OxSRFI

OXFORDSHIRE

STRATEGIC RAIL FREIGHT INTERCHANGE

PLANNING STATEMENT

Document number 5.4 (tracked)
Rev A

Regulation 5 (2)(q)

On behalf of
Oxfordshire Railfreight Limited

Prepared by Oxalis Planning Ltd
MarchOctober **2026**

PINS REF:	TR050008
Document Reference	5.4
APFP Regulation	5(2)(q)
Author	Oxalis Planning
Date	October 2026
Revision	A

CONTENTS

1.0 INTRODUCTION

2.0 SITE LOCATION AND CONTEXT

3.0 DESCRIPTION OF THE OxSRFI PROPOSALS

4.0 RELEVANT LEGISLATION AND POLICY CONTEXT

5.0 APPRAISAL OF THE DEVELOPMENT

6.0 CONCLUSIONS INCLUDING 'PLANNING BALANCE'

APPENDICES

Appendix One: Context Plan (including other development sites)

Appendix Two: NPS Policy Compliance Tracker

Appendix Three: Passenger Rail Station Note

Appendix Four: IVCF Odour Report

1.0 INTRODUCTION

1.1 This Planning Statement ('the Statement') is submitted on behalf of Oxfordshire Railfreight Limited (referred to as 'the Applicant') to accompany an application for a Development Consent Order (DCO) for a Strategic Rail Freight Interchange (SRFI) on land adjacent to the Chiltern Main Line and close to Junction 10 of the M40 in Cherwell District, Oxfordshire.

1.2 The Oxfordshire Strategic Rail Freight interchange proposals, known as 'OxSRFI' (and also referred to in this Statement as the 'Proposed Development', or 'the scheme'), meet the statutory requirements to form a Nationally Significant Infrastructure Project (NSIP), and so are subject to the 2008 Planning Act ('the Act')[1] and associated application and determination processes and procedures. The key elements of the proposals consist of an intermodal freight terminal together with substantial warehousing, extensive highway infrastructure and strategic landscaping and earthworks. A detailed description of the development and works proposed is included in Section 2 of this Statement.

1.3 The OxSRFI development comprises of three NSIPs together with associated development:

- The SRFI (including warehousing) (section 26 of the Act);
- Motorway alteration works to M40 Junction 10 (section 22 of the Act);
- Alteration of a trunk road (A43) (section 22 of the Act).

1.4 The vision for the proposals is to provide a Strategic Rail Freight Interchange in response to a range of national and local economic and policy drivers. In particular the proposals respond to the objectives set out in the National Networks National Policy Statement (referred to as the 'NPS') and fully accord with the requirements and criteria for SRFI's defined in that Policy. The Proposed Development responds directly to the growing market demand for increased use of rail freight, and the demand for large scale warehouse space, with the opportunity to utilise rail now and in the future.

1.5 The OxSRFI site is in an attractive and strategically significant location for distribution and logistics activity being located along the M40 between London and Birmingham and with the Chiltern Main Line – part of the strategic rail freight network – running adjacent to it. The OxSRFI location means it is within

[1] Available to view at: https://www.legislation.gov.uk/ukpga/2008/29/contents

4.5 hours of a large proportion of the UK population, which is a key locational requirement for the logistics sector. The location is therefore well placed to expand the existing network of SRFIs, with good access to both Midlands and South-Eastern markets and distribution networks.

1.6 The purpose of this Statement is to provide the information necessary to appraise the Proposed Development against the wide range of policies and guidance. In doing so this Statement draws in part on the suite of technical assessments, design work and reports which form the application, as well as professional judgement and experience to set out an appraisal of the scheme.

1.7 The application for the Development Consent Order has been the subject of an Environmental Impact Assessment (EIA) which is presented in the form of an Environmental Statement (ES, Document series 6.1), including an extensive range of technical reports and assessments. With regard to 'the Main Site' containing the proposed SRFI and warehousing this includes a Parameters Plan (Document 2.5) setting out the main development parameters which have formed the basis of the ES, and an Illustrative Masterplan (Document 2.6) which indicates one way in which the Proposed Development could be delivered in accordance with those parameters. The EIA has also considered the likely effects of the highways works which form part of the proposals (as described above, and shown on Components of Development Plan (Document 2.13), and the Highway Works Overview Plan (Document 6.2A, ES Appendix 2.1).

1.8 This Statement is structured as follows:

- Section 2 – describes the site location and its surroundings;
- Section 3 – describes the OxSRFI proposals in detail
- Section 4 – identifies relevant legislation and planning policy
- Section 5 –provides a detailed appraisal of the application with regard to relevant policies and guidance, including with regard to the conclusions of the ES and other supporting documents. It considers the application in terms of its social, economic and environmental effects.
- Section 6 – provides the conclusions of this Statement.

1.9 As referred to above, the application is supported by a range of reports which help to inform the judgments and conclusions reached in this Statement. These include:

- Main Site Design Approach Document ('D.A.D.'), (Document 5.5A), and
  - Central Hub D.A.D. (Document 5.5B)
  - Highways D~~,~~.A.D (Document 5.5C)
- Rail Report (Document 7.2A), including various appendices, and:
  - GB Railfreight Supporting Statement (Document 7.2B)
  - GB Railfreight Freight Capacity Report (Document 7.2C)
- Consultation Report (Document 5.1)
- Market Analysis Report (Document 7.1)
- Alternative Sites Assessment (Appendix 2.4 of the ES, Document 6.2D)
- Construction Environmental Management Plan (CEMP) (Appendix 2.3 of the ES, Document 6.2C)
- The ES (Document series 6) which includes the following topics as chapters
  - Transport
  - Air Quality and Odour
  - Noise and Vibration
  - Ecology and Arboriculture
  - Landscape and Visual Impacts
  - Lighting
  - Water Environment (including Flood Risk and Drainage)
  - Cultural Heritage and Archaeology
  - Ground Conditions
  - Socio-Economics Impacts including Health
  - ~~Waste &~~ Materials and Waste
  - Agricultural Land
  - Climate Change
  - Cumulative Effects

1.10 The different elements of the Proposed Development referred to throughout this Statement are set out in Table 1 below and are shown on the submitted Components Plan (Document 2.13).

Table 1 – Glossary of terms describing the Proposed Development

Development Element	Description
Application Site	the land encompassed within a red line boundary being all the land affected by the proposals to be described as the "Order Limits". This is the maximum extent of the land likely to be affected by the Proposed Development and will be reviewed as the scheme proceeds through consultation and engagement with stakeholders.
Ardley Bypass	a bypass to the east of the village of Ardley, including realignment of Ardley Road and associated works to footpaths and bridleways.
Ardley Tunnel Works	works to provide W8 gauge through the tunnel
Ashgrove Cottages	the retention of the existing cottages and their re-use for rail and estate management and other facilities
Central Hub	the development within the central part of the Main Site, centered around the listed building, which is to be used for a potential range of estate management and other facilities for workers and visitors on the Main Site
Foul Drainage Outfall	the provision of a foul drainage outfall to Bicester
Heyford Park Link Road (HPLR)	the length of new road between the B430 and Heyford Park including the Secondary Access.
Highway Works	the J9 Highway Improvements, J10 Highway Improvements, Ardley Bypass, Principal Access, Middleton Stoney Relief Road, Heyford Park Link Road, Secondary Access, ~~Other~~A4095 / B4030 roundabout works[2], other Local Highway Works and Active Travel Works.
J9 Highway Improvements	the highway works to be carried out in connection with the improvement of J9 of the M40 motorway.
J10 Highway Improvements	the highway works to be carried out in connection with the improvement of J10 of the M40 motorway, including works to the A43 Baynard's Green

[2] The improvement works at the A4095/B4030 roundabout will be delivered by the Applicant unless Oxfordshire County Council request a Section 106 Agreement contribution to be used to deliver improvements as part of a wider package of improvements in that area.

	roundabout and associated works to the local road network.
Landfill	the area adjacent to the Chiltern Main Line Railway which will include highways works, an opening to allow a rail connection into the Main Site and the reprofiling of landfill material.
Main Site	the area to be occupied principally by the Rail Terminal, the rail served warehousing and the Central Hub, incorporating rail connections from the Chiltern Main Line.
Middleton Stoney Relief Road (MSRR)	a relief road to the north east of the village of Middleton Stoney linking the B4030 to the B430.
Order Limits	this is the maximum extent of the land likely to be affected by the Proposed Development and will be reviewed as the scheme proceeds through consultation and engagement with stakeholders
Other Local Highway Works	the highway works to be carried out at the junction of Camp Road and Chilgrove Drive, Middleton Road, the B430 west of the Main Site, Quarry Cottages, Middleton Stoney Crossroads, ~~and~~ Aves Ditch, and Improvements to the A4095/B4030 roundabout in Bicester ~~(through a Section 106 Agreement contribution).~~see footnote 2 above).
Principal Access	the principal access to the Main Site from the B430.
Proposed Development	the entirety of the development for which approval is sought.
Rail Terminal	the terminal which deals with the transfer of containers from rail to HGV and vice versa.
Secondary Access	the secondary access to the Main Site for buses, emergency vehicles and pedestrians/cyclists only from the Heyford Park Link Road.
SRFI	the Strategic Rail Freight Interchange terminal

Formatted: English (United States)

Formatted: Font: Bold

Formatted: List Paragraph,Paragraph bullet, Indent: Left: 0 cm, Hanging: 1.5 cm

2.0 SITE LOCATION AND CONTEXT

2.1 The Application Site consists of land necessary to deliver a Strategic Rail Freight Interchange together with the landscaping and highway works associated with the SRFI. The total area within the Application Site (Order Limits) is 468.8 ha.

2.2 The **OxSRFI Main Site** is located between the B430 to its east, the former Upper Heyford Airfield (and proposed major redevelopment site) to its west, and it is immediately south of the Chiltern Main Line railway to the north. It is well defined by this existing infrastructure and features. The village of Ardley is located to the north of the Chiltern Main Line and is separated from the Main Site by intervening woodland and agricultural land. The village of Middleton Stoney lies approximately 1.5km to the south of the Main Site, separated by intervening agricultural land and associated landscape including copses and woodland parcels. The M40 Motorway runs nearby~~,~~ to the east of the Main Site and the Town of Bicester lies to the east of the M40.

2.3 The Main Site consists of agricultural land used for mixed arable and grazing purposes and includes the Ashgrove farmstead ("Ashgrove Farm") which comprises a number of farm buildings and residences, including a listed threshing barn. Currently within the Main Site is the Biffa operated 'In-Vessel Composting' (IVC) Facility which is an operational commercial food and garden waste composting facility. The IVC Facility lease ends in 2030 and will not be extended (requiring the operator to vacate the site) at that time if OxSRFI is approved. The IVC facility buildings and structures would be demolished as part of implementing OxSRFI. There is also an underground reservoir in the south east part of the Main Site which will remain. In connection with the reservoir there are some substantial water mains some of which are proposed to be diverted as part of the OxSRFI works.

2.4 The total area of the Main Site is 287.8 ha.

~~2.4~~2.5 The area around the Main Site has and continues to evolve as new development takes place. The extensive former US Airforce base at Upper Heyford is being transformed into a new settlement, with extensive new housing, schools, shops and new business uses consented and being delivered. A planning application was submitted in July 2025 for significant additional development which would see up to a further 9000 new homes as part of a 'new town' proposal being considered by the national New Towns

Taskforce[3]. It was confirmed in March 2026[4] that this 'new town' proposal has not been shortlisted by MCHLG as one of the seven locations proposed as new towns, but this major planning application remains 'live' and awaits determination by Cherwell District Council. Other smaller parcels of land close to the eastern edge of Heyford Park have also been consented for residential development. Consented (committed) and proposed sites are shown on the Plan at Appendix 1. To the east of the Main Site and east of the B430 is the Viridor Ardley Energy Recovery Facility ("Viridor ERF"), as well as the Ardley Fields Household Waste and Recycling facility and Ardley Landfill Site. Further south of the waste facilities is the active 'Dewars Farm' minerals quarry (limestone and clay). In addition to these existing commercial sites nearby, there have also been recent development proposals east of M40 J10, with schemes promoted by Albion Land and Tritax for logistics development refused planning consent by Cherwell District Council in January 2026. Both are subject to appeal proceedings ~~likely to begin later in 2026~~which are ongoing at the time of writing[5]. There are also two major leisure schemes of note in the locality, with the Great Wolf Water Park Resort having gained consent in 2021 and a live planning application by Puy du Fou for a theme park with Cherwell District Council for determination at the time of writing (see the Context Plan in **Appendix 1**).

~~2.5~~2.6 In addition, the town of Bicester has experienced significant growth in recent years driven by the Bicester Garden Town project, which aims to build 13,000 new homes by 2032. A large portion of this growth is focused in the North West Bicester area, with plans for up to 6,000 new homes, (with a further 1,500 homes proposed in the emerging Local Plan Review) as well as additional housing planned at South West Bicester and other strategic sites. Bicester, along with Banbury to the north, and Heyford Park represent the major focus of new strategic growth and development in Cherwell District's current, and proposed (via the Local Plan review), planning strategy.

~~2.6~~2.7 The **Highways Works** include land on both the eastern and western sides of M40 Junction 10 which is largely in agricultural use and already directly influenced by existing highways infrastructure. The proposed, less substantial works at M40 Junction 9/A43 are similarly closely related to the existing highway network. The site of some proposed highways works around Junction 10 includes the Padbury Brook watercourse.

[3] Cherwell planning application ref. 25/02190/HYBRID
[4] https://www.gov.uk/government/news/seven-new-towns-proposed-to-kickstart-housebuilding-push
[5] Albion Land Planning Application ~~reference~~references 21/03267/OUT and 21/03268/OUT (with other associated applications for infrastructure); Tritax Planning Application reference 22/01340/OUT.

