Submission ID: S62165570

Dear Sirs,
Please find enclosed a copy of Written Representation including Summary of Content exceeding 1500 words submitted on behalf of Dorchester Living
Please also accept this as a formal request to appear at CAH2 and ISH3 as set out more fully in the Written Representation.
Yours Faithfully
[redacted]
On behalf of Dorchester Living

Written Representation by Dorchester Living

Planning Act 2008 - Application by Oxfordshire Railfreight Limited

The Oxfordshire Strategic Rail Freight Interchange (OxSRFI) Development Consent Order

Planning Inspectorate Reference: TR050008

Relevant Representation reference: RR-037

Deadline 1 - 13 October 2026

Dated 13 October 2026

Summary of Written Representation

Introduction	DL recognises national rail freight objectives. Its position on OxSRFI depends on adequate assessment and secured mitigation of effects on Heyford Park and justification of the compulsory acquisition powers sought.
Representations	**1. Strategic Relationship with Heyford Park** Heyford Park is a strategic brownfield development recognised by central government (Matthew Pennycook MP letter appended). The wider 9,000-dwelling application is expected at committee this year, with determination expected before the DCO decision. DL considers that the Applicant has not adequately assessed this proposal. • DL requires assessment of the wider masterplan and delivery programme during the Examination, identifying effects and securing measures to protect its delivery. **2. Landscape and Western Interface** The Applicant has improved the western interface, but the adequacy and timing of mitigation remain unresolved, particularly at Parcel 23, the Link Road and approaches to Heyford Park. • DL requires coordinated landscape, noise, lighting and drainage mitigation, secured through DCO Requirements and a binding agreement. • Early bunding and planting, necessary mitigation before warehouse occupation and interim protection during construction must be secured alongside Link Road delivery. • Controls must address night-time effects of 24-hour operation, including HGVs, forklifts, reversing alarms and yard lighting, together with runoff from screening mounds. **3. Passenger Rail and Requirement 5** The remaining rail concerns relate to future Ardley Station and Requirement 5, which permits approximately 2.5 million sq ft of warehouse occupation before the freight terminal is available. • DL requires safeguarding of station access, including an enhanced footpath/bridleway through OxSRFI, with delivery and maintenance secured. • Requirement 5 must adequately control the amount and duration of warehouse occupation before the terminal opens and secure timely rail operation. **4. Compulsory Acquisition** The Applicant seeks permanent acquisition of six DL plots, including land affecting infrastructure delivery under existing Heyford Park commitments. • DL requires plot-specific justification of the interests sought and demonstration that lesser interests or contractual arrangements would not suffice. • Necessary amendments to planning obligations and replacement infrastructure arrangements must be agreed with OCC and CDC, with associated costs met by the Applicant, before acquisition or works prevent delivery.

	5. Transport and Utilities DL understands that the Applicant's transport modelling has not adequately tested the cumulative effects of OxSRFI alongside the wider 9,000-dwelling Heyford Park masterplan. Continued access and protection of future utility infrastructure also remain unresolved. • DL requires cumulative modelling of the two schemes, identifying capacity constraints, necessary mitigation and delivery responsibilities, together with phased arrangements maintaining construction and operational access. • A practicable private wire route from Ardley must be safeguarded, with utilities and shared infrastructure coordinated. **6. Engagement and Agreement** DL remains willing to reach agreement, but continuing discussions do not secure the necessary safeguards. • DL requires a binding legal agreement supplementing DCO Requirements, covering interface works, phasing, operational controls, infrastructure, maintenance and dispute resolution.
Conclusion	Heyford Park is a strategic brownfield development whose importance is recognised by central government. The 9,000-dwelling application is expected to go to committee this year, with a decision before determination of the DCO. DL considers that the Applicant has not adequately assessed this wider proposal. If OxSRFI proceeds, the two schemes must be capable of working together without prejudicing the delivery of Heyford Park. DL therefore requires the landscape and wider interface to be controlled through DCO Requirements and a binding legal agreement, including coordinated phasing, early landscape works and delivery of necessary mitigation before warehouse occupation. These safeguards must be secured before consent is granted.

Request to Participate in Hearings

Dorchester Living requests to appear and make oral representations at **Compulsory Acquisition Hearing 2 (CAH2)** concerning the necessity, extent and nature of the compulsory acquisition powers sought over its land, including the availability of lesser interests and alternative arrangements.

Dorchester Living also requests to appear at **Issue Specific Hearing 3 (ISH3)** to make representations on the interface between OxSRFI and the existing, consented and proposed development at Heyford Park, including landscape mitigation(s), cumulative effects, infrastructure coordination, development phasing and the other mitigation and safeguards required.

1. Introduction and Context

Dorchester Living ("DL") is an Interested Party in respect of the Oxfordshire Strategic Rail Freight Interchange ("OxSRFI") Development Consent Order (Planning Inspectorate Reference TR050008). DL submitted Relevant Representation RR-037 in July 2026 following earlier representations during the non-statutory consultation in July 2022 and the statutory consultation in November 2025.

This Written Representation develops and updates the matters identified in RR-037 in light of the Applicant's subsequent responses, continuing engagement between the parties and the commencement of the Examination. It should be read alongside RR-037 rather than as a withdrawal of matters not repeated in full below.

Dorchester Living is the developer of Heyford Park at the former RAF Upper Heyford site, five miles northwest of Bicester. This representation is also made by DL on behalf of the wider Dorchester Group landowning interests.

The site has benefited from previous Local Plan allocations and planning permissions which will total approximately 2,800 dwellings, with substantial development already delivered. Within this overall quantum, planning permission 18/00825/HYBRID is presently being implemented and provides for up to 1,175 dwellings, mixed-use development and associated social and physical infrastructure, with phased delivery.

Heyford Park is an established development and community with substantial supporting infrastructure already delivered. DL's case is that it should be considered as a strategic development in its own right, rather than simply as an adjoining receptor to OxSRFI.

DL is committed to delivering the wider Heyford Park development through live hybrid application 25/02190/HYBRID for up to 9,000 additional dwellings and associated infrastructure. This is an advanced strategic application supported by a masterplan, technical assessments and continuing engagement with Cherwell District Council (CDC). The application remains undetermined, but its scale, progress and delivery commitment require substantive consideration in the OxSRFI Examination.

The wider application includes schools, community facilities and renewable energy generation, including wind, solar and battery storage. DL's objective is a landscape-led, sustainable new town with infrastructure planned alongside housing. Its relationship with OxSRFI should be assessed as the interaction of two strategic developments, including effects on the character and attractiveness of Heyford Park.

It is important to emphasise that we are a critical point in the Dorchester masterplan process (planning application 25/02190 lodged with Cherwell District Council refers). The application, including significant Technical inputs and ES/SEI work and detailed cumulative assessment, is presently being formally amended following extensive engagement with Officers and stakeholders and is the subject of statutory consultation. Our key objective is to ensure that the applications is reported to Planning Committee by the end of the year alongside a short window for completion of a S106 before determination. A Planning Performance Agreement with the Council is being concluded to this effect.

On that programme, DL expects planning permission before or shortly after the anticipated close of the OxSRFI Examination in March 2027, subject to determination and completion of the section 106 agreement. The Applicant should assess the interaction with this advancing proposal and update its evidence as the application progresses.

