Response to: "Approach to Design including Quantum of Development" (Ref: REP1-017)[i]

This response will focus on sections 4 and 5 of the referenced document, "Comparison with other SRFI's in the UK", in which - as justification for the extraordinary size of warehousing proposed - the Applicant has provided data and layouts of three other SRFIs (East Midlands Gateway, West Midlands Interchange, and Northampton Gateway) and additional commentary on its previously submitted Design Approach Document.

The OxSRFI proposal seeks over 70% more warehouse space per train than East Midlands Gateway SRFI and Northampton Gateway SRFIs

A direct comparison of the data presented by the applicant highlights the mismatch between OxSRFI maximum train capacity and warehousing, compared to two of the Applicant's chosen benchmark sites:

	OxSRFI (Proposed)	**East Midlands Gateway**	**Northampton Gateway**
Applicant's own data:			
Capacity - Number of trains processed per day	12	16	16
Amount of warehousing (footprint only)	603,850 m^2	418,099 m^2 as built	468,000 m^2
Calculations, based on the Applicant's data:			
"Gross Warehousing efficiency" (Footprint / daily train capacity)	50,320 m^2 / daily train	26,131 m^2 / daily train	29,250 m^2 / daily train
Requirement for floorspace per maximum daily trains (relative to OxSRFI)	100% (reference)	52% of OxSRFI warehouse space	58% of OxSRFI warehouse space
Oversizing of OxSRFI, relative to each benchmark		OxSRFI is 1.92 times oversized	OxSRFI is 1.72 times oversized
Warehousing required at OxSRFI if applying same "Gross Warehousing Efficiency		**OxSRFI would be only 314,000 m^2**	**OxSRFI would be only 351,000 m^2**
Excess of OxSRFI warehousing, relative to benchmark		OxSRFI is 290,000 m^2 oversized when compared to this benchmark	OxSRFI is 253,000 m^2 oversized when compared to this benchmark

Table 1: Calculations based on Applicant-provided size benchmarking data for other SRFIs

In other words, at two of the Applicant's preferred benchmarking SRFIs, the comparison suggests that OxSRFI could fulfil its essential rail freight function with between 314,000 and 351,000 m2 of warehousing space.

A key SRFI precedent has been omitted from the Applicant's benchmarking

One might also have chosen to compare the proposed 603.850 m^2 of the OxSRFI to Radlett SRFI (331,655 m^2 consented for 12 daily train capacity[1]), which will serve the London area.

The Radlett SRFI was also found to be capable of fulfilling its essential rail freight function while having considerably less on-site warehousing space than what has been proposed for OxSRFI:

	Proposed OxSRFI	**Radlett SRFI**
Capacity - Number of trains processed per day	12	12
Amount of warehousing (footprint only)	603,850 m^2	331,665 m^2
"Gross Warehousing efficiency" (Footprint / daily train capacity)	50,320 m^2 / daily train	27,639 m^2 / daily train
Requirement for floorspace per maximum daily trains (relative to OxSRFI)	100% (reference)	55% of OxSRFI warehouse space
Oversizing of OxSRFI, relative to each benchmark		OxSRFI is 1.82 times oversized
Warehousing required at OxSRFI if applying same "Gross Warehousing Efficiency		**OxSRFI would be only 332,000 m^2**
Excess of OxSRFI warehousing, relative to benchmark		OxSRFI is 272,000 m^2 oversized when compared to this benchmark

The conclusion that a warehouse site of around 300,000-350,000 m^2 would more reasonably reflect rail freight requirements is further reinforced by the Applicant's Rail Report[2] which shows that SRFIs proposed between 2001 and 2010 were found able to serve their rail freight function while having an average of 3.3 million sq ft, or **307,000 m^2**, of warehouse space. In this context, the proposed 603,850 m^2 warehouse site at OxSRFI is clearly excessive.

[1] https://assets.publishing.service.gov.uk/media/5a7edcbae5274a2e87db2608/14-07-14_DL_IR_SRFI_Radlett_REDET_2109433.pdf

[2] Reference: APP-312

The Applicant's rail report confirms that market demand for warehousing is the driver of increasing SRFI size

> 4.1.12 SRFI projects have grown in scale since the arrival of the "freight village" concept in the approach to opening of the Channel Tunnel during the late 1980s and early 1990s, as shown in Table 3 below. This reflects the latent scale of demand for high-quality, rail-served floorspace in strategic locations as provided by SRFI. The total consented floorspace across all SRFI built or under construction totals around 72 million square feet, but this only represents around 10% of total warehousing floorspace in Great Britain and less than one-fifth of larger warehouses over 100,000 sq ft.[32]

Figure 1: Excerpt from Applicant's Rail Report (Document 7.2A, Rail Report, APP-312)

As per above, the Applicant highlights "the latent scale of demand for high-quality, rail-served floorspace in strategic locations" as driving an increase in the average size of proposed SRFIs.