~~2.7~~2.8 The proposed Ardley Bypass is on land to the east of Ardley, and crosses a number of existing field hedgerow boundaries, as well as the Chiltern Main Line railway. Similarly, the Middleton Stoney Relief Road, and adjoining land for ecological mitigation, includes agricultural land to the north and east of the village and includes sections of woodland as well as the Gagle Brook corridor.

~~2.8~~2.9 The Transport Assessment, and dialogue with the Transport Working Group (TWG) of relevant consultee bodies, including Oxfordshire County Council, has informed decisions regarding the need for the OxSRFI scheme to enable delivery of local improvements at the A4095/B4030 roundabout at the eastern end of the B4030 corridor on the western edge of Bicester~~.~~ (as referred to in Section 1 above, these works will be delivered by the Applicant unless Oxfordshire County Council request a Section 106 Agreement contribution).

3.0 DESCRIPTION OF THE OxSRFI PROPOSALS

Development Principles and Vision for OxSRFI

3.1 The OxSRFI proposals are a direct response to the Government's clear recognition of the urgent need for additional SRFI capacity, as explained in Section 4 of this Statement. National policy highlights the requirement for an expanded network of rail-connected facilities to accommodate forecast growth in freight demand, drive economic development, and secure environmental benefits by shifting the movement of goods from road to rail.

3.2 The Applicant's vision for OxSRFI is to unlock the full potential of this strategically located site by creating a high-quality Strategic Rail Freight Interchange of national importance. OxSRFI will serve both regional and national markets, while also linking directly to international supply chains through the UK's ports and the Channel Tunnel. The scheme directly addresses a gap within the current SRFI network, meeting a recognised market requirement for a facility capable of serving Oxfordshire, the Greater London conurbation, and parts of the Midlands.

3.3 The masterplanning, access, and landscape design principles for OxSRFI are focused on delivering a high-quality rail-served logistics hub. The approach makes the most of excellent transport links and local workforce availability, while striking a balance between the functional requirements of large-scale freight operations and the creation of a well-designed, attractive, and environmentally sensitive setting. The scheme also provides an opportunity to adopt modern methods of construction and incorporate high standards of design, reflecting its role as a nationally significant rail freight interchange.

3.4 As detailed further below, the OxSRFI proposals are anchored by a comprehensive landscape strategy, with key elements and parameters for the structural landscaping fixed. The proposals have evolved through careful assessment of the Main Site's constraints and opportunities, with a clear focus on managing environmental impacts. The strategy will deliver a coherent framework of green infrastructure across and around the site, with new buildings placed within landscaped plots and substantially screened by bunding and planting, minimising external views of the development from most local viewpoints. The approach to landscaping and visual mitigation has evolved and responded to proposed changes to parts of the immediate context of the SRFI site which is expected to see additional residential development (including at Heyford Park) nearby over the coming years. The submitted

Design Approach Documents (Documents 5.5A, 5.5B and 5.5C) contain further details about the design principles and evolution of the scheme since its inception, and give overall design details about the Main Site, 'Central Hub', and Highways components of the proposals. Later sections of this Statement also provide an assessment of the likely inter-relationships with nearby sites with reference to the ES (including Chapter 7 *Landscape & Visual*).[6]

3.5 Beyond meeting strategic freight needs, the Proposed Development will deliver wide-ranging economic benefits for the sub-region and local communities, while also providing extensive highway, ecological, and other benefits. This includes a package of road infrastructure upgrades, most notably enhancements to M40 Junction 10 to address capacity issues and ensure resilience alongside other planned highways improvements and mitigation. The transport strategy will improve the efficiency and reliability of key local routes, encouraging strategic traffic back onto the most suitable roads. The submitted transport and highways mitigation strategy follows significant engagement with the relevant consultees (National Highways, OCC, and CDC) via a Transport Working Group established in 2020.

3.6 The highway works are a central element of the proposals, in particular the Ardley Bypass which forms part of the access arrangements from Junction 10 of the M40, and the Middleton Stoney Relief Road. These new roads will deliver clear local benefits, in particular, reductions in through-traffic through both Ardley and Middleton Stoney villages and associated reductions in noise and air pollution. Careful landscaping and earthworks will ensure that any remaining visual and noise effects from these proposed new links are minimised and kept within acceptable levels.

3.7 The Proposed Development will also improve connectivity for local communities through the creation of new pedestrian and cycle routes, and new bus services, including links by a range of modes between the Main Site, Bicester and Heyford Park.

Proposed OxSRFI Scheme

3.8 The main components of the Proposed Development are listed below. A more detailed description of each of the main components is then set out. These should be read in conjunction with the Parameters Plan (Document 2.5), the Components Plan (Document 2.13), Schedule 1 of the Development Consent

[6] Separate Design Approach Documents also provide details specific to the Central Hub (Document 5.5B), and Highways (Document 5.5C) components of the scheme,

Order (Document 3.1) and the works plans/highway drawings submitted as part of the application for the DCO. The main components are:

- An intermodal rail freight terminal, including rail connections and improvements to the Chiltern Main Line including works to Ardley Tunnel, rail sidings, container storage, HGV parking and associated buildings;
- Up to 603,850 sqm (approx. 6.5 million square feet) of warehousing and ancillary buildings, plus up to 201,283 sqm of additional floorspace in the form of mezzanines.
- The retention, regeneration and re-use of Ashgrove Farm and associated buildings, including Ashgrove Cottages, as part of a 'Central Hub' to provide estate management, training and communal facilities to serve the site;
- A secure, dedicated HGV Parking area including driver welfare facilities;
- New road infrastructure and works to the existing road network, including improvements to M40 J10 and junctions on the A43 provision of the principal site access and associated works on the B430, a bypass to the village of Ardley linking the site directly with M40 J10, a relief road around the north eastern side of the village of Middleton Stoney, a link road connecting the B430 to Camp Road, improvements to M40 J9 and other highway improvements at junctions on the local highway network and related traffic management measures;
- New and improved pedestrian and cycle infrastructure both on the Main Site and in the surrounding area connecting the Main Site to local communities;
- Demolition of existing structures within the Application Site – the IVC Facility will be demolished after the lease ends in 2030;
- Earthworks to create development areas, construct the rail freight terminal and connections to the Mainline and form landscape screen mounding;
- The retention of key landscape features together with new strategic landscaping, general planting and biodiversity enhancements.
- On and off-site works associated with utilities including for foul drainage connections.

3.9 The components of the Proposed Development on the Main Site have defined parameters which are set out on the Parameters Plan and in the detailed description of development below. The parameters fix the disposition of the proposed uses including the intermodal rail freight terminal, the rail and road

corridors within the site, the built development zones containing the proposed warehousing and HGV parking area, the Central Hub area, areas of retained landscape and areas for strategic landscaping including strategic landscape mounding. The maximum heights of buildings and other infrastructure relative to AoD are also fixed, as are the relative heights of the strategic mounding, and the minimum finished floor levels. The defined parameters have been used to explain and test the proposals in relation to economic, social and environmental assessment criteria.

3.10 The application assumes that the Proposed Development would be operational up to 24 hours a day, 7 days a week, and the ES has been assessed on this basis as a worst-case. In practice, future occupiers on-site are unlikely to operate in this way from the outset, and some may not do so at all, or only operate on a 24 hour basis on a seasonal basis (e.g, to accommodate Christmas or other peak periods of activity).

3.11 The components of the Proposed Development listed above are each described in further detail below.

Formatted: Indent: Hanging: 1.5 cm

Rail Freight Terminal and Associated Infrastructure (Zones B and C and Rail Corridor)

3.12 The rail freight terminal, rail corridor and associated infrastructure (sidings, storage facilities, etc.) are located adjacent to the Chiltern Main Line in the northern part of the Main Site with proposed rail connections to allow for access to and from the Chiltern Main Line in both directions. The associated rail infrastructure will include rail reception sidings, container storage area and associated container transfer equipment, and refuelling facility. The terminal area will also include HGV parking relating to the terminal use, and associated ancillary built accommodation such as gatehouses, and estate management offices. This terminal area is identified as Zone C on the Parameters Plan (Document 2.5).

3.13 The rail connection from the Chiltern Main Line includes limits of deviation (shown adjacent to the Rail Corridor), with the route to be confirmed through the detailed design, also shown on the Parameters Plan. The Rail Corridor area will include associated landscaping, which will be confirmed through the detailed design.

3.14 The Chiltern Main Line lies in cutting where it passes the Main Site. Significant earthworks will therefore be required to form the rail connections and rail freight terminal as they need to be at a similar level to the main line. The south

eastern connection passes through the existing Ardley Landfill site. The required earthworks will therefore include the excavation and re-depositing (reprofiling) of existing waste material elsewhere in the Ardley Landfill site, on land included within the Order Limits, with a maximum height of material up to 128m AOD within the Landfill area (details are set out in ES Appendix 13.1).

3.15 The terminal is designed to accommodate trains of up to 775m length (maximum freight train length). The terminal would enable the transfer of freight from road to rail (and vice versa), as well as the storage of containers or other freight at the terminal itself. The Proposed Development is designed to allow rail sidings to be constructed directly into the yards of some of the warehouse units in Zones A1, A2 and A3.

3.16 A fully functioning rail freight terminal capable of accommodating a minimum of 4 trains per day will be built and completed prior to the occupation of 2.5 million sq.ft. (232,257 sq.m) of warehouse floor space on the Main Site. The area available will enable the terminal to be expanded in the future in response to market demand and activity within Zone C, with the potential for up to 12 trains a day.[7]

3.17 In addition to the above, Zone B is stated on the Parameters Plan as being an area which could be developed for 'Rail Freight Interchange and/or Development Area' – this will be confirmed through the detailed design in response to market requirements but could also include rail terminal related infrastructure and development as part of the SRFI.

3.18 When fully complete the terminal area will accommodate:

- East and West facing main line connections to the Chiltern Main Line together with appropriate signalling;
- 5 sidings each capable of stabling a full length 775m freight train, with 2 sidings closest to the main line being reception sidings and 3 handling sidings, although all sidings will be capable of receiving trains directly from the main line to minimise shunting;
- a 775m headshunt and additional sidings to provide direct access to the yards of some of the warehouses;

[7] National Policy (the NPS) explicitly recognises that warehousing on SRFIs may be delivered before final delivery or commissioning of rail connections (NPS paragraph 4.88) – also see Sections 4 and 5 of this Planning Statement.

- An extensive area for container storage, with the ability for efficient layout and operation through reach stackers and gantry cranes;
- Passive provision for future electrification;
- Management offices and welfare facilities;
- Gatehouses and extensive HGV parking areas;
- A maintenance compound.

Warehousing and Buildings (Zones A and B)

3.19 Zones A1-A5 on the Parameters Plan will accommodate the proposed warehousing. The maximum warehouse development footprint applied for will be 603,850 sqm (approx. 6.5 million sq.ft.) with an allowance also made for the provision of additional mezzanine floorspace (up to one third of the total floorspace –201,283 sqm).

3.20 Maximum building heights are proposed at up to 25.5m, but vary across the Proposed Development. In particular, lower maximum building heights of 21m and 18.5m are proposed in the western part of Zone A (Zones A4b and A4c respectively). Relatively smaller footprint buildings are likely in these zones given the reduced maximum height. Maximum building heights (in AOD) are defined on the Parameters plan (ranging from 133.4m AOD to 142.6m AOD across Zone A).

3.21 The number and precise layout of buildings is not fixed, but an Illustrative Masterplan (Document 2.6) is included with the application which shows one way in which this floorspace could be accommodated on the Main Site. However, the height and broad layout of development zones on the site are fixed via the Parameters Plan, with a table on the plan setting out the 'Schedule of Development Parameters' (see Document 2.5). The final, detailed layout of the OxSRFI scheme will be determined post consent, but the expectation is for a range of large floorplate building sizes to be provided. The layout of the Proposed Development allows for flexibility in the scale and the design of individual units so that it can meet a wide range of market requirements. This includes the ability to accommodate very large floorspace units to respond to the needs for National Distribution Centres.

3.22 Much of the built floorspace would be located on development plots sunk into the Main Site following the implementation of a proposed earthworks strategy to not only create flat plateau, but to also enable creation of landscaped mounds around the Main Site to form part of the visual screening (mitigation) and landscaping. Spot heights of the landscape mounds are identified on the

Parameters Plan (Document 2.5) between 127-132.5mAOD on the west, 116 to 132mAOD on the south, and 119 to 121mAOD on the east.

3.23 Zone A will also include an area of secure, dedicated, HGV parking. This provision will ensure that HGVs arriving early at the Main Site are able to wait in a safe, suitable location. This will include driver welfare facilities and will help ensure that the Proposed Development does not contribute to any impacts on the amenity of nearby communities caused by parked HGVs, particularly overnight. This provision will only be available for HGV visiting the warehousing or the terminal.

3.24 The Main Site will incorporate an estate road which will run from the Main Site access through the centre of the site, providing access to all parts of the Main Site. The connection between the Main Estate Road and the Heyford Park Link Road will be restricted to use for buses, cyclists, pedestrians, and for emergency access arrangements only.

3.25 In addition to the 'built' development described above, Zone A will:

- Be designed to allow rail sidings to be constructed directly into the yards of some of the warehouse units in Zones A1, A2 and A3);
- Include service roads including road access to the rail terminal;
- Include on-plot landscaping and planting;
- Include sub-stations and other utilities infrastructure; and
- Include bus stops.

Central Hub (Zone D)

3.26 Zone D covers the Central Hub area which comprises Ashgrove Farm which includes the existing Grade II listed Threshing Barn, as well as the Ashgrove Cottages located directly off the B430.The Farm house and associated buildings including the Threshing Barn, together with Ashgrove Cottages are proposed to be retained and re-used within the Proposed Development, and will be redeveloped for ancillary uses relating to the OxSRFI.