The enclosed letter received from MHCLG/Matthew Pennycook re the New Towns is useful and reinforces the development opportunity at Heyford Park. It is important that this dialogue continues at the Ministerial level. It states that "We believe that all locations named in the draft programme, including the proposals named above, represent credible development opportunities".

The Interim Report of the Oxford Growth Commission was published in December 2025. It aspires to transformational growth based on a well-reasoned understanding of the interaction between housing and employment.

The Report follows a January 2025 announcement by the Chancellor to form a Growth Commission for Oxford to help accelerate growth in the city, its surrounding area and the broader Oxford – Cambridge Arc. Oxfordshire has been one of the fastest growing economies in the UK, with sustained job growth of around 6,000 per year from 2010-2018.

In summary, the Report acknowledged that Planning policies need to support agglomeration and maximising economic growth and benefits by ensuring the availability and allocation of suitable land in and around the city of Oxford and in key established economic locations.

In addition, it identifies a series of practical measures to unlock existing committed development by tackling impediments to development and also emphasises collaborative multi agency working.

The Commission has identified 13 Opportunity Areas where large-scale growth could be accommodated in sustainable settlements.

Our existing and vibrant settlement at Heyford Park is identified as an Opportunity Area with an "… indicative housing potential of 9000 dwellings in addition to existing housing and with potential for more with additional land and suitable infrastructure…".

We understand that a final report is due to be published in November 2026 and reserve the right to refer to it during the remainder of this Examination.

2. Developments Since the Relevant Representation

A number of matters have moved on since RR-037 was submitted in July 2026. DL has taken those developments into account and has narrowed or refined its position where appropriate.

- The Applicant published its formal response to RR-037 in September 2026 in Applicant's Comments on Relevant Representations (Document 9.1). The Applicant rejects the suggestion that OxSRFI has been considered in isolation from Heyford Park and relies on the landscape, transport and connectivity measures incorporated into the scheme.
- The Applicant has confirmed that the six DL plots over which permanent acquisition is presently sought are 4/5, 4/5a, 4/6, 4/18, 6/10 and 6/11. It has also acknowledged that plot 4/6 was omitted from the plot-purpose table in the submitted Statement of Reasons and has said this will be corrected.
- The Applicant's revised Land and Rights Negotiation Tracker (Document 4.4, Revision 2) records extensive engagement between the parties. DL does not therefore pursue a general case that the Applicant has failed to engage or failed to seek acquisition by agreement. The remaining issue is whether the extent and nature of the interests sought are no more than reasonably necessary and whether they can be reduced or appropriately regulated through agreement.
- The Applicant provided the requested VISSIM model to DL in July 2026. DL therefore no longer maintains the criticism in RR-037 that it has been denied access to that model. The outstanding transport issue is the substantive treatment of the wider Heyford proposals and the cumulative interaction between the two schemes.
- The Network Rail Statement of Common Ground and subsequent Network Rail clarification of 11 September 2026 are now available. DL does not maintain a technical objection that the rail connection is inherently incapable of being delivered. The remaining rail issue is principally one of phasing, securing and the relationship with future passenger rail infrastructure.
- At CAH1 on 1 October 2026 the Applicant accepted that Requirement 5 permits a substantial quantum of warehouse floorspace to be occupied before the rail terminal is constructed and brought into use. The Applicant's case is that this approach is orthodox for SRFIs and reflects commercial reality. DL's remaining point is therefore whether the particular drafting and phasing proposed here adequately secure the rail-based public benefits relied upon in the compelling case.
- At CAH1 the Applicant characterised the wider Heyford proposals as aspirational because they are not presently consented or allocated, but said OxSRFI would not prejudice those proposals and may benefit them through increased highway capacity. DL addresses that position below.
- The changes identified by the Applicant at Procedural Deadline A reduce compulsory acquisition elsewhere in the Order but do not remove or alter the six Dorchester plots presently subject to permanent acquisition.
- DL has written to Mountpark raising the principal matters requiring coordination between the schemes and seeking discussions on a binding agreement supplementing any Statement of Common Ground. These matters include noise and operational controls; landscape and visual integration; construction and development phasing; future passenger rail and Ardley Station; section 106 obligations; shared infrastructure; governance and dispute resolution; and land and rights interfaces. They are addressed in the relevant sections below. DL seeks coordinated delivery of both developments while maintaining its Examination position. The proposed arrangements remain subject to agreement.

3. Summary of Principal Concerns

DL recognises the national policy objectives for rail freight. Its position on OxSRFI depends on the Applicant demonstrating that the scheme can be delivered and operated without unacceptable effects on Heyford Park, with the necessary mitigation and safeguards secured.

The Applicant has improved the interface with existing and consented development at Heyford Park. However further measures are required to adequately mitigate the impact of the scheme. Furthermore, DL's wider application has not been given sufficient weight in the design, assessment or compulsory acquisition case. The Applicant should address the current masterplan and determination programme, identify the effects on its delivery and explain how those effects will be avoided or mitigated.

The principal matters which Dorchester Living respectfully requests the Examining Authority to examine are whether:

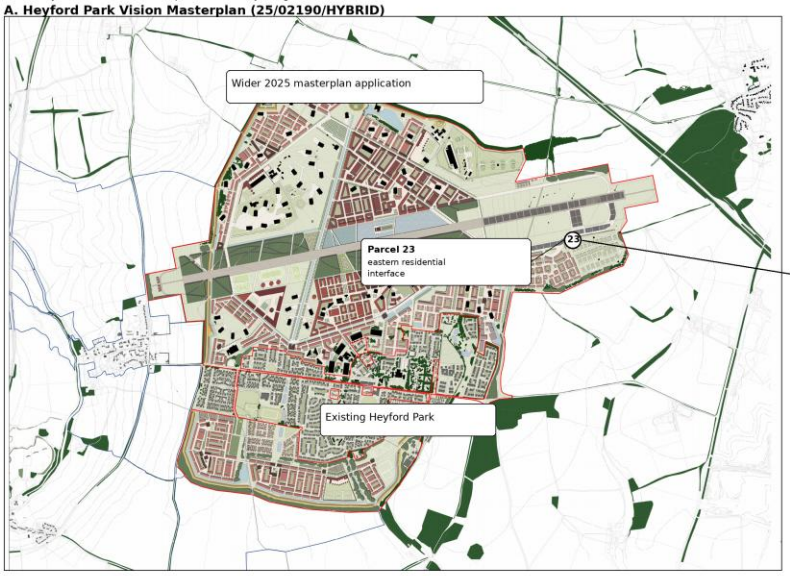
- the proposed development has been sufficiently integrated with the existing, consented and emerging strategic development of Heyford Park
- the extent and nature of compulsory acquisition from DL are no more than reasonably required
- reasonable alternatives, including lesser land interests and contractual arrangements where appropriate, have been fully explored
- the impacts on the continued delivery of Heyford Park have been properly assessed
- Requirement 5 and the wider DCO adequately secure the rail-based public benefits relied upon by the Applicant, while not prejudicing future passenger rail infrastructure
- the landscape and placemaking mitigation is adequately secured, timed and integrated with the Heyford Park interface
- the sequencing of warehouse construction, landscape mitigation and delivery of the Heyford Park Link Road adequately protects the amenity of existing and future residents, and is secured through appropriate requirements or an approved phasing plan
- the statutory tests for compulsory acquisition have been satisfied in respect of Dorchester Living's interests

Figure 1 illustrates the strategic relationship between the wider Heyford Park masterplan and the adjoining western edge of OxSRFI, including the Parcel 23 residential interface and the Heyford Park Link Road.

