process Sites 1.4 and |

| | | |
|---|---|---|
| | | 1.5 were not identified for the short list as potential alternative sites (see Section 6.0). |
| Sites along the A43 north east into West Northants. | n/a | Land around Junction 10, including along the A43, was included within the assessment as part of Focus Area 2 (see Figure 8). This included Sites 2.2 and 2.3 which are located along the A43 and north east of Junction 10. Given the existing considerations referred to in Section 5.0, no other sites along the A43 were identified for the long list. As a result of the sifting process Sites 2.2 and 2.3 were not identified for the short list as potential alternative sites (see Section 6.0). |
| MOD Site at Graven Hill, Bicester | Application ref: 22/01829/OUT | The area of this site is included as Site 1.1 in the long list (Section 6.0). The assessment notes the existing allocation and progress of new homes on site and concludes the site is not available. |
| Wretchwick Green, Bicester | Application ref: 16/00861/HYBRID | This site put forward is already developed, and therefore not available, and is also outside the identified focus areas (see Figure 7). |
| Northwest Bicester allocation | Adopted Local Plan ref: Policy Bicester 1, NW Bicester Eco-Town Draft Local Plan ref: Policy BIC H1 NW of Bicester Application ref: 20/02454/REM & 21/03177/F | The area of this site is included as Site 1.3 in the long list (Section 6.0). The assessment notes the existing allocation and progress of new homes on site and concludes the site is not available. |
| Former RAF Bicester site | Application ref: 21/01224/OUT | This area is outside the identified focus areas (see Figure 7). |
| Bicester Gateway Business Park | Application ref: 24/01372/F | Land around Junction 9, including along the A41, was included within the assessment as part of Focus Area 1 (see Figure 8). This included Site 1.2 which located north of Merton and south of Wendlebury. Given the existing considerations referred to in Section 5.0, no other sites along the A41 were identified for the long list. As a result of the sifting process Site 1.2 was not identified for the short list as potential alternative sites (see Section 6.0). |
| Oxford Technology Park, Kidlington | Application ref: 23/00517/F | This area is outside the identified focus areas (see Figure 7). |
| Begbroke Science Park, Kidlington | Application ref: 23/02098/OUT | This area is outside the identified focus areas (see Figure 7). |
| Gaydon, Stratford on Avon District | Application Refs: 23/01054/OUT and 25/01765/FUL | This site is outside the identified search area (see Figure 4). |

ANNEX B: Individual Site Area