3.27 The proposals for the retention, regeneration and re-use of the Listed Threshing Barn as a Welcome Building are to be submitted in full with the application. The proposals for the remainder of the Central Hub area will be set out post consent, in accordance with the principles established by the Central Hub Design Approach Document (Document 5.8B). The ancillary uses that the Central Hub could accommodate include:

- Education and Training Hub
- Rail and Estate Management Offices
- Meeting Rooms
- Creche
- Cafe
- Gym
- Changing Rooms
- External seating, event and recreation space
- Community garden and orchard relaxation and well-being areas
- Outdoor sport / MUGA
- Landscape Management and maintenance Offices
- Landscape and site management Equipment Store
- Car and cycle parking

3.28 Full details for the listed Threshing Barn are included in the DCO submission (Document series 2.14[8]) but with only illustrative proposals for the remainder of the Central Hub area (Document series 2.16[9]). Full details for the remainder of the Central Hub will be provided through the submission of a scheme for approval in order to satisfy relevant DCO requirements.

Earthworks, and demolition of existing structures

3.29 To enable development to be delivered, substantial earthworks will be undertaken on the Main Site, with some areas of the Main Site being lowered significantly from existing ground levels. Most units will be located on plateaus with a portion of cut and fill required to create each plot, and currently only the western edge of Zone A3 on the Parameters Plan is placed wholly in cut (see Appendix 5 of the CEMP (ES Appendix ~~11.8).~~2.3, Document 6.2C)).

3.30 This change in levels is required both for the formation of the rail terminal and to establish the flat plateau required for the buildings. The 'cut and fill' exercise will enable the creation of the mounding around the Main Site and which forms a key part of the landscaping strategy. The earthworks strategy is to achieve an overall earthworks balance and avoid the import or export of materials. In total the earthworks strategy could require the cut and fill of approximately 3.8Mm3 of soils and rock across the Main Site to create development platforms, railbed and roadways.

[8] Document 2.14 (series) – Listed Building Plans
[9] Document 2.16 (series) – Central Hub Plans

3.31 The Main Site is currently used primarily for arable agriculture, and some of the small existing buildings and structures will be demolished.

Strategic landscaping, ecology and planting and rights of way

3.32 The Proposed Development includes provision of landscaping and tree planting as part of the mitigation of visual and landscape effects, as well as for biodiversity enhancement. The design of the Main Site incorporates a landscaping strategy which includes retention of existing woodland blocks along the Main Estate Road and south of the Heyford Park Link Road (HPLR). In particular, land within the Main Site to the south of the HPLR is entirely for biodiversity and landscaping enhancement.

3.33 The landscape strategy compliments the earthworks strategy which would create landscaped mounds around much of the Main Site perimeter, and which would form the bulk of the visual mitigation measures to substantially limit or eliminate outside views into the Main Site.

3.34 The strategy would ensure the establishment of a strong and cohesive framework of landscape and new habitat creation, delivering biodiversity gains and an environment that is pleasant to work in and travel around. The landscape strategy forms a main element of the overall development and would be fully integrated with the built development and infrastructure zones. In this respect it has not been designed (or should not be considered) as a separate part of the Proposed Development.

3.35 The existing underground reservoir, located between Zones A1 and A2 will be retained within an area of landscape/green infrastructure with access from the site Estate Roads.

3.36 The core principles of the landscape strategy are:

- The provision of extensive areas of land on the Main Site dedicated to landscape, green infrastructure, and habitat creation– representing approximately half of the total Main Site area.

- Conserved wooded areas and habitats, particularly along the central watercourse and around the perimeter of the Main Site.

- A mix of new native woodland, trees, hedgerows, scrub and open calcareous and conservation grassland habitats, extending around the built development zones. This will encompass broad landscape swathes to all sides of the Main Site and alongside all new highways and junction areas.

- Perimeter strategic mounding, extending around all sides and aspects of the Main Site. ~~Bund heights vary but many are around 10m high and 100m wide.~~Bund heights vary in relation to the minimum FFLs but as shown on the Parameters Plan (Document 2.5) they are approximately: 14.4m to 17m to the west, 7.9m to 14.9m on the south, and 6.9m to 8.9m on the east. Bund widths also vary but as shown within the Illustrative Landscape Cross Sections (Document 6.7G), they are approximately between 50m to 100m wide on the west, 40m to 50m wide on the east, and 30-35m wide on the north, with landscaping areas including bunds to the south being 300m in places along the HPLR. In conjunction with the conserved trees and planting and new woodland, scrub and other planting, this proposed mounding and planting will provide mitigation and visual screening to views from all directions around the Main Site. It should be noted that the bund at the north-eastern end of the former Upper Heyford Airfield has been reduced to a 'half-height' following discussions with Historic England in relation to preserving historic views from the runway (please refer to ES Chapter 10 (Heritage~~)~~), Document 6.10, for further details). It should also be noted that the bund to the south-west of the Main Site, alongside Zones A4b/c has been amended post the Stage 2 (statutory) consultation with increased height (by approx. 1m) and width in consideration of proposed and potential residential development at Heyford Park to the west.

- Sustainable drainage ponds and swales and other measures sited in the broad landscape areas and also within the Zone A development areas. In addition to satisfying drainage requirements, these will be designed for landscape, amenity and biodiversity benefits.

- New public access routes providing a variety of multi-user routes and opportunities within and around the Main Site. This will include circuitous loops around the perimeter landscape and green infrastructure areas, and connections to and extensions of existing routes and PROW within the immediate context of the Application Site.

This includes the provision of new connections linking the Main Site to Bicester and other nearby communities.

3.37 The Proposed Development includes an area for ecological mitigation within the Main Site to the north-west boundary. There are also additional areas for ecological mitigation which are outside but close to the Main Site, and within highways works areas, including land adjacent to the Middleton Stoney Relief Road, and land ~~further to the~~ north ~~west~~ of Ardley Road and south of the Chiltern Main Line. This includes land which forms part of the farmland bird ecological mitigation which was amended as part of the 'change application' submitted to the Planning Inspectorate in October 2026. Further details for these areas are included within ES Chapter 6 (Ecology including Arboriculture).

Highway Works

3.38 A package of highway works are proposed as part of the Proposed Development. These include alterations to Junction 10 of the M40 motorway and to the A43 trunk road, new road infrastructure and works to the existing road network, including provision of a principal site access and associated works on the B430, a bypass to the village of Ardley linking the site directly with M40 J10, a relief road around the north eastern side of the village of Middleton Stoney, the Heyford Park Link Road connecting the B430 to Camp Road, improvements to M40 J9 and other highway improvements at junctions on the local highway network and related traffic management measures

3.39 The proposed alterations to Junction 10 of the M40 and A43 trunk road each constitute nationally significant infrastructure projects in their own right because they trigger the relevant thresholds of the Planning Act 2008.

3.40 Further details about each component are set out below.

The Principal Site Access

3.41 The Principal Site access will be formed at the end of the Ardley bypass where it intersects with the B430. It will be a signalised roundabout and will incorporate a segregated left-turn lane to direct all HGVs leaving the Main Site northwards to the M40 Junction 10 via the Ardley Bypass. Buses will be permitted to turn right onto the B430

Junction 10 Highway Improvement Works and A43 Trunk Road Works

3.42 The proposed improvement works at J10 include enlarging Ardley roundabout, a new bridge over the M40, relocated and amended slip roads on and off the junction, widening of the A43, and amendments to the Cherwell, Padbury and Baynard's Green roundabouts.

Ardley Bypass

3.43 A new link road is to be constructed, connecting the Main Site directly to J10 of the M40. This new road will form a bypass to the village of Ardley. The Bypass is proposed from a reconfigured Ardley Roundabout (at the western side of the current Junction 10 of the M40) on an alignment east of the B430. It would tie-in with proposed re-located south facing M40 slip roads, and the preferred approach would see the existing Ardley Road - bridge over the Bypass route.

3.44 The existing B430 will be stopped up to the south of Ardley village and north of the new Main Site access roundabout, and so all through-traffic would be removed from the village.

3.45 The Ardley Bypass would bridge over the Chiltern Main Line railway to serve the Main Site and rejoin the existing B430.

Middleton Stoney Relief Road

3.46 This is a new single carriageway road to the north-eastern side of Middleton Stoney which will provide a link from the B4030 to the B430 north of Middleton Stoney.

3.47 The Middleton Stoney Relief Road (alongside other highways measures described within the Planning Statement, including the proposed HGV Routeing Strategy[10]) is forecast to remove existing traffic from the village centre.

Heyford Park Link Road

[10] Submitted as part of the Transport Assessment (TA) which forms part of the ES – the TA is ES Appendix 3.1, the HGV Routeing Strategy is Appendix 6 to the TA.

3.48 This is a new single carriageway road which will provide a link from the B430 north of Middleton Stoney to Heyford Park. The western extent of this new link will tie in with the current Camp Road.

3.49 A Secondary Access into the Main Site will be formed off the Heyford Park Link Road at the southern end of the Main Site. This will be restricted to bus, cycle and pedestrian and emergency access only – all other vehicular traffic will use the main access further north from the B430.

Junction 9 Highway Improvement Works

3.50 The Junction 9 works comprise capacity improvement works at the roundabout from the A34 to the M40 northbound.

Local Highways Works

3.51 Local highways works are proposed to be carried out at the junctions of Camp Road and Chilgrove Drive, Middleton Road, the B430 west of the Main Site, Quarry Cottages, Middleton Stoney Crossroads and Aves Ditch all in the vicinity of the Main Site.

3.52 In addition, works to the A4095/B4030 roundabout at Middleton Stoney Road and Vendee Drive west of Bicester are ~~currently~~ included ~~within the Application Site but ongoing discussions are being held with the County Council whereby the Applicant~~ and will ~~instead provide a financial contribution to works proposed to~~ be delivered by the Applicant unless Oxfordshire County Council~~. This will be secured through~~ request a Section 106 Agreement ~~once the level~~contribution to enable them to deliver works as part of ~~contribution has been agreed with the Council~~a wider package of improvements associated with other development nearby.

Walking and Cycling

3.53 The Proposed Development will include footpath and cycle way connections through the Main Site. This will include new provision along the Estate roads within the Main Site but also via diversions to existing Bridleways which cross the Main Site. Such routes will be diverted and extended to form circular loops within the landscaping areas, including a connection over the SRFI rail sidings to link to the existing bridge over the Chiltern Main Line. This would provide a connection to existing bridleways and footpaths that run northwards into Ardley.

3.54 The proposed new roads (Ardley Bypass and Middleton Stoney Relief Road) will incorporate public footpaths and cycle routes with at grade crossings provided to enable continued access and connectivity. Connections will be retained along the Bypass and Relief Road including an underpass to allow continued movement and connections with the existing network for all users including equestrians. In addition, new routes and connections to the existing network of routes to the east and south-east of the Main Site will be provided and facilitated to help deliver new connectivity from the Application Site to Bicester – this includes a route which facilitates improved cycle access to the B4030.

Utilities

3.55 The Proposed Development includes or requires the delivery of works to various utilities networks, both 'off-site' and within the Application Site. This includes different types of works including diversion, additional protection, or removal. The Applicant has engaged with network owners or operators, with dialogue ongoing, with a view to minimising disruption and ensuring connectivity and operation of these networks. As part of the site enabling works (which will be phased across the site) it will be necessary to divert the following assets, with works undertaken in accordance with relevant statutory, legislative or regulatory standards. The DCO also includes relevant 'Protective Provisions' which will help govern the works undertaken to existing utilities infrastructure.

3.56 Works will include disconnecting existing properties or premises from existing networks (for example, buildings proposed to be demolished at the existing IVC green waste facility). New connections will be required to water, foul water, and power networks. The Proposed Development includes the delivery of 'off-site' utilities comprising a foul drainage outfall to Bicester which runs from Middleton Stoney to Bicester within the B4030 corridor. Details of any works required (new infrastructure or network reinforcements) to secure the water connection required to the Main Site are subject of ongoing dialogue with Thames Water who are responding to the Applicant's request for a new connection.

Construction and Phasing

3.57 It is anticipated that the general construction programme will broadly be broken down into four key components, as listed below:

- Highways improvements:
  - J10 Highway Improvement Works;
  - A43 Trunk Road works;
  - Ardley Bypass link from J10 to and including the Principal Access;
  - Middleton Stoney Relief Road;
  - Heyford Park Link Road;
  - Other off-site works including
    - A43 Baynards Green Roundabout
    - Middleton Road
    - Works to the B430 east of the Main Site;
    - Quarry Cottages;
    - Works at the junction of Camp Road and Chilgrove Drive;
    - Middleton Stoney crossroads
    - Aves Ditch;
    - Minor works to M40 J9; and
    - Improvements to the A4095/B4030 roundabout ~~(through a Section 106 Agreement contribution).~~.
- On-site works (not including rail and buildings):
  - Site preparation;
  - Earthworks;
  - Landscaping;
  - Biodiversity enhancement works;
  - Main Estate Road.
- Rail Freight Terminal;
- Warehouses and Central Hub.

3.58 The above works are expected to be phased over a 7-year period, and this forms the basis of the assumptions in the ES. Assuming the Development Consent Order is made (i.e~~.,~~. assuming an approval) in 2027, construction works are assumed to begin in 2028. An indicative Master programme, appended to the Construction Environmental Management Plan (CEMP), (ES Appendix 2.3/Document 6.2C), sets out the anticipated programme and sequencing for the construction of the Proposed Development.

3.59 The proposed approach to the phasing of works would see a process of technical approvals alongside initial site preparation works. The development will commence with Main Site earthworks closely followed by highways works which comprise the Principal Access junction, Ardley Bypass (linking the

Principal Access to M40 J10), Junction 10 Highway Improvements, the A43 Baynard's Green Roundabout and Heyford Park Link Road.

3.60 A temporary construction access for the Main Site from the existing Ashgrove Farm access off the B430 will be in place until the main construction access is delivered, and will be at a similar point as the Principal Site Access off the B430.

3.61 The proposals involve a commitment to the construction of significant infrastructure early in the development process, including the rail terminal and rail connections to the main line, highway works, earthworks and landscaping.