Figure 1 – Strategic Context: Heyford Park and OxSRFI

Wider Heyford Park Vision Masterplan and the adjoining OxSRFI western interface

A. Heyford Park Vision Masterplan (25/02190/HYBRID)



B. OxSRFI western interface



Direct strategic interface

OxSRFI Main Site / HPLR immediately adjoin the eastern edge of the Heyford Park development area.

Draft explanatory figure for the Written Representation; underlying application drawings remain the controlling plans.

Sources: Dorchester Living Illustrative Masterplan A485-PMA-XX-XX-DR-A_310011 (15 Aug 2025); OxSRFI Works Plan Sheet 4 (Doc. 2.2D).

4. Landscape and Visual Impact

RR-037 recorded DL's concern that the proposal had confined its analysis and associated mitigation principally to the consented development at Heyford Park, namely the hybrid development for up to 1,175 dwellings, mixed-use delivery and associated physical and social infrastructure (18/00825/HYBRID).

Since consultation, the Applicant has made material changes in response to the Heyford Park interface. These include reductions in the maximum height of the nearest buildings, increased landscape depths and mounding, and commitments to more mature planting from the outset. The Heyford Park Link Road is also proposed within a broad landscaped corridor. DL acknowledges that these changes are positive and capable of reducing the direct visual effects of the scheme on the closest consented development.

The Applicant has stated that it understands DL to be content with the treatment of the Heyford Park Link Road and western part of the Main Site. DL's position is more limited. The design evolution has materially improved the direct interface, but this does not amount to agreement that all landscape, placemaking, phasing and strategic development issues are resolved.

Heyford Park is being delivered as a strategic new community, with a landscape-led masterplan and renewable energy infrastructure central to DL's wider proposals. OxSRFI would fundamentally change the character of the surrounding area and the approaches to Heyford Park. Its scale, activity, noise and artificial lighting could affect residential amenity and how residents and prospective purchasers perceive the development's landscape and environmental qualities. The Applicant should assess that relationship across existing, consented and proposed development and secure appropriate mitigation, including during construction and early operation.

The effectiveness of mitigation depends on its delivery sequence as well as its specification and maintenance. DL is concerned that the proposed phasing could allow a warehouse adjoining the existing Heyford access road to be constructed before the replacement Link Road and its landscape mitigation are delivered. This could expose existing and future residents using that route to substantial visual, artificial light and noise effects during the intervening period. DL therefore seeks early delivery of bunding and planting to allow establishment, together with a secured phasing arrangement coordinating the Link Road, landscape mitigation and adjacent warehouse development.

DL's remaining landscape concerns also extend to the routes approaching Heyford Park. The experience of arrival should be considered along the motorway approach, B430, retained access road, proposed Link Road and Chilgrove Drive, including during intervening construction phases.

On the motorway approach towards Zone A3, DL seeks consideration of extending the mounding and woodland planting northwards and around the north-eastern corner, together with stronger woodland and structural planting on the lower slopes. Structural planting at the proposed roundabout should also be considered, subject to highway safety and visibility requirements.

Along the B430 on the eastern edge of Zone D, DL seeks a roadside hedgerow and stronger woodland and structural planting on the lower slopes, closer to the carriageway where practicable. These measures should address the potential for prolonged oblique views of the engineered mounding and warehouse buildings above it.

Between Zones A2 and A1, DL seeks confirmation of the mitigation available along the retained access road towards Camp Road and Heyford Park before the replacement Link Road is delivered. The construction sequence should be clarified rather than assumed. Where adjoining warehouse development precedes the replacement route, appropriate interim screening and controls on lighting and noise should be secured.

Along the north-western Link Road, DL seeks confirmation that roadside hedging will be continuous, with hedgerow trees where appropriate, protecting views from the road and adjoining diverted public rights of way and cycleway. The Applicant's corridor illustrations already depict roadside hedgerows and trees; the outstanding matters include their extent, specification and delivery. Levels and a cross-section through the road, mounding and development in western Zone A1 are required to establish whether any raised road alignment reduces the screening available.

At the approach to Zone A4a, DL seeks consideration of a group of native trees of an enhanced specification to provide a landscape focal point on the approach to the right-hand turn into the estate. Along Chilgrove Drive, DL seeks consideration of extending woodland and structural planting closer to the road and strengthening planting on the lower slopes to improve screening and the sense of arrival at Heyford Park.

Section F illustrates the relationship between Chilgrove Drive, the mitigation mounding and Zone A4c, including the revised arrangement. Further sections are sought for the relationship with Zone A4a and where necessary to clarify road levels and screening. The illustrative planting shown should be supported by a detailed specification identifying species, sizes at planting, densities, establishment and replacement arrangements.

DL also requires the drainage design to address surface water runoff from the screening mounds towards Heyford Park. There are well-publicised examples of reported flooding of neighbouring gardens from earth mounds around logistics warehouse development, including at Astley Business Park in Wigan (ITV News, 11 December 2025). Although the OxSRFI development plateau is lower than the adjoining Heyford Park land, DL is concerned that the substantially larger proposed mounds create a runoff risk from the significant slope facing DL's retained land. DL has not identified how this runoff would be intercepted and managed. Appropriate drainage should be incorporated along the proposed bridleway, with its delivery and future maintenance secured, to avoid constraining development at Heyford Park or causing lasting drainage problems.

DL seeks a clear programme relating to strategic mounding, planting and the Link Road to each adjoining development zone, with early delivery of mitigation to allow establishment and protection of the retained approach until the replacement route and its mitigation are available. The illustrations do not establish the screening available before planting matures or during construction. DL intends to discuss these matters with the Applicant and reserves the right to amplify them with further plans and visual material during the Examination.

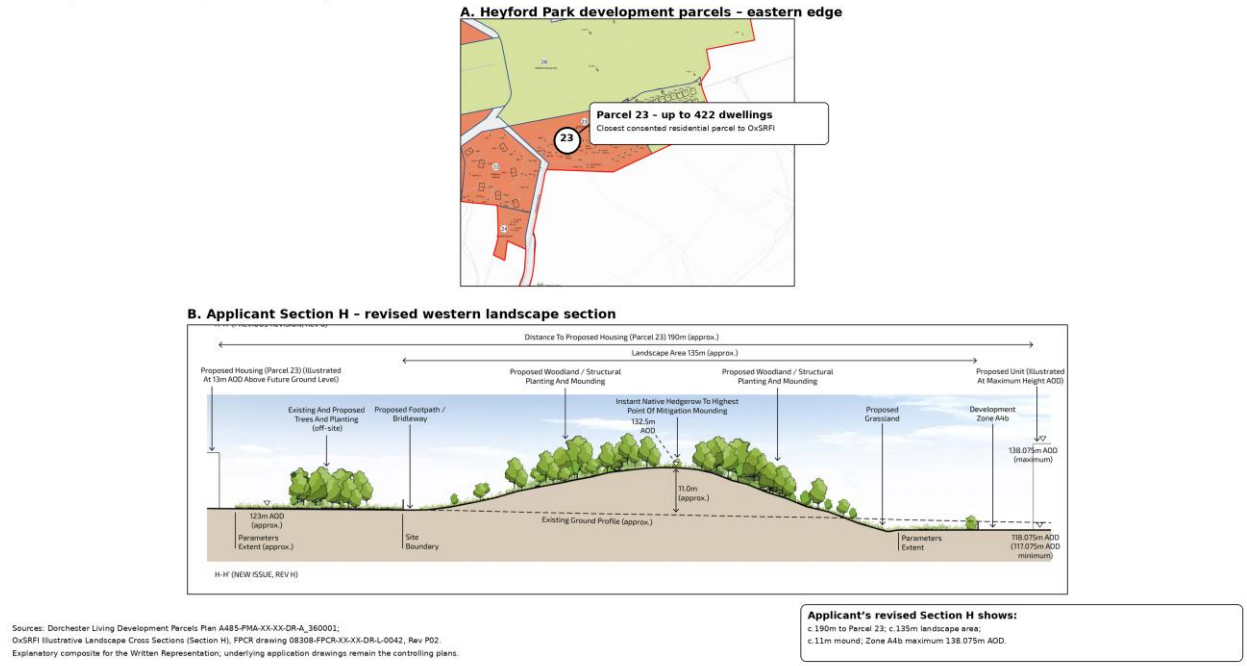
The proposed agreement would address the delivery, maintenance and future management of landscape mitigation at the interface. DL seeks to establish how those arrangements would complement the DCO controls and secure the coordinated implementation of the mitigation relied upon.