The Applicant does not demonstrate any rail-related reason that the size of the warehouse estates at SRFIs has been increasing.

The Design Approach Documents[3] show no consideration of options for an SRFI design with substantially less warehousing

Illustrations provided by the applicant (reproduced below from pages 21-24 of APP-166) confirm that, at no point between 2018 and the present day was a site design involving substantially less warehousing considered. In fact, the scheme appears to have grown ever larger as the proposals evolved.

All designs, going back to 2018, exclusively focus on options where warehouses are built right up to the Heyford Park fenceline and up to (or even beyond) the road going East from Heyford Park. There appears to have been no substantial consideration of whether the site could fulfil its essential SRFI function with considerably less on-site warehousing.

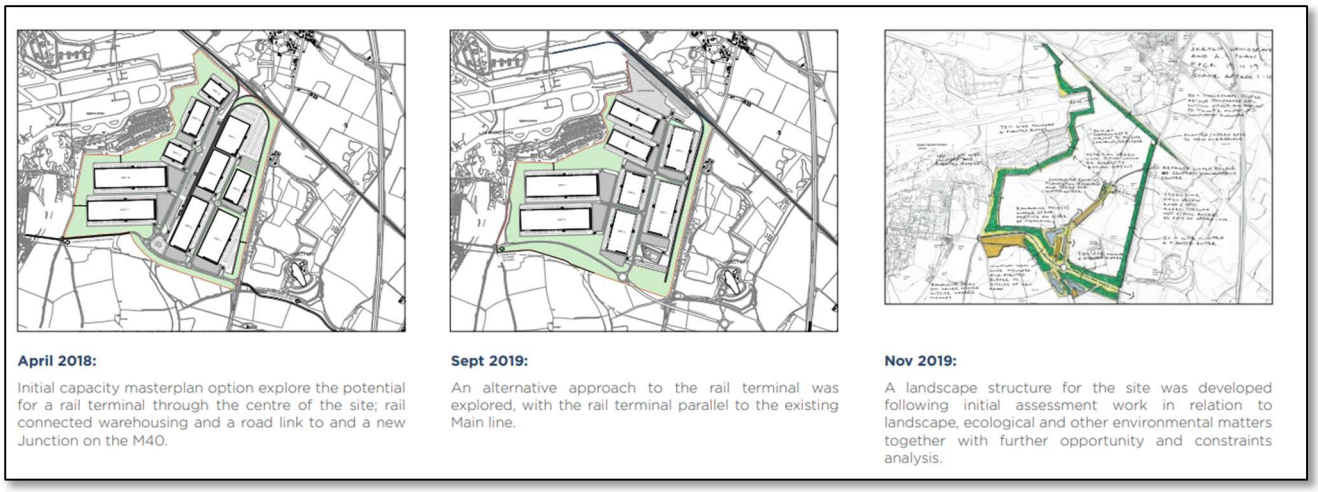
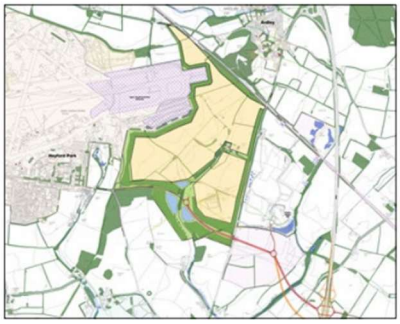


Figure 2: From Design Approach Document APP-166, page 21

[3] Application documents 5.5A/APP-166.



Feb 2020:

A landscape led masterplan was developed for the scheme. This included a rail terminal parallel to the existing main line, the retention of key landscape and ecological features through the centre of the scheme and development of new landscape bunds around the site. This option also included the potential for a new junction on the M40 and link road to it



June 2020:

More detailed design work was undertaken to refine and formalise the proposals with design consideration given to all aspects and areas of the potential scheme; including terminal layout and main line connections, the retention and enhancement of the central landscape spine together with the retained farm buildings, the retention of the Thames Water reservoir, the landscape structure around the scheme and surface water drainage



Nov 2020:

The broad structure of the scheme remain unchanged but the scheme was refined in relation to specific matters. A Lorry park was incorporated, the potential for the relocation of the IVC facility explored and additional land brought into the scheme to help deliver a comprehensive approach to the design and mitigation of the southern area of the site.