3.62 A CEMP has been prepared and is appended to the ES (ES Appendix 2.3). It sets out the overarching systems and controls that will be adopted during the construction of the Proposed Development to minimise or avoid adverse environmental effects. The CEMP forms a key part of the mitigation proposed in the Environmental Statement for the construction phase of the Proposed Development. Compliance with the CEMP is secured through DCO requirement (Requirement 10) which establishes key measures or principles which will be taken forward in further detail through subsequent phase specific CEMPs (P-CEMPs).

4.0 RELEVANT LEGISLATION AND POLICY CONTEXT

4.1 This section of the Planning Statement provides an overview of the national policy context for the proposals, with a focus on planning policy, but with reference to other policy agendas and documents and strategies of direct relevance to the proposals for a strategic rail freight interchange.

Legislative Context – Planning Act 2008

4.2 The Planning Act 2008 (the 'Act') establishes the legal framework for applying for, examining, and determining applications for National Significant Infrastructure Projects (NSIPs). The OxSRFI proposals are submitted under Section 37 of the Act.

National Networks National Policy Statement ('NPS')

4.3 The NPS is the *"primary basis for making decisions on development consent applications on the national road and rail networks in England"*[11]. Therefore, this is the key source of policy for the DCO application and to those Highways Works which constitute an NSIP.

4.4 The NPS was updated in March 2024 by the Department for Transport ('DfT') and sets out the need for, and government's policies to deliver, development of NSIPs on the national road and rail networks in England. This includes Strategic Rail Freight Interchanges (SRFIs).

4.5 At paragraph 4.2 the NPS confirms:

> "*There is a presumption in favour of granting development consent for national networks NSIPs that fall within the need for infrastructure established in this NPS and which comply with the policies in this NPS.*"

4.6 The NPS provides policy and guidance on a range of matters relating to such issue as design, decarbonisation, the avoidance and mitigation of environmental effects, and other 'planning' related issues, and so in that regard explicitly shares a focus with the NPPF (discussed below) on helping achieve sustainable development (as confirmed at paragraph 1.11 of the NPS). The NPS notes that national networks *"provide critical long-distance links between places…. which in turn supports and stimulates economic*

[11] Paragraph 1.3 of the NPS (DfT, 2024)

growth"[12]. This explicit relationship with economic growth and productivity is recognised with reference to improved labour market connectivity and accessibility, providing individuals better access to jobs and education, and businesses better access to skills.

4.7 Section 2 of the NPS provides a context and overview of the various elements of the 'national networks' – road and rail networks, including reference to their role in the movement of freight and its contribution to the national economy and UK competitiveness and resilience. This includes an emphasis on the need to improve infrastructure that will deliver *"multi-modal impacts"*[13], and includes recognition of the need to improve the supply and quality of lorry parking and lorry parks to meet the needs of hauliers[14].

4.8 The specific role and importance of SRFIs as part of the national networks is identified throughout the NPS, including their role in *"maximising the long-haul primary trunk journey by rail and minimising some elements of the secondary distribution (final delivery) leg by road"*[15]. This forms part of a wider objective of the NPS to ensure national networks overall are *"putting sustainability at the forefront"*[16] and seeking to reduce environmental impacts. In that context and with reference to reducing carbon emissions, the role of rail, including rail freight, is explicitly supported by the NPS which identifies the significant (76% per tonne per km travelled) carbon emission reductions of rail as compared to road freight.[17]

4.9 In Section 3 the NPS identifies a range of 'drivers of need' for development of the national networks, and challenges facing these networks. This includes recognition of the 'costs', including economic costs, associated with poor road network performance due to congestion or other unexpected delays undermining reliability. This includes identification (on pages 33 – 36) of specific drivers of need for additional strategic rail freight interchanges. These are rooted in what the NPS identifies as some of the main challenges facing the national networks as a whole. In summary the drivers of need are:

- *Network performance and resilience* – the NPS identifies intermodal freight volumes as expected to remain a key growth market, and important to ensure resilient supply chains related to a diverse range of commodities. The NPS identifies SRFIs as facilitating important trade links and improving international connectivity which can enhance port

[12] Paragraph 2.1 of the NPS (DfT, 2024)
[13] Paragraph 2.3 of the NPS (DfT, 2024)
[14] Paragraph 2.4 of the NPS (DfT, 2024)
[15] Paragraph 2.15 of the NPS (DfT, 2024)
[16] Paragraph 2.18 of the NPS (DfT, 2024)
[17] Table 1 of the NPS (DfT, 2024)

growth[18]. SRFIs help lowering cost by streamlining processes, as well as through reducing trip mileage on national and local road networks.

- *User needs* – focused on the needs of the logistics industry which has been predominantly road-based, and where logistics operators need to reduce their carbon emissions through modal shift to rail. The NPS recognises this requires new SRFI facilities as "*a key part of this infrastructure*" (NPS paragraph 3.86) for storage, aggregation or consolidation, and movement of goods. To meet the needs of users the NPS is clear that "*there may be a greater demand for both an updated network of RFIs and SRFIs in new locations to support this aim*" (NPS paragraph 3.89).
- *Connectivity and supporting economic growth* – including recognition of predicted growth in seaborne trade fuelled by industrial and consumer demand, and a need for efficient and environmentally friendly links for freight to and from ports seen as "*key enablers for UK economic productivity and competitiveness*" (NPS paragraph 3.92). The employment creation benefits of SRFIs (direct and indirect) are also cited by this part of the NPS.
- *Environment* – based around Government's clear view that a mode shift of freight from road to rail is required to realist environmental benefits, but also the need to avoid harm wherever possible, and "*where adverse impacts are unavoidable adequately mitigating them*", with compensation considered a "*last resort*" in addition to delivering environmental enhancements[19].

4.10 The NPS refers directly to the government's rail freight growth target - it states (our emphasis):

> *"The Government has set **a target of at least 75% growth in rail freight by 2050** and is committed to meeting this figure[20]. To be able to successfully achieve that growth target, the right infrastructure needs to be in place, providing the necessary capacity and capability to support growth. **SRFIs are crucial to rail freight growth**."*[21]

4.11 How the OxSRFI proposals sit within the context of these drivers of need for SRFIs, and overall compliance with the NPS, is explored in further detail in Section 5 of this Planning Statement.

[18] Paragraph 3.84 of the NPS (DfT, 2024).
[19] Paragraph 3.97 of the NPS (DfT 2024).
[20] DfT 'Rail freight growth target': https://www.gov.uk/government/publications/rail-freight-growth-target/rail-freight-growth-target
[21] Paragraph 3.99 of the NPS (DfT, 2024)

4.12 Transport infrastructure is identified by the NPS as a catalyst and key driver of economic and sustainable growth and support local and regional development plans and the growth aspirations of local authority areas. In that context, and with reference to the Government's wider commitment to 'net zero' and other environmental considerations, the NPS identifies a *"compelling need for development of the strategic road and strategic rail networks, and strategic rail freight interchanges (SRFIs) – both as individual networks and as a fully integrated system."*[22]

4.13 Notwithstanding the clear emphasis in the NPS on the goal to enable modal shift from road to rail, especially for freight, the critical role of the road network in '*connectivity and economic growth*' is recognised, with an understanding that the road network delivers and unlocks economic activity. The economic growth enabled through connectivity delivered by roads are referred to in the international and national contexts, including through international freight and supply chain routes, but also at the regional or local levels where enhancement of the road network *"may unlock land for development, the creation of new employment centres, opportunities for large-scale logistics"*[23].

4.14 However, the NPS identifies road network performance challenges associated with significant increase in the use of the Strategic Road Network (SRN) in terms of vehicle mileage and resulting congestion which is identified as the largest contributor to delays on the road network[24]. The NPS refers to national road traffic projections and analysis based around assumptions and scenarios which reflect various economic, demographic and technological trends or agendas, including those based around decarbonisation and significant behavioural change. It states that continued absolute traffic growth is likely under all scenarios[25].

4.15 In this context, the NPS confirms that "*enhancements on the national road network will be necessary in order to ensure the national road network operates effectively in the face of growing demand*" (paragraph 3.31). Although the NPS does not identify a level of capacity which should be provided, nor state that new capacity should match demand, it does explicitly encourage a focus on addressing "*the worst constraints*" and interventions which address pinch points and

"*aimed at addressing localised issues to help address reliability,*

[22] Paragraph 3.22 of the NPS (DfT, 2024)
[23] Paragraph 3.33 of the NPS (DfT, 2024)
[24] Paragraph 3.27 of the NPS (DfT, 2024)
[25] Paragraph 3.28 of the NPS (DfT, 2024)

predictability, and capacity issues at specific locations, which can in turn improve overall performance of the wider network of local roads and the SRN in that location." (NPS paragraph 3.31).

4.16 The NPS confirms Government policy is to ensure user and other needs are met through *"improvements and enhancements to the existing SRN"*, where these are necessary to address the needs identified in the NPS. Enhancements will include *"new and improved junctions and slip roads"*[26].

4.17 The Government is committed to supporting the ongoing growth of rail freight due to the environmental and economic benefits of the sector (referred to above). With regard to the need for SRFIs, Section 3 of the NPS is clear about their importance in reducing costs, and reducing road mileage, while facilitating important trade links and international connectivity. This is contextualised with reference to the wider importance of the logistics industry to the UK economy and its role in delivering warehousing and distribution networks for UK manufacturers, importers and retailers. The network of distribution and warehousing sites across the UK are described as:

> *"vital hubs supporting efficient aggregation, disaggregation, and distribution of goods. SRFIs are a key part of this infrastructure, providing both storage processing facilities and onward connectivity to support the cross modal transfer of goods in order to deliver the full range of benefits rail freight can provide."*[27]

4.18 The NPS recognises that recently consented SRFIs are expected to create significant jobs on site and additional roles created in the wider economy through indirect and supply chain links at a range of skills levels.[28]

4.19 The NPS acknowledges difficulties in expanding existing rail freight interchanges in urban locations as they lack warehousing, and states a need for a wider network to *"further support the modern logistics and supply chain industry."*[29]

4.20 Further specific elements of national policy with regard to SRFIs, include:

- SRFIs in the right locations *"will be a critical element of realising the full*

[26] Paragraph 3.46 of the NPS (DfT, 2024)
[27] Paragraph 3.86 of the NPS (DfT, 2024)
[28] Paragraph 3.90 of the NPS (DfT, 2024)
[29] Paragraph 3.88 of the NPS (DfT, 2024

range of environmental benefits that rail freight can offer"[30];

- Government is clear on the need to encourage modal shift from road to rail, and (as stated above) considers *"SRFIs are crucial to rail freight growth"*[31].

4.21 As referred to above, the NPS provides policy and guidance on a range of matters, much of which is geared around ensuring development of the national networks achieve sustainable development. This element of the NPS is set out in Section 4, although with regard to SRFIs Section 3 also provides some guidance:

> *"SRFI developments will need to be sensitive to, respond to, and contribute to their environmental context. For developments such as SRFIs, it is likely that there will be local impacts in terms of land use and increased road and rail movements. It is important for the environmental impacts to be taken into account when planning a development, by avoiding harm wherever possible, where adverse impacts are unavoidable adequately mitigating or as a last resort, compensating as well as delivering environmental enhancements"*[32]

4.22 NPS paragraph 3.98 sets out a high-level vision:

> *"The government's vision for transport not only sets a path to net zero emissions, but it is also a vision for a sustainable transport system fundamentally better in every way, improving journeys, decarbonising the network, meeting the needs of freight and logistics at all links in the supply chain, driving growth and opportunity, and boosting the health of the nation. The government, therefore, believes it is important to facilitate the development of the rail freight industry including supporting growth areas such as intermodal where there is a high opportunity for modal shift"*

4.23 Indeed, the NPS states that:

> *"The government has therefore concluded that there is a compelling need for an expanded network of SRFIs throughout the country."*[33]

4.24 The NPS states that SRFI capacity needs to be provided:

[30] Paragraph 3.94 of the NPS (DfT, 2024)
[31] Paragraphs 3.96 and 3.99 of the NPS (DfT, 2024)
[32] Paragraph 3.97 of the NPS (DfT, 2024)
[33] Paragraph 3.103 of the NPS (DfT, 2024)

"at a wide range of locations, 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."[34]

4.25 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."[35]

4.26 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"*.[36] This leads the NPS to state that: *"There is a particular challenge in expanding rail freight interchanges serving London and the South East."*[37] This is clearly relevant to the OxSRFI proposals which are located in the south-east region of England.

4.27 SRFIs involve large structures, buildings, and the operation of heavy machinery, which can require continuous working arrangements. The NPS therefore acknowledges that the location of SRFIs may not be suitable adjacent to residential areas or environmentally sensitive locations such as National Parks or Areas of Outstanding Natural Beauty (now known as National Landscapes). It goes on to clarify however, that depending on circumstances, appropriate mitigation measures may be available to limit the impacts of visual intrusion, noise and light[38].

4.28 In terms of the locational requirements for SRFIs, 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 gauge[39]. In terms of road links, SRFIs must have

[34] Paragraph 3.105 of the NPS (DfT, 2024)
[35] Paragraph 3.103 of the NPS (DfT, 2024)
[36] Paragraph 3.104 of the NPS (DfT, 2024)
[37] Paragraph 3.105 of the NPS (DfT, 2024)
[38] Paragraph 4.83 of the NPS (DfT, 2024)
[39] Paragraph 4.82 and 4.89 of the NPS (DfT, 2024)

good connectivity to the strategic road network[40]. Section 5 of this Planning Statement confirms how OxSRFI accords with these and all other requirements of the NPS.