DL requires a coordinated landscape, lighting, noise and drainage response supported by drawings, specifications and a delivery programme. The Applicant should identify the DCO requirements and other binding commitments securing each measure, including establishment, maintenance, monitoring and remedial action. The response should address the wider Heyford masterplan alongside existing and consented development, with their planning status clearly identified.

Figure 2 illustrates the closest consented residential interface at Parcel 23 and the Applicant's revised Section H landscape treatment between Parcel 23 and Zone A4b.

Figure 2 – Parcel 23 / Western Landscape Interface

Relationship between the eastern Heyford Park residential edge and OxSRFI Zone A4b



Sources: Dorchester Living Development Parcels Plan A485-PMA-XX-XX-DR-A_360001; OxSRFI Illustrative Landscape Cross Sections (Section H), FPCR drawing 08308-FPCR-XX-XX-DR-L-0042, Rev P02. Explanatory composite for the Written Representation; underlying application drawings remain the controlling plans.

Applicant's revised Section H shows:
c.190m to Parcel 23; c.135m landscape area; c.11m mound; Zone A4b maximum 138.075m AOD.

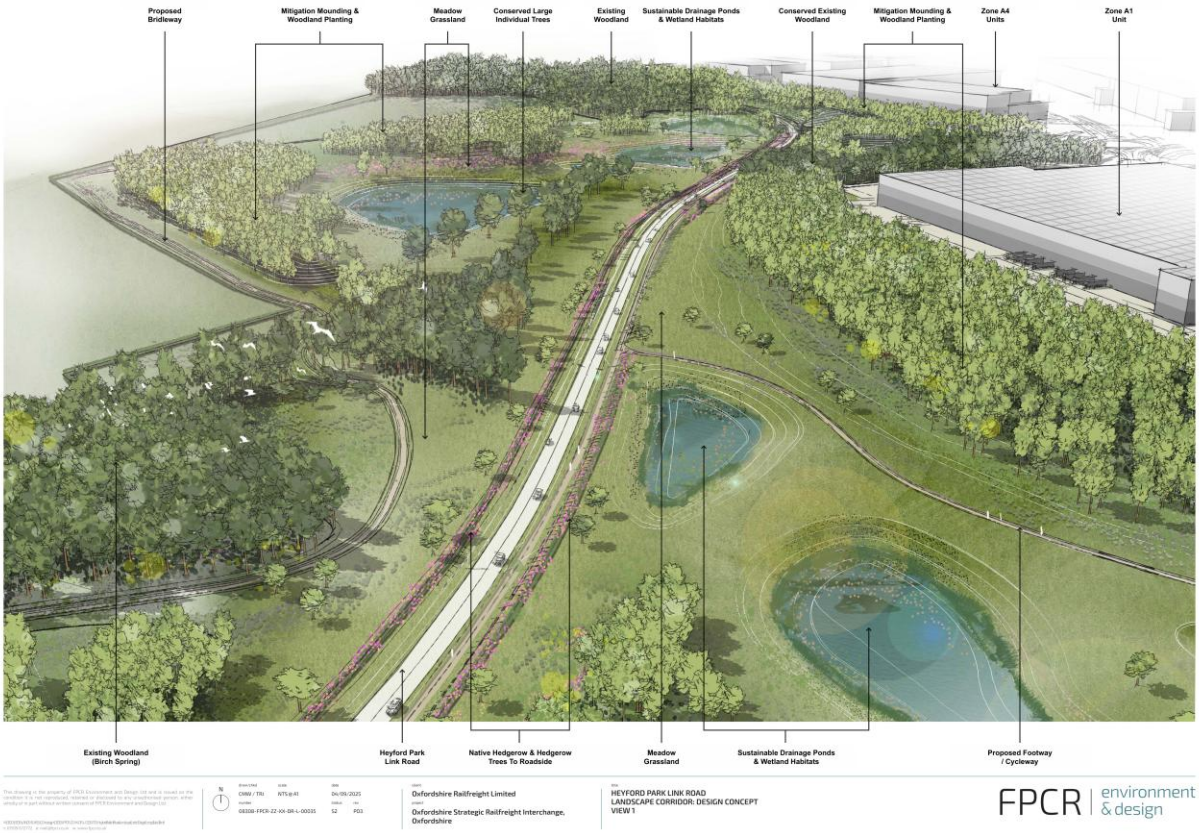


Figure 2a. Applicant's illustrative Link Road landscape corridor, View 1. Source: FPCR drawing 0035, revision P03, 4 September 2025. The view depicts roadside hedging and trees, walking and cycling routes and mitigation adjoining Zones A1 and A4. It does not establish the timing of delivery or screening during early phases.