Figure 3: From Design Approach Document APP-166, page 22



Feb 2021:

Following extensive work with the transport working group an alternative approach to site access and highway mitigation was explored, with access taken directly from M40 Junction 10 with a Bypass to the village of Ardley. A proposed relief road around the north east of the village of Middleton Stoney is also explored.



March 2022:

The proposals evolved following further assessment work and design evolution. The design of the proposed road corridors evolved, as well as landscape detail across the Main Site. Details of the Central hub area progress and changes are proposed to the Heyford Link road to integrate better with the Middleton Stoney Relief road.



Oct 2024:

The project was partially paused to allow a full review of highway works. This resulted in changes to the proposed work to M40 Junction 10. Following this scheme refinement continued with the detailed design of road and rail infrastructure and additional land is incorporated into the scheme to provide opportunities for biodiversity net gain. The IVC facility is no longer proposed to be relocated.

Figure 4: From Design Approach Document APP-166, page 23



March 2026:

Changes to the proposals follow extensive consultation during 2025, including statutory consultation, together with finalisation of environmental assessment work. Key changes include additional bunding and detailed landscape detail along the Heyford Relief Road; alterations on the western part of the site with development set back from proposed housing, increased bund heights and widths and additional planting; alterations to the parameters on the western part of the site with maximum building height reduced from 25.5m to 18.5m and 21m and unit layout reconfigured.

Figure 5: From Design Approach Document APP-166, page 24

As an example, the more modest site outline shown below would 1) provide additional spacing towards already-consented housing development at Heyford Park, 2) utilise the natural depression of the landscape in the middle of the site to reduce its overall visual impact, 3) preserve approximately half of the Heyford-to-Oxford bridleway as a local recreational area, 4) eliminate the need for compulsory acquisition of certain third-party sites, while 5) providing adequate land for warehousing to support rail terminal needs.



Figure 6: Example of a more modest warehousing site outline that would significantly reduce the local harms associated with the proposed SRFI development while allowing sufficient space for warehousing to support its essential rail freight function.

The applicant has not considered any option with a reduced warehouse site outline and has shown no compelling reason that a smaller outline could not support the essential needs of an SRFI. In fact, the applicant's own benchmarking data and traffic modelling strongly suggests that a smaller site could indeed support those essential needs.

The magnitude of the modal shift to rail freight does not justify the extraordinary quantum of XXL warehousing development

As discussed in REP1-047, page 7-13, the Applicant's modelling of HGV and rail traffic shows that the Applicant expects 97%[4] of the incoming goods to arrive at the proposed OxSRFI warehouse site on HGVs, with only 3% arriving by train.

The magnitude of the modal shift from HGV to train which can be achieved by building the OxSRFI as currently proposed simply does not outweigh the considerable harms that are associated with the project. This confirms that the proposed warehouse estate is excessively large in relation to rail freight needs.

Conclusion

While there may be a compelling national need for new SRFIs, the Applicant has chosen to attach an excessively large XXL warehousing estate which, if consented, would cause unnecessary harm to the local area.

The Applicant's own submissions confirm that the proposed 603,850 m^2 is far greater than the 300,000 m^2 to 350,000 m^2 of on-site warehousing space that have been proven adequate to serve the needs of other SRFIs. Also, with just 3% of incoming warehouse freight projected to arrive by train at OxSRFI[5], the rail benefits are simply too small to justify this quantity of XXL warehousing development on arable greenfield land.

Based on this clear evidence, I invite the Examining Authority to conclude that the OxSRFI is a *Trojan horse* for a significantly oversized XXL warehousing estate, whose overall benefits are outweighed by its many harms.

[i] *Artificial Intelligence Disclosure: AI tools, mainly ChatGPT, were used in researching the topics discussed in this note and for drafting an initial version of this document.*

[4] Based on an assumed 4 trains per day. If 12 trains per day (maximum theoretical rail terminal capacity) is achieved, 92% would arrive at the warehouses by HGV, while 8% would arrive by train.

[5] Assuming 4 trains per day