4.29 As a result of the characteristics of SRFIs and the forecasted growth in rail freight, the NPS confirms that the number of suitable locations for SRFIs will be limited[41] and that:

> *"Due to their requirements, it may be that countryside locations are required for SRFIs"*[42]

4.30 In terms of scale and design the NPS sets out various criteria, in paragraphs 4.85 – 4.89, that SRFI's should accord. These include the need to:

- facilitate modal shift from road to rail;
- deliver rail infrastructure and buildings in conjunction with the wider development, although the NPS notes that there may be a need to deliver warehousing ahead of the final deliver and commissioning of connections to the rail network;
- handle 4 trains a day and, where possible, be capable of increasing the number of trains handled;
- where possible, to have the capability of handling 775m trains, with appropriate infrastructure;
- have a layout which minimises the need for shunting and where possible allows for main line access for trains from either direction;
- allow for HGV access and parking together with proportionate services and facilities to support driver wellbeing.

4.31 In addition to the above specific requirements of the NPS as it relates to SRFIs, the NPS also includes (in Section 4) a requirement for national network infrastructure to consider the importance of 'good design'. Design is identified as a 'material consideration' in determining NSIP projects[43], and the NPS includes a set of generic design principles at paragraph 4.27. The extent to which the Proposed Development satisfies this and other relevant elements of the NPS is explored in Section 5 of this Statement.

4.32 Although there is a clear presumption in favour of granting consent for national networks NSIPs that fall within the need established, and comply with the NPS policies, the NPS also contains 'general policies and considerations' in Chapter

[40] Paragraph 1.5, footnote b of the NPS (DfT, 2024)
[41] Paragraph 3.103 of the NPS (DfT, 2024)
[42] Paragraph 4.81 of the NPS (DfT, 2024)
[43] Paragraph 4.29 of the NPS (DfT, 2024).

4 and a comprehensive list of the 'Generic Impacts' likely to be relevant in considering national infrastructure proposals in Chapter 5. These provide applicants with a clear indication of the range of issues which will be taken into account in decision-making. Much of this relates to linear infrastructure specifically – and so is relevant to the proposed Highway Works – with other issues to be considered for all NSIP schemes. Section 5 of this Statement along with further detail included within the Policy Compliance Tracker at **Appendix 2** to this Planning Statement considers how the proposals accord and comply with the NPS.

4.33 The key generic impacts of relevance include:

- Air Quality
- Carbon Emissions
- Biodiversity and ecological conservation[44]
- Waste management
- Dust, odour, artificial light
- Flood risk
- Land instability
- The historic environment
- Landscape and visual impacts
- Noise and vibration
- Impacts on transport networks
- Water quality and resources

4.34 In setting out the generic impacts to be considered and assessed, the NPS refers to other regulatory requirements such as EIA, and a Habitats Regulations Assessment (HRA) as well as matters such as business case, BNG, good design, road/rail safety, health and accessibility

4.35 The NPS also requires the Applicant to provide a "*proportionate*" consideration and description of the alternatives studied or considered, and the reasons for the choices made[45]. The Applicant has undertaken a proportionate assessment of potential alternative sites and this is set out in the Alternative Sites Assessment (ASA) which is included as an Appendix to the ES. The ASA demonstrates that there are currently no SRFIs along the M40 corridor, and none which serve Oxfordshire – an Oxfordshire SRFI would expand the

[44] Including with regard to effects on designated sites at paragraph 5.61 of the NPS.
[45] Paragraph 4.20 of the NPS (DfT, 2024)

existing network of SRFIs, fill an identified gap in the national network, meet the needs of existing and future businesses in Oxfordshire, and national logistics operations, seeking locations which can serve markets in the wider south-east, Midlands, and London.

4.36 The ASA concludes that after considering constraints such as environmental matters, planning policy, proximity to sensitive uses, and/or availability, there are no suitable alternative sites when compared to the OxSRFI site from a planning and environmental perspective. The ASA therefore demonstrates that the OxSRFI is the most preferable site within the established Search Area of the assessment for the delivery of an SRFI.

Material Considerations

National Planning Policy Framework (NPPF)

4.37 The NPS is the primary source of national policy guidance for NSIP projects such as Strategic Rail Freight Interchanges. The relationship between the NPS and more general national planning policy as contained in the NPPF is explained in the NPS, with the two documents being broadly consistent, but having different roles to play. The NPS states that the NPPF "*may be an important and relevant consideration in decisions on nationally significant infrastructure projects, but only to the extent relevant to that project*", but goes on to state that the NPPF "*does not contain specific policies for NSIPs".*[46]

4.38 The latest NPPF was published in ~~December 2024~~[47]~~. Paragraph 5~~August 2026 (post-submission of the OxSRFI DCO application), however for ease of reference during the examination period, this section of the Planning Statement is updated to reflect the latest NPPF. Paragraph 13 notes that although it does not contain specific policies for NSIPs, it may be one of the relevant considerations ~~against which~~when NSIPs are determined.

4.39 Both the NPS and NPPF, and associated Ministerial statements, clearly articulate the government's commitment to ensuring that barriers to sustainable economic growth are removed. An integral part of the planning system is a "*presumption in favour of sustainable development*" which is clearly expressed through the NPPF and set out in ~~Paragraph 11.~~Policy S3 (also see below).

[46] Paragraph 1.10 of the NPS (DfT, 2024)
[47] ~~A draft revised NPPF was published for consultation in December 2025.~~

4.40 A key thrust of the NPPF (Section ~~24~~) is the need to achieve sustainable development. As defined in the NPPF (see paragraph 17) there are three dimensions to sustainable development which are interdependent and need to be pursued in mutually supportive ways through the planning system which has:

- An economic role, ensuring sufficient land of the right type is available in the right ~~place,~~places, and at the right time, to support growth;
- A social role, supporting strong, vibrant and healthy communities;
- An environmental role, to enhance the natural, built and ~~built~~historic environment.

4.41 Policy S1 – includes the proposal that development plans should seek to meet the development needs of their area as a minimum.

~~4.41~~4.42 The NPPF and the NPS are therefore consistent in many respects, including with regard to many environmental and other planning related issues. Similar to Section 4 and 5 of the NPS which helps guide applicants regarding issues and requirements, the NPPF is structured around environmental and other policy issues. Some of the key issues from the NPPF which are relevant to the OxSRFI proposals are set out below.

~~4.42~~4.43 ~~Chapter 2 of the~~ NPPF Policy S3 sets out a presumption in favour of sustainable development. ~~The~~Part 1c of the policy explains that the presumption in favour of sustainable development means approving development proposals that accord with an up-to-date development plan ~~without delay or where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:~~and the decision-making policies in the Framework should be approved without delay.

- ~~The application~~Part 2 of ~~policies in~~ Policy S3 refers to the ~~NPPF that protect areas or assets~~principle of ~~particular importance provides a strong reason for refusing the~~ development ~~proposed; or~~

- ~~Any adverse impacts~~ outside of ~~doing so would significantly~~settlements and ~~demonstrably outweigh the benefits, when assessed against the policies in the NPPF as a whole.~~

cross-refers to Policy S5

~~4.43 With regard to economic development, the NPPF states that planning policies~~

Formatted: Font: Arial, 12 pt

Formatted: List Paragraph,Paragraph bullet, Indent: Left: 1.5 cm, Line spacing: single, Tab stops: Not at 1.25 cm

Formatted: Paragraph text, Indent: Left: 1.5 cm, First line: 0 cm, Line spacing: Multiple 1.15 li, Tab stops: 1.5 cm, Left

Formatted: List Paragraph,Paragraph bullet, Indent: Left: 1.5 cm, Line spacing: single

~~and decisions should help create the conditions in~~ which ~~businesses can invest, expand and adapt. Paragraph 85 states that *"significant weight"* should be placed on the need to support economic growth and productivity, considering both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. The NPPF is explicit about the importance of planning to meet the needs of a modern economy, including through identifying suitable locations for uses including *"freight and logistics"*[48]~~

~~4.44 Paragraph 87 is clear that planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for:~~

- ~~*"clusters or networks of knowledge and data-driven, creative or high technology industries"*;~~
- ~~*"storage and distribution operations at a variety of scales and in suitably accessible locations that allow for the efficient and reliable handling of goods, especially where this is needed to support the supply chain, transport innovation and decarbonisation"*; and~~
- ~~*"the expansion or modernisation of other industries of local, regional or national importance to support economic growth and resilience"*.~~

sets criteria for development

Formatted: Font: Italic

Formatted: Indent: Left: 2 cm, Tab stops: 2 cm, Left

~~4.45 With regard to 'sustainable transport', the NPPF (Section 9) requires transport and accessibility to be integrated with design issues and to contribute to "*making high quality places*", and with an explicit link to avoiding or minimising environmental impacts and the importance of ensuring "*a genuine choice of transport modes*" as part of efforts to reduce congestion and other effects.[49] The NPPF requires the potential impacts on transport networks to be understood and addressed.[50]~~

~~4.46 Planning policies are required to make provision for "*any large scale transport facilities that need to be located in the area[46], and the infrastructure and wider development required to support their operation, expansion and contribution to the wider economy*."[51] The footnote attached to that element of the NPPF~~

~~[48] Paragraph 86 of the NPPF 2024~~
~~[49] Paragraph 110 of the NPPF 2024~~
~~[50] Paragraph 109 of the NPPF 2024~~
~~[51] Paragraph 111 (including footnote 46) of the NPPF 2024~~

refers explicitly to SRFIs as an example of a large-scale facility.[52]

4.47 The NPPF contains a clear direction that proposals should only be refused where the effects on the road network are shown to be "*severe*", or the effects on highway safety are "*unacceptable*".[53] The NPPF requires developments likely to generate significant amounts of movement to provide travel plans, and to be supported by a transport assessment.[54]

4.484.1 Design issues are prominent within the NPPF, and found throughout, including but not limited to the section on '*achieving well-designed places*'.[55] Good design is described by the NPPF as "*a key aspect of sustainable development*".[56] The NPPF addresses good design both in functional as well as aesthetic terms, and refers both to built design as well as landscaping and the importance of trees to character and quality (and as part of adaptation to climate change).[57]

4.494.1 Other elements of the NPPF, including with regard to conserving and enhancing the natural environment (and transport, above) also refer to the importance of good design to avoid or mitigate adverse impacts, and create appropriate and sustainable places. These include in response to issues such as flood risk, landscape and visual issues, and biodiversity gains on which the NPPF provides specific guidance.

Formatted: Indent: First line: 0 cm

Formatted: Paragraph text, Indent: Left: 1.5 cm, Line spacing: Multiple 1.15 li, Tab stops: 1.5 cm, Left

Emerging updated (Consultation Draft) NPPF, 2026

4.50 In December 2025 MCHLG published a consultation draft of an updated NPPF. The draft document is subject to potential change following consultation and so currently attracts limited weight, but represents a clear signal of government intent with regard to the evolution of national planning policy.

4.51 The consultation draft NPPF has a very different structure to the existing NPPF, with the contents structured explicitly around recognisable and discrete policies within the document. In terms of content there is much carried forward from the existing adopted (2024) NPPF, but some of the most notable new or amended elements with regard. Relevant to the OxSRFI proposals include

[52] Footnote 46 of the NPPF 2024
[53] Paragraph 116 of the NPPF 2024
[54] Paragraph 118 of the NPPF 2024
[55] Section 12 of the NPPF 2024
[56] Paragraph 131 of the NPPF 2024
[57] Paragraphs 135 and 136 of the NPPF 2024 Policy DP3

~~(our emphasis added):~~

- ~~Policy S1 – **includes the proposal that development plans should seek to meet the development needs of their area** as a minimum.~~

4.44 ~~Policy~~scheme is S5 -part 1j which proposes ~~a new 'tilted balance' to assessing~~how development proposals outside settlements~~.~~ should be considered. The Policy proposes only certain forms of development should be approved outside settlements~~,~~ unless the benefits of doing so would be (our emphasis) "***substantially outweighed*** *by any adverse effects*", and these include: *"development which would address ~~"…~~an* ***evidenced unmet need****"* and where development would be well related to an existing settlement or would *"comprise* ***major development for storage and distribution****, purpose that accords with policy E3"*. ~~The draft NPPF proposes such developments should be approved unless the benefits of doing so would be substantially outweighed by any adverse effects.~~

4.45 With regard to economic development, Policy E2 ~~would give~~ gives *"substantial weight"* to the economic benefits of proposals for commercial development~~, a change from the current "*significant weight*" attached in the adopted NPPF~~[58]. When assessing whether there is an unmet need for such development, considerations include whether market signals indicate an undersupply of specific types of land or premises, and whether a proposal's specific locational requirements are met by existing allocations in the development plan. In the case of SRFIs, the primary policy is the NPS, and as discussed above, this identifies a "*compelling need*" for an expanded network of SRFIs.