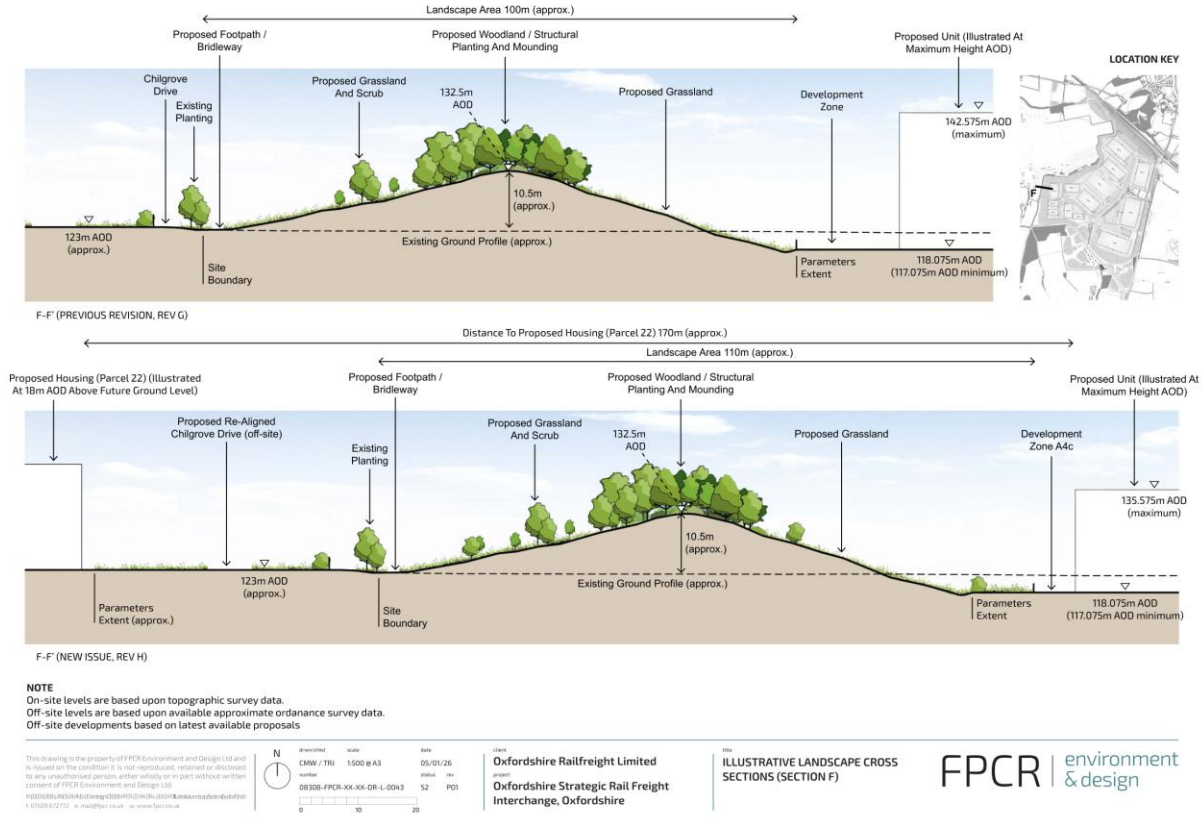


Figure 2b. Applicant's illustrative landscape Section F. Source: FPCR drawing 0043, revision P01, 5 January 2026. The upper section shows the previous arrangement and the lower section the revised Chilgrove Drive and Zone A4c relationship. Further sections are sought for Zone A4a and the western Zone A1 Link Road interface.

5. Transportation - Passenger Rail

RR-037 identified two broad rail issues: the interaction between passenger and freight services on the Chiltern Main Line, including the future aspiration for an Ardley passenger station, and the phasing of warehouse occupation relative to delivery of the rail freight terminal.

The evidential position has moved on. The Network Rail Statement of Common Ground is now available and Network Rail's further clarification dated 11 September 2026 addresses W8 loading gauge, routing and the four core return train paths. DL does not therefore maintain a technical objection that the proposed freight connection is inherently incapable of being delivered.

Network Rail's clarification is, however, deliberately qualified. It states that the developing Chiltern Line Strategic Advice is intended to advise funders and stakeholders on future opportunities rather than to provide a definitive statement on current or future network capacity and capability. DL therefore considers that the longer-term interaction between freight growth, passenger services and any future station remains a matter that should be kept under review during the Examination.

The practical and policy case for a future passenger station at Ardley also remains relevant. OxRAIL 2040 identifies the exploration of a station to serve Heyford Park, other development and the proposed SRFI. The Applicant's position is that OxSRFI would not prejudice a future station and may assist through signalling and other rail infrastructure. DL welcomes that position, but considers that the Examination should be satisfied that the detailed design and future rail arrangements do not unnecessarily constrain that opportunity.

A passenger station could also benefit OxSRFI employees and employers by providing an alternative public transport connection to the employment site. Safeguarding that opportunity therefore has potential benefits for both developments.

DL also seeks discussion of opportunities to coordinate bus services serving Heyford Park and OxSRFI for the benefit of both developments. Any service arrangements and allocation of costs would require separate agreement.

DL has raised with Mountpark the need for collaboration on Ardley Station and its connections. DL requires the Applicant to demonstrate that the OxSRFI layout, land arrangements and construction programme safeguard a practicable station connection. The station remains a future proposal, but the route through OxSRFI should be planned and protected now.

The Applicant has not adequately demonstrated how people would travel from Heyford Park through OxSRFI to a future Ardley Station. DL requires an enhanced footpath/bridleway connection through the development towards the station, with a safeguarded onward connection to the station site. The route should be direct, accessible and attractive, with appropriate width, surfacing, drainage, landscape screening and safe crossings of roads and operational accesses. The Applicant should agree the alignment and specification with DL and the relevant authorities, protect it during construction and secure delivery, public access and maintenance. Its design should address noise and lighting so that passage through the freight development does not undermine the route's practical use.

Given the proximity of the proposed development to the potential station platforms, the Applicant should demonstrate that its layout would not prejudice practicable vehicular access to a future Ardley Station. This should include consideration of whether land affected by OxSRFI provides the logical access route and, if so, how that route would be safeguarded or a suitable alternative retained. The response should explain how access within the Order limits would connect with any necessary access outside them, including for buses, drop-off, servicing and emergency vehicles.

The remaining Requirement 5 issue is narrower than set out in RR-037. The Applicant has clarified that the definition of the terminal being "available for use" includes connections to the Chiltern Main Line. DL therefore does not maintain the suggestion that a terminal could satisfy the requirement while physically disconnected from the main line.

However, the Applicant accepted at CAH1 that Requirement 5 permits up to 232,258 square metres (approximately 2.5 million sq ft) of warehouse floorspace to be occupied before the rail terminal is constructed and brought into use. This represents approximately 38% of the maximum 6.5 million sq ft of warehouse floorspace. The Applicant relies on precedent from other SRFIs and says this phasing is orthodox and commercially necessary.

The Applicant relies on rail-based public benefits to justify the DCO and compulsory acquisition. It should demonstrate why the amount and duration of warehouse occupation permitted before the terminal opens are necessary and how Requirement 5 secures timely rail operation. Any further occupation limits or delivery triggers needed to secure those benefits should be incorporated into the DCO.

DL therefore asks the Examining Authority to consider whether Requirement 5 appropriately controls the amount and duration of warehouse occupation before the rail terminal is constructed and brought into use; whether the rail connection and operational arrangements are adequately secured; and whether the proposals continue to safeguard and, where reasonably practicable, facilitate future passenger rail infrastructure at Ardley. The longer-term interaction between freight growth and passenger services should also be considered in light of the qualified nature of Network Rail's strategic capacity advice.

6. Impact on the Delivery of Heyford Park

The submitted application has not, in DL's view, fully assessed the consequences of the proposed development on the continued long-term delivery of Heyford Park as one of Oxfordshire's significant growth locations.

The Applicant's position has now been clarified. It says that existing and consented development at Heyford Park has been taken into account, whereas the wider 9,000-dwelling proposal is an aspiration because it does not presently benefit from planning permission or a supporting allocation. The Applicant also says that OxSRFI will not prejudice that wider proposal and that the highway works may in fact benefit it.

DL's wider application remains undetermined, but is supported by substantial technical work and an active determination programme. The Applicant should assess the interaction with that masterplan through reasonable development scenarios, identify constraints on its delivery and specify the design changes or safeguards required. Its present planning status does not justify deferring that work.

The interaction between the two schemes extends beyond landscape and visual matters. It includes transport infrastructure, passenger rail connectivity, utilities, landscape structure, placemaking, employment opportunities, access arrangements and the long-term delivery of sustainable growth within this part of Oxfordshire.

DL has raised construction and development phasing with Mountpark as a specific matter for agreement. DL seeks arrangements to coordinate timing and sequencing so as to avoid unnecessary disruption, sterilisation of development land, duplicated infrastructure or delay to either scheme. The Examination should establish whether any necessary safeguards require DCO controls, binding contractual arrangements or both.