4.46 NPPF Policy E3 – is a specific policy relating to 'freight and logistics', and says:

> *"1. To support the effective and efficient movement of goods, development proposals for freight and logistics uses and associated infrastructure should:*
>
> *a) Have good access to transport networks (including via sustainable transport modes where possible) appropriate to the type of development;*
>
> *b) Be sited and designed to limit environmental impacts (such as through the co-location or intensification of facilities to limit vehicle movements, and sensitive building design and landscaping). The impact on local residents or other neighbouring uses should be acceptable, taking into account*

~~[58] NPPF 2024, paragraph 85.~~

Formatted: Font: Arial, 12 pt
Formatted: Font: Arial, 12 pt
Formatted: Font: Arial, 12 pt
Formatted: List Paragraph,Paragraph bullet, Justified, Indent: Left: 0 cm, Hanging: 1.5 cm, Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, … + Start at: 1 + Alignment: Left + Aligned at: 0 cm + Indent at: 0.63 cm
Formatted: Font: Arial, 12 pt
Formatted: Font: Arial, 12 pt
Formatted: Font: Arial, 12 pt, Italic
Formatted: Font: Arial, 12 pt
Formatted: Font: Arial, 12 pt, Bold
Formatted: Font: Arial, 12 pt
Formatted: Font: Arial, 12 pt, Not Italic
Formatted: Font: Arial, 12 pt
Formatted: Font: Arial, 12 pt, Bold
Formatted: Font: Arial, 12 pt
Formatted: Font: Arial, 12 pt, Not Italic
Formatted: List Paragraph,Paragraph bullet, Indent: Left: 1.5 cm, Line spacing: single
Formatted: Font: Arial
Formatted: Font: Arial, Not Bold
Formatted: List Paragraph,Paragraph bullet, Justified, Indent: Left: 0 cm, Hanging: 1.5 cm, Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, … + Start at: 1 + Alignment: Left + Aligned at: 0 cm + Indent at: 0.63 cm
Formatted: Font: Arial, Not Bold, Italic
Formatted: Font: Arial, Not Bold
Formatted: Font: Arial
Formatted: Font: Not Bold
Formatted: Font: Arial, 12 pt
Formatted: Font: Arial, 12 pt
Formatted: Font: Bold
Formatted: Font: Arial
Formatted: Font: Arial
Formatted: Font: Arial

proposed mitigation, especially where night-time activity will be required; and

- *c) Provide sufficient and secure parking for lorries or other vehicles to cater for the anticipated use~~.~~."*

4.47 With regard to 'sustainable transport'~~Albeit not the primary source of national guidance for NSIP projects~~, the NPPF (Section 15), Policy TR1 sets out a vision-led approach to planning for transport and this includes under part e. *"Providing for any transport facilities that need to be located in the area, or for their necessary expansion or adaptation, and the infrastructure and wider development required to support them. This includes…lorry parking facilities, freight interchanges… and rail depots."*

4.48 Policy TR2 concerns local parking standards and part 3e details that parking standards should take into account: *"The appropriateness of setting different standards for the type and mix of development, including to address specific business requirements where commercial standards are being set; and of using ranges where a degree of flexibility is ~~a material~~desirable."*

4.49 Policy TR3 sets out criteria for development to be *"located where it can support sustainable patterns of movement"*. The Policy requires development proposals to reflect the principles which include locations which *"offer a genuine choice of transport modes"*. Opportunities to utilise existing or proposed transport infrastructure to support or improve (in the case of rural areas) more walking, wheeling, cycling and public transport use are also included.

4.50 Policy TR3 also includes consideration~~. In light of~~ of any significant adverse impacts from the development on the transport network, or on highway safety, should be mitigated *"to an acceptable degree"*, and that the environmental impacts of traffic and transport infrastructure should be identified, assessed and taken into account – including taking opportunities to avoid or mitigate any adverse environmental effects, and to secure net environmental gains.

4.51 In terms of assessing transport impacts, Policy TR6 explains that proposals should be refused where the adverse impacts on the road network are shown to be "*severe*", or the effects on highway safety are "*unacceptable*". The Policy also requires developments likely to generate significant amounts of movement to provide travel plans, and to be supported by a transport assessment.

Formatted: Font: Arial

Formatted: Font: Italic

Formatted: Indent: Left: 2 cm, Tab stops: 2 cm, Left

Formatted: Font: Italic

4.52 Design issues are prominent within the NPPF, and found throughout, including but not ~~, economic and market context for the OxSRFI proposals, notwithstanding its current~~ limited to Section 14 on '*achieving well-designed places*'. The NPPF addresses good design both in functional as well as aesthetic terms, and refers both to built design as well as landscaping and the importance of green infrastructure and trees for healthy living and as part of adaptation to climate change.[59]

4.53 Other~~weight and status, the above~~ elements of the NPPF, including with regard to conserving and enhancing the natural environment, and creating appropriate and sustainable places. These include in response to issues such as flood-risk, landscape and visual issues, and biodiversity gains on which the NPPF provides specific guidance.

4.~~52~~4.54 ~~draft revised NPPF are considered directly relevant. If~~In view of the above, updated ~~in the manner set out in the consultation document, NPPF~~ NPPF policies ~~would~~ offer a strengthened ~~and more~~ policy context for freight and logistics development generally – including outside of settlements – and provide clear, strong and explicit support and weight in favour of the OxSRFI proposals.

National Planning Practice Guidance (NPPG)

4.~~53~~4.55 The NPPF is supplemented by the Government's NPPG.

4.~~54~~4.56 Paragraph 031 (Reference ID: 2a-031-20190722) of the NPPG states that the logistics industry plays a critical role in enabling an efficient, sustainable and effective supply of goods for consumers and businesses, as well as contributing to local employment opportunities, and has distinct locational requirements that need to be considered in formulating planning policies (separately from those relating to general industrial land).

4.~~55~~4.57 Paragraph 032 (Reference ID: 2a-032-20190722) of the NPPG explains that when assessing what land and policy support may be needed for different employment uses, it will be important to understand whether there are specific requirements in the local market which affect the types of land or premises needed. Clustering of certain industries (such as some high tech, engineering, digital, creative and logistics activities) can play an important role in supporting collaboration, innovation, productivity, and sustainability, as well as in driving the economic prospects of the areas in which they locate. Strategic policy-

[59] Paragraphs 135 and 136 of the NPPF 2024 Policy DP3

Formatted: Paragraph text, Indent: Left: 1.5 cm, Line spacing: Multiple 1.15 li, Tab stops: 1.5 cm, Left

making authorities will need to develop a clear understanding of such needs and how they might be addressed taking account of relevant evidence and policy within Local Industrial Strategies.

Local Planning Policy Context – Local Development Plan

~~4.56~~4.58 The Local Planning Authority (LPA) for the area is Cherwell District Council (CDC). The current Local Development Plan comprises the Cherwell Local Plan (Part 1) which was adopted in 2015 with the Policy Bicester 13 re-adopted in 2016. The adopted Local Plan covers the period 2011-2031 and contains strategic planning policies for development and the use of land. In addition, a Partial Review in relation to Oxford's Unmet Housing Need was formally adopted as part of the Local Development Plan in 2020.

~~4.57~~4.59 As part of the vision in the adopted Local Plan, the Council will:

> *"develop a sustainable economy that is vibrant and diverse with good transport links and sound infrastructure…Our economy will grow to provide more diverse employment for our increasing population and reduce the need for our residents to travel outside the District for work"*
>
> *And…*
>
> *"focus on measures aimed at managing road congestion"*[60]

~~4.58~~4.60 In delivering the Council's vision, the Local Plan highlights that some of Cherwell's key economic issues are also wider community issues and states that these are: *"the need to address multiple deprivation; relatively large numbers of people without qualifications and basic skills, and the need to respond to a growing and ageing population".*[61]

~~4.59~~4.61 The Spatial Objectives for the adopted Local Plan includes:

> *"**SO 1** To facilitate economic growth and employment and a more diverse local economy with an emphasis on attracting and developing higher technology industries."*

[60] Paragraph A9 of the adopted Cherwell Local Plan (Part 1)
[61] Paragraph A20 of the adopted Cherwell Local Plan (Part 1)

*"**SO 10** To provide sufficient accessible, good quality services, facilities and infrastructure including green infrastructure, to meet health, education, transport, open space, sport, recreation, cultural, social and other community needs, reducing social exclusion and poverty, addressing inequalities in health, and maximising well-being."*

*"**SO 12** To focus development in Cherwell's sustainable locations, making efficient and effective use of land, conserving and enhancing the countryside and landscape and the setting of towns and villages."*

*"**SO 14** To create more sustainable communities by providing high quality, locally distinctive and well designed environments which increase the attractiveness of Cherwell's towns and villages as places to live and work and which contribute to the well-being of residents."*

~~4.60~~4.62 The Spatial Strategy for Cherwell focuses on growth at or adjacent to the District's main towns of Bicester and Banbury, with the single major location for growth being the former RAF Upper Heyford base which will deliver 2,361 homes.

~~4.61~~4.63 The following policies are relevant to the OxSRFI proposals:

- Policy PSD1: Presumption in Favour of Sustainable Development
- Policy ESD 1: Mitigating and Adapting to Climate Change
- Policy ESD 2: Energy Hierarchy and Allowable Solutions
- Policy ESD 3: Sustainable Construction
- Policy ESD 6: Sustainable Flood Risk Management
- Policy ESD 7: Sustainable Drainage Systems (SuDS)
- Policy ESD 10: Protection and Enhancement of Biodiversity and the Natural Environment
- Policy ESD 11: Conservation Target Areas
- Policy ESD 13: Local Landscape Protection and Enhancement
- Policy ESD 15: The Character of the Built and Historic Environment
- Policy Villages 5: Former RAF Upper Heyford

Emerging updated Local Plan (for 2020 – 2042)

~~4.62~~4.64 The LPA is reviewing the adopted Local Plan and a draft Local Plan was submitted to the Secretary of State for Examination in July 2025. The draft Local Plan covers the period 2020 to 2042.

~~4.63~~4.65 Strategic Objectives for the draft Local Plan include:

> *"**SO 1:** net-zero carbon new developments, with the highest possible sustainable construction standards, nature based solutions and low embodied carbon to ensure new developments deliver the highest viable energy efficiency, including the use of decentralised energy; and support a local zero-carbon energy system that reduces Cherwell's reliance on global fossil fuels and prioritises community energy."*
>
> *"**SO 2:** deliver developments that efficiently use local natural resources (particularly water), that minimise and are resilient to the impacts of climate change, including extreme weather events such as flooding, drought and heatwaves."*
>
> *"**SO 3:** Improve air quality. Protect and maximise opportunities for biodiversity net gain and the enhancement of Cherwell's natural capital assets, such as soils, watercourses, woodlands, hedges and ponds in order to capture and store carbon."*
>
> *"**SO 5:** Maintain and improve the natural and built and historic environment including biodiversity, landscape, and green and blue infrastructure networks by ensuring new development achieves high-quality design standards, and conserves and enhances the natural, historic, cultural and landscape assets of Cherwell."*
>
> *"**SO 6:** Prioritise active travel and increase the attraction of, and opportunities for public transport, ensuring high standards of connectivity and accessibility to services for all. Reduce dependency on the private car as a mode of travel, facilitating the creation of a net-zero-carbon transport network."*
>
> *"**SO 7:** Support a strong and sustainable economy within the district and Oxfordshire including the visitor economy, agriculture and food production, and ensure sufficient land is allocated to meet our identified needs"*
>
> *"**SO 14:** Protect and enhance the historic environment, including protecting and enhancing cultural heritage assets, archaeological remains, conservation areas, registered parks and gardens, and promoting inclusive access to local assets where appropriate."*

~~4.64~~4.66 The settlement hierarchy for the draft Local Plan, and focus for development over the plan period, again comprises the settlements of

Banbury and Bicester. Heyford Park is also listed as the next category for development as a local service centre.

~~4.65~~4.67 Other draft policies of relevance to the OxSRFI proposals include:

- Policy CSD 1: Mitigating and Adapting to Climate Change
- Policy CSD 3: Achieving Net Zero Carbon Development, Non-residential
- Policy CSD 5: Embodied carbon
- Policy CSD 6: Renewable Energy
- Policy CSD 7: Sustainable Flood Risk Management
- Policy CSD 8: Sustainable Drainage Systems (SuDS)
- Policy CSD 11: Protection and Enhancement of Biodiversity
- Policy CSD 12: Biodiversity Net Gain
- Policy CSD 13: Conservation Target Areas
- Policy CSD 16: Air Quality
- Policy CSD 17: Pollution and Noise
- Policy CSD 18: Light Pollution
- Policy CSD 19: Soils, Contaminated Land and Stability
- Policy CSD 22: Sustainable Transport and Connectivity Improvements
- Policy CSD 23: Assessing Transport Impact/Decide and Provide
- Policy LEC 3: New Employment Development on Unallocated Sites
- Policy COM 10: Protection and Enhancement of the Landscape
- Policy COM 13: Settlement Gaps
- Policy COM 14: Achieving Well Designed Places
- Policy COM 15: Active Travel – Walking and Cycling
- Policy COM 16: Public Rights of Way
- Policy COM 26: Historic Environment
- Policy COM 27: Conservation Areas
- Policy COM 28: Listed Buildings
- Policy HEY 1: Heyford Area Strategy

Oxfordshire Minerals and Waste Local Plan – Part 1 Core Strategy (September 2017)

Formatted: Indent: First line: 0 cm

4.68 The Oxfordshire Minerals and Waste Local Plan was adopted by the County Council in September 2017 and it sets out the vision, objectives, spatial planning strategy and policies for meeting development requirements for the supply of minerals and the management of waste in Oxfordshire over the

period to 2031.

4.69 In terms of relevant policies, the OxSRFI site sits within the extensive North West of Bicester (crushed rock) Mineral Strategic Resource Area (Policy M3) and a Minerals Safeguarding Area for Crushed Rock (Policy M8) on the Polices Map North. Other strategic resource areas for this same crushed rock (limestone) resource are identified across other parts of the Plan area.

4.70 Policy M8 (Safeguarding mineral resources) explains that mineral resources in the Mineral Safeguarding Areas are safeguarded for possible future use. Development that would prevent or otherwise hinder the possible future working of the mineral will not be permitted unless it can be shown that:

- *"The site has been allocated for development in an adopted local plan or neighbourhood plan; or*
- *The need for the development outweighs the economic and sustainability considerations relating to the mineral resource; or*
- *The mineral will be extracted prior to the development taking place."*

4.71 Policy W11 (Safeguarding waste management sites) sets out that:

"Proposals for development that would directly or indirectly prevent or prejudice the use of a site safeguarded for waste management will not be permitted unless:

- *the development is in accordance with a site allocation for development in an adopted local plan or neighbourhood plan; or*
- *equivalent waste management capacity can be appropriately and sustainably provided elsewhere; or*
- *it can be demonstrated that the site is no longer required for waste management."*

4.72 Policy W2: 'Oxfordshire waste management targets' sets out OCC's waste management targets for commercial / industrial, as well as construction, demolition and excavation (CDE) waste to be met by the years 2021, 2026 and 2031.

4.73 Policy W3 (Provision for waste management capacity and facilities required) sets out the provision for additional waste management capacity to manage the non-hazardous element of the principal waste streams.

Other national policy documents

'Future of Freight: a long term plan' (Department for Transport (DfT), 2022)

Formatted: Tab stops: 1.5 cm, Left + Not at 1.25 cm + 1.3 cm

~~4.66~~4.74 The '*Future of Freight – A Long Term Plan*' Report' by DfT is relevant and considered material, with synergy between that and the NPS which refers to it frequently. In capturing key points and issues, the Executive Summary states:

> *"Freight and logistics has a key role to play in the delivery of a number of public policy outcomes. The sector can make a significant contribution to levelling up and strengthening the union as a geographically distributed employer supporting economic activity across the UK. And the sector is the gateway for UK plc to imports, exports and global markets"*

~~4.67~~4.75 The report estimates that the freight and logistics sector contributes 10% of the UK non-financial business economy and £127 billion gross value added (GVA) through more than 200,000 enterprises.[62] It is clear on the importance of a strong sector to wider policy (economic and environmental) objectives, and recognises the role of rail in the complex supply chains within the logistics and distribution sector.

~~4.68~~4.76 *The Future of Freight* identifies a range of proposed themes and actions at national and local levels, including in relation to such issues as planning, skills, and 'net zero'. It identifies a disconnect between the freight and logistics industry and planning processes, and a need to better communicate the needs of a changing and innovative sector, and identifies a goal of a planning system which *"fully recognises the needs of the freight and logistics sector now and in the future and empowers the relevant planning authority to plan for those needs."*[63]

~~4.69~~4.77 In terms of SRFIs, paragraph 5.20 of the report states that the Government will, through its (then future) review of the NPS: "*consider the growing importance of major freight schemes to our economy, particularly the increasingly important role of Strategic Rail Freight Interchanges (SRFIs)".*

~~4.70~~4.78 *The Future of Freight* also referred to the intention to introduce a 'freight growth target'. This was subsequently confirmed by government as being to increase freight by 75% by 2050 (referred to in the NPS, at paragraph 3.99).

[62] 'Future of Freight', DfT 2022, paragraph 1.4
[63] 'Future of Freight', page 9

Decarbonising Transport – A Better, Greener Britain (2021)

~~4.71~~4.79 The 'Decarbonising Transport' document prepared by the DfT (2021) states a commitment by the Government to: *"support and encourage modal shift of freight from road to more sustainable alternatives, such as rail…"* (p. 138).

~~4.72~~4.80 The document goes on to state that: *"The modal shift of freight from road to rail would not only lead to a reduction in GHG levels, but also reduce congestion and noise pollution"* (p. 139)

Sub-regional economic context

Enterprise Oxfordshire

~~4.73~~4.81 Enterprise Oxfordshire, previously known as the Oxfordshire Local Economic Partnership (OxLEP) has produced a Strategic Economic Plan (SEP) (2023) and states the following ambition for growth to 2033 in the county:

> *"By 2033, people and communities across Oxfordshire will be benefitting from new opportunities which are created sustainably through local enterprise and innovation. These will enhance further their wellbeing in an outstanding local environment. They will also underpin, complement and support a wider innovation ecosystem which will continue to be of global significance, transforming for the better the lives of people across the world."*

~~4.74~~4.82 The OxLEP SEP also sets out the following four key objectives to deliver on their ambitions for the county:

- Enable Oxfordshire's businesses to thrive and encourage pervasive innovation.
- Widen access to current opportunities and equip people and places as jobs change over the next decade
- Secure resilient infrastructure for planned growth, consistent with Oxfordshire's commitment to net zero carbon by 2050.
- Ensure that Oxfordshire's places are sustainable and inclusive, and that local communities flourish.

~~4.75~~4.83 The OxLEP's Local Industrial Strategy (August 2020) notes that the logistics sector is key to supporting new jobs growth over the next decade and

that improvements to the strategic rail network and other infrastructure projects will be vital for supporting the sub-regions growth and prosperity and increasing productivity.

~~4.76~~4.84 A broad objective of encouraging and supporting rail freight has since been captured by the recent 'OxRail 2040' Rail Strategy produced by the County Council.

Oxfordshire Growth Commission

~~4.77~~4.85 The Commission is a government appointed body established in 2025 and is tasked with overcoming development constraints to growth. While accelerating housing delivery is a major focus, it explicitly seeks to enable and unlock economic growth and wider investment in all forms of critical infrastructure. In broad terms its role is to identify measures to accelerate sustainable economic, housing, and infrastructure growth across the county working with local authorities, businesses, and other bodies such as universities. The Commission forms part of the network of bodies operating within the wider 'Oxford – Cambridge Growth Corridor'. Seeking to secure improvements in transport infrastructure and connectivity, including public transport and 'active travel' form part of the high-level focus of the commission's interim report of December 2025.

5.0 APPRAISAL OF THE APPLICATION

5.1 This section of the Planning Statement contains the Applicants appraisal of the suitability of the Proposed Development having regard to relevant policies and other material considerations.

5.2 In doing so, it cross-refers to the explanation and description of the policy context and 'policy need' issues set out in Section 4 and has regard to the wider context including the 'market need' issues identified in the Market Analysis Report (Document 7.1). It draws on, where relevant, the likely effects and impacts of the proposals assessed within the Environmental Statement (ES) and the contents of the Design Approach Documents (DADs) (Document series 5.8) which form part of the application.

5.3 As identified in Section 4.0, the NPS is the primary source of national policy for NSIP projects such as the OxSRFI and so the following Section of this Statement appraises the different elements of the Proposed Development against the relevant policies of the NPS. The structure of this Section begins with an Overview of the scheme, before considering the relevant key headings found in the NPS:

- Need for the OxSRFI scheme;
- Locational and functional requirements of SRFIs
- Criteria for good design for national network infrastructure
- 'General Considerations' and 'Generic Impacts' set out in the NPS; and
- Overall Policy compliance.

5.4 Also see the NPS Policy Compliance Tracker at **Appendix 2** of this Planning Statement which supplements the assessment provided here, and helps sign-post to other elements of the DCO Application.

5.5 This analysis informs a judgement on the overall planning balance (set out in Section 6.0 of this Planning Statement).

Overview

5.6 The NPS identifies five drivers of need for development of the 'national networks' (pages 18 - 21) which cut across various policy, economic and environmental topics. This includes reference to the need for additional investment and improvement regarding the rail network, and infrastructure relating to freight. These high-level drivers of need are:

- *Maintaining network performance and meeting customer needs* – including reference to the need for new infrastructure to meet the challenges of population growth and economic growth, and responding to the needs of freight users on road and rail networks.
- *Supporting economic growth* – recognising the importance of infrastructure as "*a catalyst*" to support productivity, connectivity, and economic growth and in enabling sustainable development.
- *Ensuring resilience in networks* – with a focus on responding to risks and taking opportunities to ensure the network remains fit for purpose including with regard to the movement of goods, and changing needs of the economy.
- *Supporting the government's environment and net zero priorities* – including an emphasis on NSIPs seeking to improve and enhance the environment at different spatial scales, with examples including reducing congestion and delivering biodiversity improvements.
- *Maintaining and enhancing the safety of national networks* – with safety identified as of "*paramount importance" and linked to resilience of the networks.*

5.7 Having regard to these drivers of need the government concludes with a clear statement (our emphasis):

> "*at the strategic level* ***there is a compelling need for development of the strategic road and rail networks, and strategic rail freight interchanges (SRFIs)*** *– both as individual networks and as a fully integrated system*"
>
> (NPS, paragraph 3.22).

5.8 The OxSRFI will make a direct and significant contribution to the delivery of these objectives. The proposed development directly responds to the 'compelling need' for SRFIs, and as demonstrated through the wider suite of application documents, including the ES (Document series 6.1), Market Analysis Report (Document 7.1), and Rail Reports (Documents 7.2A, 7.2B and 7.2C) is proposed at a location and in a form that can appropriately minimise and mitigate the likely impacts. In response to the above NPS drivers of need OxSRFI will;

- Meet the needs of a growing and evolving logistics sector which is critical to the functioning of the national, regional and local economy,

bringing about major investment, creating around 9600 FTE new jobs (gross) and facilitating sustainable economic growth.

- Add to and expand the network of SRFI's to meet the demands of businesses across sectors, and directly enable the continued growth in the use of rail freight, contributing to the shift in the movement of goods from road to rail.
- Reducing carbon emissions and congestion (through a reduction in HGV mileage) associated with the movement of freight, and delivering high-levels of sustainability through new energy efficient distribution buildings. The proposals consider and respond directly to the specific challenges of climate change, and the low carbon and 'net zero' agendas.
- Make investments in delivering both road and rail infrastructure the scheme will improve journey quality, reliability and safety, including improvements in local journey times and a reduction of traffic on inappropriate routes (due to improvements on the strategic routes). New roads will reduce through-traffic in both Ardley and Middleton Stoney.
- The investment in road and rail infrastructure, together with improvements to pedestrian and cycle facilities and enhanced or new public transport provision, will contribute to objectives linked to sustainable economic growth, and enabling active, sustainable, modes of local transport.

5.9 The following parts of this Section of the Planning Statement consider the Proposed Development against the detailed elements or requirements of NPS policies, but at the strategic level it is clear that without SRFI's logistics activity will be necessarily road based.

5.10 OxSRFI is in the right location to address market requirements and expand the network of SRFI's so there is greater access to and opportunity for increased use of rail freight services. The site is of the right size to accommodate a strategic rail terminal capable of handling the required length and number of trains (with scope for expansion of the terminal), and allows for strategic scale distribution warehousing to be provided to meet market needs, a proportion of which can be directly rail connected. The site provides high-quality access to both the strategic road and rail networks, with significant new infrastructure and commitments to delivery that can be secured through the imposition of suitable DCO Requirements. This includes commitments to deliver the Ardley Bypass early in the construction programme, and for the

terminal to be operational prior to occupation beyond a fixed floorspace figure as set out in Section 3 above (and secured via the DCO as submitted).

5.11 The NPS recognises that, due to their operational requirements, SRFI's may need to be located in the countryside. OxSRFI will result in the loss of countryside. However, the site has a particular context (and indeed an evolving one) which means the impact of change can be contained, managed and controlled and where through scheme design and mitigation, the environmental effects of the scheme can be very successfully mitigated. The Main Site is located between the B430 to its east, the disused Upper Heyford Airfield and Heyford Park new village to its west and the Chiltern Main Line to its north. It is well defined by these existing urban features. The villages of Ardley and Middleton Stoney lie close by but are separated by intervening agricultural land and landscape. Because of the topography of the area and the approach to scheme layout, significant landscape bunds can be provided to minimise and to a large extent screen, views of the development from these existing and emerging communities. These landscape and earthworks measures form a fundamental component of the scheme and are critical in ensuring that's its environmental effect are acceptable and its impact on local communities minimised.

5.12 The context around the Main site has and continues to evolve as new development takes place. There are significant planned and proposed development, which will transform the area in the coming years. Details of these planned and committed schemes are shown on the Wider context Plan, attached to this Statement at Appendix One.

5.13 The extensive former US Airforce base at Upper Heyford is being transformed into a new settlement and an application for further development (9000 homes) to create a new town has recently been submitted. To the east of the Main site is the Viridor Energy Recovery facility as well as Ardley Fields Household Waste and Recycling facility and Ardley Landfill site. South of these facilities is the active Dewars Farm mineral quarry. East of the M40, Bicester has experienced significant growth in recent years driven by the Bicester Garden Town project, which aims to build 13,000 homes by 2032. A large proportion of this growth is focussed on the North West Bicester Area, with 6000 dwellings and a further 1500 dwelling proposed in the emerging Local Plan, growing the town significantly towards the M40 and the Main Site.

5.14 There are also major commercial development proposals in the area. This includes two major schemes to the northeast of Junction 10[64], which following Officer recommendations for approval were recently refused consent by the Council. There are also two leisure schemes proposed, with the Great Wolf Water Park Resort gaining consent recently and an application recently submitted by Puy Du Fou for a theme park.

5.15 Our overarching conclusion, set out in this Statement, are that the significant benefits of the proposal greatly outweigh the residual adverse impacts and that development consent should be granted in accordance with the presumption in favour of NSIPs set out in the NPS.

Need for the OxRFI scheme

5.16 As referred to in Section 4 of this Statement, and above, the NPS identifies a clear and 'compelling' need for an expanded network of SRFIs, and reflects the role they perform in meeting a range of 'drivers of need'. This forms part of a wider, clear statement about the need for, and importance of, investment to improve or enhance the 'national networks' as a whole, including interventions to improve the performance of the strategic road network.

5.17 The NPS identifies specific drivers of need for SRFIs – these are set out in detail in Section 4, and include a number of economic and environmental (including carbon reduction) objectives and trends. The NPPF also reflects the importance of meeting the requirements of the 'freight and logistics sector', recognising that it – in common with many other critical economic sectors – has specific locational requirements which the planning system needs to both understand and seek to accommodate through positive planning policies and decisions[65].

5.18 At the heart of the need for SRFIs lies a recognition in Government policy that they are essential to enable a shift of freight from road to rail, delivering and supporting economic growth and competitiveness across sectors, and reducing the carbon emissions associated with that economic activity. Without new SRFIs provided as envisaged by the NPS the logistics and distribution sector will necessarily remain largely road-based.

[64] Applications by Albion Land, and Tritax – discussed later in further detail.
[65] ~~Paragraph 81c,~~Policies E1, E2 and ~~87b~~E3 of the NPPF, MCHLG, ~~20242~~2026.

Formatted: Font: 9 pt
Formatted: Font: 9 pt

5.19 The NPS is clear on the important role played by SRFIs in supporting and enabling a competitive and efficient logistics industry, as well as ensuring resilient, effective and efficient supply chains to handle, move, and store goods and commodities. The NPS is also clear that efficient transport, including rail freight, are required to 'boost' and strengthen international trade[66], and that SRFIs enable further growth at key ports. In that context, the NPS calls for the network to expand into different areas and regions where there is high opportunity for modal shift, and recognises both the need for, and challenges in delivery of, SRFIs serving London and the south-east of England.