DL is concerned that delivery of the Ardley bypass and Heyford Park Link Road could constrain construction access to Heyford Park during overlapping build-out periods. The Applicant should demonstrate, through a phased access plan, how suitable construction and operational access to the existing and consented development would be maintained throughout the works, with provision for the wider development should permission be granted. The assessment should identify any temporary restrictions, alternative routes and their capacity and suitability for construction HGVs, including any routing restrictions at Middleton Stoney. Necessary replacement access should be available before existing access is interrupted, with the sequence and responsibilities secured.

The Applicant's proposition that its highway works will provide capacity beneficial to the wider Heyford proposals is itself an illustration of the strategic interrelationship between the schemes. Any such benefit should be demonstrated rather than assumed, and considered alongside the extent to which OxSRFI itself consumes capacity or alters the infrastructure strategy for the wider area.

DL also proposes a review of the interaction with existing section 106 obligations, including any amendments or replacement obligations required and the allocation of associated costs. The outcome remains to be established: the proposal to review those obligations does not establish that existing liabilities will be extinguished or that any alleged infrastructure cost savings are agreed.

DL's concern includes the effect of acquisition on land required to deliver infrastructure under the existing permission and associated section 106 obligations. The affected commitments, any necessary amendments and replacement delivery arrangements should be identified and resolved with OCC and CDC.

The Applicant should provide a schedule of affected Heyford infrastructure and planning obligations, showing the land required, delivery triggers, any interruption caused by OxSRFI and the replacement arrangements.

Necessary amendments should be agreed with OCC and CDC and funded by the Applicant before the relevant acquisition or works prevent DL from meeting its existing commitments.

Similarly, the Applicant's reliance at CAH1 on the small absolute extent of DL land proposed for acquisition does not, of itself, answer whether those interests are necessary or whether their acquisition affects the coordinated delivery of Heyford Park. The function and location of the interests, and the form of interest taken, are relevant to that assessment.

DL requires the Applicant to demonstrate how construction and operational noise and artificial light will be controlled at existing and future Heyford Park receptors and along the principal approaches. Particular attention is required to night-time effects associated with 24-hour operation, including HGV and forklift movements, loading and unloading, reversing alarms and other audible vehicle warnings, plant and yard lighting, and their potential to disturb sleep and affect residential amenity. The assessment should address the wider masterplan and the combined effects of these activities, including during intervening phases before permanent mitigation is effective. The Applicant should identify applicable limits, operating controls, lighting specifications, delivery triggers, monitoring and procedures for remedial action, with the necessary measures secured before the relevant operations commence.

DL therefore asks the Examining Authority to consider the interaction between OxSRFI and Heyford Park across the existing, consented and emerging development, while giving appropriate weight to their different planning status. In particular, the claimed infrastructure benefits to Heyford Park should be evidenced and balanced against any constraints or effects introduced by OxSRFI, and consideration should be given to whether further design or agreement measures are required to protect the continued comprehensive delivery of Heyford Park.

7. Consideration of Alternatives and Scheme Evolution

Throughout the pre-application process Dorchester Living has sought to engage constructively with the Applicant with a view to improving the integration between the proposed Strategic Rail Freight Interchange and the future development of Heyford Park. That engagement has included representations during consultation together with technical input on landscape, transport and rail matters.

DL acknowledges that the scheme has evolved materially in response to that process, particularly at the western interface and in the landscape treatment closest to Heyford Park. The Written Representation therefore does not maintain the broader proposition in RR-037 that the principal concerns have had little influence on the final design.

The remaining question is whether the design and land strategy have evolved as far as is reasonably practicable, having regard to the statutory requirement that compulsory acquisition should be no more extensive than necessary. In particular, the Examination should distinguish between the need for the relevant works and the need for the particular land interest sought to deliver them.

The Applicant itself provided a relevant example at CAH1. In relation to land required for ecological mitigation, it explained that it had responded to the landowner's concerns by moving away from proposed acquisition of the landowner's freehold and instead agreeing a lease, while retaining only those compulsory powers said to be necessary to clear third-party interests. DL does not suggest that the same solution must apply to its land. The example does, however, demonstrate the principle that the form of land interest should be tailored to what is genuinely required.

DL therefore considers that the same discipline should be applied to its six plots. Where the Applicant's operational objectives can be achieved through a lesser interest, a land and works agreement, highway arrangements, rights or other contractual protections, those alternatives should be considered before outright freehold acquisition is authorised.

8. Compulsory Acquisition

The Applicant must satisfy the statutory tests necessary to justify the compulsory acquisition of land and rights. At CAH1 the Examining Authority emphasised that the Applicant must demonstrate, among other matters, that the land is required for the authorised development or to facilitate or be incidental to it, that there is a compelling case in the public interest, that the land sought is no more than reasonably required, that reasonable alternatives have been explored and that the interference with affected interests is necessary and proportionate.

The Applicant says that the strategic need for the SRFI, the public benefits of rail freight and its land assembly strategy establish a robust compelling case. It also relies on the high proportion of land already under its control or subject to agreed terms and the relatively small number of outstanding compulsory acquisition objections.

DL does not dispute the national policy support for SRFIs or the fact that extensive negotiations have taken place. Those matters do not, however, remove the requirement to justify the acquisition of the six DL plots and the nature of the interest sought in each case. The compulsory acquisition case must still be demonstrated by reference to the statutory tests.

The compulsory acquisition case should also address any interference with delivery of infrastructure required under the existing Heyford Park permission and section 106 agreement. Where acquisition necessitates amendments or replacement arrangements, DL seeks their agreement with OCC and CDC, together with appropriate provision for the resulting costs, before the affected land is taken.

8.1. Compelling Case in the Public Interest

DL accepts the national policy support for Strategic Rail Freight Interchanges and the public benefits associated with transferring freight from road to rail. Its objection is not directed to the national need for SRFIs in principle.

That policy support does not remove the Applicant's obligation to justify why each parcel and each interest proposed to be acquired compulsorily is necessary for this development and why the interference is proportionate.

The Applicant's response at CAH1 was that the area sought from DL is extremely small and will not frustrate either the consented or wider proposed development at Heyford Park. DL considers that absolute area is not the statutory test. The significance of the interest depends on its location, function and relationship with the wider development and infrastructure strategy, as well as the nature of the interest being acquired.

The compelling case should also be assessed in the context of the Applicant's reliance on rail-based public benefits. As set out in section 5 above, the Applicant accepts substantial warehouse occupation can occur before the rail terminal is brought into use. DL therefore considers that the Examination should be satisfied that those public benefits are adequately secured by the DCO when weighing them against the interference caused by compulsory acquisition.

DL therefore submits that the compelling-case assessment should address each of its affected interests, the extent to which the public benefits relied upon are adequately secured by the DCO and associated arrangements, and the weight given to the strategic interaction with Heyford Park while recognising the different planning status of the wider proposal.

8.2. Reasonable Alternatives

The Applicant's Statement of Reasons concludes that reasonable alternatives have been considered and that the land and rights sought are necessary. DL does not suggest that the Applicant was required to identify an alternative site for the SRFI. The relevant question is whether alternative design, engineering and land-interest solutions could reduce the degree of interference at this location.

DL acknowledges the design changes made at the western interface and the Applicant's continuing willingness to negotiate. The remaining issue is whether that approach has been carried through to the nature and extent of the compulsory interests sought over DL land.

The Applicant's CAH1 example of using a voluntary lease for ecological mitigation rather than acquiring the landowner's freehold is relevant in principle. It demonstrates that the Applicant is capable of distinguishing between the land required for a purpose and the proprietary interest necessary to secure that purpose. DL considers that the same question should be asked in relation to its plots.

DL therefore considers that reasonable alternatives to outright freehold acquisition should be tested for each affected plot, including whether lesser interests or contractual arrangements would provide sufficient certainty and whether further refinement through the Land and Works Agreement can reduce the compulsory powers ultimately required.

8.3. Land No More Than Reasonably Required

The Applicant has now provided greater clarity than was available when RR-037 was prepared. It identifies six DL plots subject to permanent acquisition: 4/5, 4/5a, 4/6, 4/18, 6/10 and 6/11. It has stated that 4/5 and 4/6 are the most significant and that the principal requirement relates to Upper Heyford Road and the adjoining strip

being replaced by the Heyford Park Link Road. The Applicant has also acknowledged that plot 4/6 was omitted from the plot-purpose table in Appendix 1 of the submitted Statement of Reasons and has undertaken to correct that omission.

DL welcomes that clarification. Detailed plot-specific matters can be addressed further through the continuing negotiations and CAH2. At this stage, however, DL maintains that the Applicant should demonstrate not only that works are proposed on or affecting each plot, but why the whole of the permanent freehold interest sought is necessary and why a lesser interest could not provide adequate delivery certainty.

This is particularly important where the affected land forms part of the access, highway, landscape or infrastructure framework serving Heyford Park. In that context, the impact of the interest acquired cannot be judged solely by reference to its area.

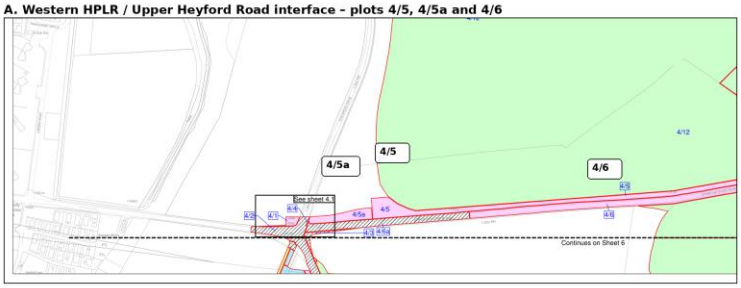
DL therefore asks the Examining Authority to be satisfied that each parcel and the nature of the interest sought are no more than reasonably required; that permanent freehold acquisition has been minimised wherever reasonably practicable; and that lesser rights, highway arrangements or contractual controls could not achieve the same operational objectives. The corrected Statement of Reasons should also provide a clear and complete justification for plot 4/6 and the other DL interests.

Figure 3 identifies the six Dorchester plots presently relied upon in the compulsory acquisition case and illustrates why the necessity and nature of the interest sought should be tested on a plot-specific basis.

Figure 3 – Dorchester Land Interests Affected by the Order

Applicant Land Plan extracts identifying the six Dorchester plots referred to in the Written Representation

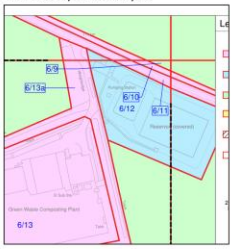
A. Western HPLR / Upper Heyford Road interface – plots 4/5, 4/5a and 4/6



B. Plot 4/18



C. Plots 6/10 and 6/11



Plot group	WR relevance
4/5, 4/5a, 4/6	Western interface / Upper Heyford Road and HPLR.
4/18	Separate affected parcel within the Main Site land plan.
6/10, 6/11	Further Dorchester interests shown on Land Plan Sheet 6.

Sources: OxSRFI Land Plan Sheet 4 (Document 2.1D) and Land Plan Sheet 6 (Document 2.1F). Applicant symbology retained.
Explanatory composite only; the Book of Reference and certified Land Plans remain the controlling documents.

8.4. Acquisition by Agreement

DL's position on acquisition by agreement has narrowed materially since RR-037. The revised Land and Rights Negotiation Tracker records sustained engagement between the parties from 2020 onwards, including discussions on land acquisition, highways, landscape, public transport and sustainable travel opportunities. It also records that DL wished to progress transport and landscape matters before land negotiations were taken further, and that land-agent discussions resumed in July 2026.

DL therefore does not contend that the absence of agreement to date demonstrates a failure by the Applicant to engage, nor should it be characterised as a failure by either party to participate constructively. A substantial part of the dialogue has necessarily concerned the wider interface between the schemes because those matters inform the extent and nature of the interests ultimately required.

DL remains willing to conclude a voluntary Land and Works Agreement. DL has also written to Mountpark seeking a binding agreement covering the wider design, delivery and operational interface between the schemes, supplementing any Statement of Common Ground. Its relationship with the Land and Works Agreement, the parties to be bound and the obligations to be secured remain matters for negotiation. A record of common ground should distinguish agreed matters from proposed measures that have not yet been secured.

DL proposes topic-specific meetings leading to Heads of Terms, with nominated representatives, regular liaison and escalation and dispute-resolution procedures. DL seeks progress during the Examination so that the Examining Authority can assess which matters have been resolved and what controls or commitments remain necessary before the Examination closes.

8.5. Necessity and Proportionality

The Applicant concludes that the compulsory acquisition powers sought are necessary, proportionate and compatible with the Human Rights Act 1998. DL accepts that the national policy case for SRFIs carries substantial public weight. The issue is whether the particular interference with DL's interests is necessary and proportionate to secure those benefits.

The Applicant's reliance on the relatively small amount of DL land required is relevant but not determinative. Proportionality requires consideration of the nature and function of the land and interest taken, the availability of lesser alternatives, the effect on the existing and consented Heyford development and the strategic interaction with the wider live proposals.

DL therefore submits that the Examining Authority should consider whether the compulsory acquisition powers sought from DL are necessary and proportionate having regard to the nature and function of the interests, not merely their area; whether the Applicant's objectives could reasonably be achieved through a less intrusive proprietary or contractual solution; and whether an appropriate balance has been struck between the public benefits of OxSRFI and the continued comprehensive delivery of Heyford Park.

9. Heyford - Utility Infrastructure

RR-037 explained that Dorchester Living has been in dialogue with the energy-from-waste facility at Ardley regarding the potential provision of a private wire connection to Heyford Park. Such a connection could provide a significant electricity supply to support continued development.

The Applicant's September response states that the RR was the first time this potential connection had been brought to its attention, that it sees no reason why an appropriate route cannot be found and that it is willing to discuss the matter further. DL welcomes that response.

DL requires an agreed plan safeguarding a practicable route for the proposed private wire connection, with any necessary crossings, access and protection arrangements identified before the OxSRFI layout or works prevent its delivery. The Applicant should identify how these arrangements will be secured through the DCO or a binding agreement.

The proposed wider agreement also covers technical coordination of utilities, drainage and shared infrastructure. DL seeks to identify the relevant routes and interfaces, avoid duplicated provision and secure practical arrangements where required to protect future delivery.

10. Transport Modelling

RR-037 raised concern that DL did not have access to the Applicant's VISSIM mitigation model and that this prevented proper testing of cumulative impacts with the wider Heyford proposals. That position has moved on: the Applicant released the VISSIM model to DL in July 2026, and DL no longer maintains the disclosure point in its previous form.

The substantive cumulative issue remains. The Applicant relies on transport assumptions agreed through the Transport Working Group, but DL understands that the interaction with the full 9,000-dwelling Heyford masterplan has not been adequately tested. The Applicant should identify precisely which Heyford development and phasing assumptions its modelling includes.

DL requires the Applicant to test reasonable future scenarios incorporating the wider Heyford masterplan, identify capacity constraints and set out the mitigation and delivery responsibilities. That work should distinguish existing commitments from the live application and show how OxSRFI traffic uses any capacity claimed as a benefit to Heyford Park. DL's own modelling work does not remove the need for the Applicant to demonstrate this.

DL's transport work is continuing using the modelling information now provided, including testing Heyford Park and the Applicant's scheme together. DL reserves the right to supplement this Written Representation when that work is sufficiently advanced and to respond to any further transport evidence submitted during the Examination.

11. Conclusion

DL requires the following matters to be addressed during the Examination and secured through the DCO and binding agreements as appropriate:

- Assessment of the wider 9,000-dwelling Heyford Park masterplan and delivery programme during the Examination, alongside existing and consented development and with their different planning status identified. The Applicant must identify effects on delivery, demonstrate any claimed infrastructure benefits and provide the design changes and safeguards required.
- A coordinated landscape scheme for the western interface and approaches to Heyford Park, including Parcel 23, the retained access road, the Link Road and Chilgrove Drive. Drawings, sections and planting specifications must demonstrate the screening available during construction, early operation and after establishment, with maintenance and replacement secured.
- Binding phasing controls coordinating warehouse development, strategic mounding, planting and the Heyford Park Link Road. Bunding and planting must be delivered early to allow establishment, with necessary mitigation in place before warehouse occupation and interim screening, noise and lighting controls protecting residents until permanent measures are effective.
- Enforceable noise and lighting controls protecting existing and future Heyford Park residents and its principal approaches. These must address the combined night-time effects of 24-hour operation, including HGV and forklift movements, loading and unloading, reversing alarms, plant and yard lighting, with applicable limits, monitoring and remedial action secured before the relevant operations commence.
- A drainage design demonstrating how runoff from screening mounds will be intercepted and managed, including along the proposed bridleway, with delivery and long-term maintenance secured to protect Heyford Park and avoid constraining its development.
- Safeguarding of future Ardley Station and practicable connections to it. An enhanced, direct and accessible footpath/bridleway through OxSRFI must have an agreed alignment and specification, safe crossings, construction protection, delivery, public access and maintenance arrangements. The Applicant must also demonstrate that practicable vehicular access to the station is not prejudiced.
- Justification of the amount and duration of warehouse occupation permitted before the rail freight terminal opens. Requirement 5 must secure timely rail operation, with any necessary additional occupation limits and delivery triggers incorporated into the DCO so that the rail-based public benefits relied upon are secured.

- Cumulative transport testing incorporating reasonable scenarios for the wider Heyford Park masterplan, identifying capacity constraints, mitigation and delivery responsibilities. A phased access plan must maintain suitable construction and operational access throughout the works, with necessary replacement access available before existing access is interrupted.
- Safeguarding of a practicable private wire route from the Ardley energy-from-waste facility, including necessary crossings, access and protection arrangements, before the OxSRFI layout or works prevent delivery. Utilities, drainage and shared infrastructure must be coordinated between the schemes.
- Plot-specific justification of the extent and nature of the interests sought over each of DL's six plots. The Applicant must demonstrate why permanent freehold acquisition is necessary and why lesser interests, highway arrangements or contractual protections would not achieve its objectives. Compulsory powers must be reduced wherever those alternatives provide adequate certainty.
- A schedule identifying affected Heyford Park infrastructure and section 106 commitments, together with replacement delivery arrangements and necessary amendments agreed with OCC and CDC. The Applicant must meet the associated costs and secure those arrangements before acquisition or works prevent DL from fulfilling its existing commitments.
- DCO Requirements and a binding legal agreement securing the necessary safeguards before consent is granted. The agreement must address interface works, construction and operational controls, delivery triggers, funding and responsibilities, maintenance, monitoring, remedial action, liaison and dispute resolution. Continuing negotiations or a Statement of Common Ground alone are insufficient to secure these outcomes.

DL remains committed to constructive engagement and reserves the right to supplement these representations as further evidence becomes available, including on the detailed compulsory acquisition issues at CAH2.

Appendix 1 MHCLG correspondence dated 6 August 2026

Ministry of Housing, Communities & Local Government

Matthew Pennycook MP
Minister of State for Housing and Planning
2 Marsham Street
London
SW1P 4DF

Our reference: [redacted]

[redacted] Director, Belport
on behalf of the Adlington New Town team

[redacted]Managing Director, Be First
on behalf of South Barking

[redacted] Development Director
on behalf of Dorchester Living

[redacted] Director of Place, East Devon District Council, on behalf of the Marlcombe team

Via email:
[redacted]cavendishconsulting.com

6 August 2026

Dear all,

Thank you for your letter of 8 July regarding strengthening the pipeline of New Towns.

I appreciate how important this matter is and I am grateful to you for taking the time to write. I have asked my officials to address your concerns in the letter appended.

Please be assured that I am conscious of the matters you have raised, and I appreciate the insight your correspondence provides.

I hope the attached response suitably addresses your enquiry. If that is not the case, please don't hesitate to let me know.

Best wishes,

[redacted]

RT HON MATTHEW PENNYCOOK MP
Minister of State for Housing and Planning

Ministry of Housing, Communities & Local Government

Ministry of Housing, Communities and Local Government
2 Marsham Street
London
SW1P 4DF

Our reference: [redacted]

[redacted], Director, Belport
on behalf of the Adlington New Town team

[redacted] Managing Director, Be First
on behalf of South Barking

[redacted] Development Director
on behalf of Dorchester Living

[redacted] Director of Place, East Devon District Council, on behalf of the Marlcombe team

Via email:
dominic.mayall@cavendishconsulting.com

6 August 2026

Dear all,

Thank you for your letter of 8 July 2026 and for your continued engagement with the Government on the proposals at Adlington, South Barking, Heyford Park and Marlcombe (East Devon), to which the Housing Minister has asked me to reply. I can provide the following information, which I hope will be helpful.

As you will be aware, in spring the Government consulted on the Draft New Towns Programme. That consultation set out the Government's intention to take forward seven new towns and invited views on the proposed programme and its environmental implications. The consultation closed on 19 May and we are currently analysing the feedback received. We will publish our response in due course. Further information about the consultation can be found here: https://www.gov.uk/government/consultations/new-towns-draft-programme/annex-c-locations-methodology-new-towns-draft-programme.

We have noted your suggestion to establish a formal "Associate New Towns" pathway and I have passed this to the relevant policy officials for their consideration. The Government recognises the strength of propositions across the board, including those identified as reasonable alternatives to the programme. We believe that all locations named in the draft programme, including the proposals named above, represent credible development opportunities. Insofar as possible, the Government is supportive of housing delivery at these sites coming forward through our established programmes and interventions.

This means no final decisions have been taken on new town locations, where the Department has been clear that these will be taken once environmental assessments are complete. Those final decisions will be made in the national interest.

Thank you for taking the time to write on this important matter.

Yours sincerely,

[redacted]

Deputy Principal Private Secretary