5.20 Government policy establishes that there is a need for SRFIs. The NPS provides a clear context of need for more SRFIs located "*near the markets they serve….and linked to key supply chain routes*" (NPS paragraph 3.103). It explicitly seeks to expand the network of SRFI's across the Regions and in particular into areas not currently well served by SRFI's.

5.21 As referred to in more detail below, although the NPS is silent on specifically where SRFIs should be located (in that it does not identify sites), by tying SRFIs to both national transport infrastructure and access to markets in practice there are relatively limited locations that would meet the relevant tests and be suitable to accommodate an SRFI.

5.22 The proposals would clearly expand the network of SRFIs. OxSRFI would introduce an SRFI into the M40 corridor and would directly respond to the challenge identified in the NPS in helping meet the need for additional provision in the south-east of England, and to serve London. Furthermore, the Proposed Development would deliver significant improvements to the performance of key junctions on the M40 (and A43 trunk road) through investment in the SRN as part of the package of highways works.

5.23 The market context for the OxSRFI is set out in the submitted 'Market Analysis Report' (Document 7.1) and reinforced through the Supporting Statement prepared by GBRf (Document 7.2B~~)~~). The Market Analysis Report considers the strategic national and regional, as well as local market context, and provides clear and compelling evidence of need both for the rail terminal and the proposed rail served warehousing. The Report concludes that:

- There are growing market demand pressures for, and interest in, rail freight, with key drivers including supply chain efficiency and

[66] Paragraphs 2.2 and 3.64 of the NPS, DfT, 2024.

resilience, cost savings, sustainability (including the 'low carbon' and 'net zero' agendas), legislative pressures, and overall value considerations.

- A significant factor in the relatively limited use of rail freight is simply the lack of access to strategic rail freight interchanges.
- Demand for SRFIs derives from multiple economic sectors, including manufacturing, automotive and construction, retail and fast-moving consumer goods.
- That OxSRFI is strategically placed to serve both the south-east and Midlands regions, it would expand the network of SRFI's and fill a clear current 'gap' in the network in Oxfordshire and along the M40 corridor – a crucial, arterial route for logistics.
- There is sustained and growing demand nationally and regionally, and an under-supply of readily available strategic sites, particularly fo larger warehouse buildings (46,450 sq.m. and above). The local and M40 market is similarly underserved.
- OxSRFI will meet existing and future market requirements for access to rail freight which will otherwise remain road based in this area.

5.24 The Report confirms the opportunity presented by OxSRFI to address the shortfall in supply of strategic distribution and logistics sites, and to ensure a proportion of the market need is located on a rail connected site. By enabling a proportion of the market need for strategic warehousing on a rail connected site the OxSRFI scheme would deliver additional benefits over road-based sites by providing opportunities to shift freight movements from road to rail.

5.25 The Market Analysis Report explains that in recent history rail has played a relatively limited role in the logistics sector, with operators focusing on road-based movement. It states that rail will become more economic and more accessible, as its market grows, but that a very significant factor in the limited use of rail, is simply the lack of access to rail due to a lack of strategic rail freight interchanges. The NPS is explicit in encouraging SRFIs in 'new' locations, and in areas where there is currently "*lesser provision*"[67].

5.26 Therefore, the 'need' identified by the NPS for more SRFIs is reinforced by the findings set out in the Market Analysis Report and GBRf's Supporting

[67] NPS references to 'expanding the network' into new areas or regions, and 'lesser' served areas, include at paragraphs: 3.89; 3.100 – 3.101; 3.106.

Statement. As confirmed by the NPS, and supported by the Market ~~Analyis~~Analysis Report, the need for more SRFIs is a response to a range of economic and environmental issues.

5.27 The principle of delivering additional SRFI's is clearly and explicitly supported by national policy: OxSRFI is being proposed as one part of the response to this need, and as shown in the following sections accords in full with the relevant components of the NPS.

5.28 The evidence of market need and demand for the proposed rail freight interchange is reinforced as a result of the involvement and commitment to the scheme being shown by GB Railfreight ('GBRf') GBRf is the 2nd largest rail freight operator in the UK, and intends to operate the OxSRFI rail terminal if consented. Their statement confirms their position with regard to the commercial and market attractiveness of the site with regard to access to key rail freight and supply chain routes and prospective customers.

5.29 Further evidence regarding the need for additional strategic logistics land and floorspace has been produced by the local planning authority (Cherwell District Council) to inform decisions on local planning applications and the emerging new Local Plan. In addition to the gathered evidence through market analysis and policy preparation, the scale and number of 'speculative' applications for distribution warehousing around Junction 10 (and around Junctions 9 and 11) of the M40 illustrates the strength of market interest in this part of the M40 corridor. Such planning applications by Albion Land and Tritax were recently (in January 2026) refused consent by Cherwell District Council for site-specific environmental reasons in both cases, but the LPA's reasons for refusal did not refer to concerns or objections regarding market need.

Locational and functional requirements of SRFIs

5.30 As set out in Section 4 of this Statement, the NPS sets out a range of physical, functional and operational requirements with which SRFI should accord, together with a set of environmental measures against which proposals must be tested. The OxSRFI proposals meet, and indeed in many cases, exceed the requirement of the NPS for SRFIs.

5.31 However, the NPS does not identify specific sites or locations for SRFI's, anticipating that the identification, promotion and delivery of SRFI's will be market led. It does however identify locational and functional requirements or criteria which new SRFI's should meet. The NPS requires SRFI's to have good connectivity to both the road and rail network, in particular the Strategic

Freight Network, and recognises that the number of locations suitable for SRFI's will be limited.

5.32 While not identifying specific sites, by being 'market led' and by identifying general locational characteristics geared around access to both strategic infrastructure and key markets, there are limited locations within the UK where SRFI's will be both capable of meeting the necessary criteria and be economically viable. The OxSRFI proposals provide excellent access to both the strategic road and rail network, and its location also allows it to meet the needs of logistics operations requiring access to urban centres across the UK including London. It is also capable of meeting all of the SRFI requirements set out in the NPS as described in the Compliance Statement at Appendix 2.

5.33 As referred to above the NPS includes a number of specific rail requirements for SRFIs, relating to the functional capacity of the terminal and the suitability of the rail route. The Rail Report (Document 7.2A) supplemented by the two reports prepared by GBRf, the Supporting Statement (Document 7.2B) and the Capacity Report (Document 7.2C) explain the suitability of OxSRFI as a location for a new SRFI and the suitability of the terminal design and its capacity. This includes confirmation that the route can be enhanced to W8 gauge and that this is (in accordance with the requirements of the NPS) a suitable gauge clearance. The Reports also explain the work that has been undertaken to assess available freight paths to demonstrate that the OxSRFI is capable of handling at least four trains a day. The work undertaken confirms that suitable paths are available to achieve the minimum required by the NPS, and indeed explains that further paths are likely to be identified once the terminal becomes operational, recognising that rail timetables and capacity are not static, and capacity and pathing will inevitably evolve over time. These Reports explain the ways in which the terminal has been designed both to deliver a flexible and high-capacity terminal, meeting all the requirements of the NPS but also working with Network Rail to ensure its functional and operational requirements are met. A Position Statement has previously been agreed (with a Statement of Common Ground awaiting signatures at the time of submission) between the Applicant and Network Rail and a Statement of Common Ground is very well progressed.

5.34 The requirements of the NPS (summarised in paragraph 4.28 of this Statement) are delivered by OxSRFI in terms of the physical and functional characteristics required for an SRFI – in summary terms:

- It provides excellent access to both the strategic road and rail network, both key criteria for SRFIs.
- The site exceeds the minimum size of 60ha defined by the Planning Act).
- The proposed terminal is capable of handling 775m trains, and can handle a minimum of 4 trains a day and with scope for expansion (ultimate rail capacity is expected to be up to 12 trains per day).
- The terminal arrangements will minimise shunting and provide the opportunity for some units to be directly rail connected.
- it is on a route capable of clearance to W8, as required by the NPS, and can provide access for trains from either direction;
- the terminal can be developed from the outset with significant capacity including for the receipt, parking and management of Heavy Goods Vehicles and associated driver welfare facilities.
- The site can provide large and flexible development plots to accommodate the varied needs of businesses capable now or in the future of supporting their commercial activities by rail.
- the site is in a location to address market requirements and expand the network of SRFI's and provides greater access to, and opportunity for growth of, rail freight services.

5.35 As referred to earlier in this Section, the appended NPS Compliance Tracker also helps demonstrate compliance with detailed requirements of the NPS.

5.36 As referred to above in the context of wider market issues, the site allows for large format warehousing to be provided to meet market needs, a proportion of which can be directly rail connected if required by occupiers.

5.37 The rail and road infrastructure proposed is significant with a commitment to delivery proposed to be secured through suitable DCO Requirements. This includes delivery of the rail terminal, the new road access to the site, and the wider package of highways improvements including to Junctions 9 and 10 of the M40. Key elements of the highways package will be in place prior to first occupation of any building.

5.38 Paragraphs 5.10 to 5.14 of this Statement explain that the OxSRFI Main site has a particular context (and indeed an evolving one) which means the impact of change can be contained, managed and controlled and where through scheme design and mitigation, the environmental effects of the scheme can be very successfully mitigated. The context around the Main site has and continues to evolve as new development takes place. There are significant

planned and proposed development, which will transform the area in the coming years. Details of these planned and committed schemes are shown on the Wider context Plan, attached to this Statement at Appendix One.

5.39 Because of this context, the topography of the area and the approach to scheme layout, including the incorporation of significant landscape bunds as a fundamental component of the scheme, the environmental effects of the scheme can be appropriately managed and its impact on local communities minimised.

5.40 Therefore, the OxSRFI proposals are considered to directly and fully accord with the locational and functional requirements defined in the NPS, and the site is suitable and deliverable as an SRFI. As demonstrated in the remaining sub-sections below, in the context of the relevant issues and impacts, and other requirements, identified in the NPS, the site can accommodate an SRFI in a manner which delivers appropriate mitigation to minimise or avoid significant adverse impacts.

Criteria for good design for national network infrastructure (Section 4 of the NPS)

5.41 Section 4 of the NPS sets out the criteria for good design of national networks infrastructure. It highlights the importance of good design and the application of the mitigation hierarchy and states clearly that scheme design will be a material consideration in decision making.

5.42 From the outset good design principles have been applied to the OxSRFI project, including informing site identification. A series of Design Approach Documents (DAD's, Document series 5.5) have been prepared which explain the approach to the identification and design of the OxSRFI. They incorporate detailed design codes which will inform and control the future detailed design of the scheme. The DAD's explain how the physical form of the Main site and its current and evolving context provide a sound basis within which an SRFI can be designed and developed. Paragraphs 5.10 – 5.14 of this Statement rehearse some of these key contextual features and how they provide the basis for well-designed national infrastructure.

5.43 The Main DAD (Document 5.5A) explains how initial design concepts for the OxSRFI were developed, responding to the opportunities and constraints identified at the start of the scheme assessment process, and to ensure the scheme represents 'sustainable development'. It explains how, from these schematic layouts, the design of the scheme has evolved taking account of

assessment work and a changing context, to establish the parameters for development at the Main site. This included identifying the site's overall potential and capacity for development, and establishing the suitable extent of development. It explains that a key part of the initial design approach was to develop a strategy to respond to existing topography, utilising cut and fill of materials across the site to form large plateau areas for built development as well as areas of raised landscape mounds which would provide visual and acoustic screening.

5.44 From this initial work the DAD explains how the scheme has evolved following a lengthy process of design, assessment, consultation and scheme refinement. It shows how the parameters for the main site have changed in response to issues and opportunities, the reasons for these changes and how they have maximised design outcomes. The DADs explain how the design of the scheme has responded to the environmental assessment work and how it seeks to achieve the appropriate balance between delivering essential national infrastructure in a way which minimises adverse impacts and contributes where possible to the conservation of the natural, built and historic environment.

5.45 The Central Hub DAD (Document 5.5B) sets out the approach to retention and reuse of the Listed Threshing Barn and associated farm house and buildings. The Application includes full detailed design for the restoration of the Threshing Barn together with commitments to the re-use and landscaping of other existing buildings and the surrounding 'Central Hub' area. As well as the benefits of this approach in terms of the protection and enhancement of heritage assets (see other sections of this Statement), this approach will also help create a sense of place and community at the Proposed Development, with communal uses and spaces and key management functions.

5.46 The Highway Works DAD (Document 5.5C) sets out the approach to the design of the Highway works, outlining how the need for each component has been derived and how the route and form of each element has been determined following a process of technical assessment and engagement, community consultation and how they have been informed by place making principles.

5.47 The overarching vision for the OxSRFI is to establish a successful Strategic Rail Freight Interchange, meeting the demands of the market and facilitating investment, job creation and economic growth alongside greater use of rail in the supply chain. The commercial components of the scheme will be positioned within an extensively landscaped site, with their effects on the environment and local communities minimised and appropriately mitigated.

The scheme will deliver access to significant green infrastructure and notable improvements in biodiversity. The quality of the landscaping, building and infrastructure design will create a sense of place appropriate for its setting and a commercial scheme of national significance. The approach to the design of the Proposed Development is entirely consistent with the NPS and other relevant design guidance. It is responsive to local landform and topography and sensitive to existing local features both within the Main site and adjacent to the Proposed Development. The Main site has been selected in part because of the containment provided by its beneficial landform, and its evolving context, which enables large scale buildings and infrastructure to be developed in a form which enables the effects to be managed and mitigated appropriately. The residual design outcomes are therefore environmentally sensitive with regard to visual and landscape impacts and will deliver high quality and much needed national infrastructure within a well-designed and distinctive place.

5.48 Consideration of masterplanning as well as commercial issues, were directly relevant to decisions taken by the Applicant regarding the approach to the existing IVC green waste facility (IVCF). It was determined that the current location of the IVCF did not work from the perspective of comprehensive masterplanning and design of the Main Site. The Applicant assessed whether the IVCF could be relocated within the Main Site, and this process included dialogue with the operator of the IVC. A relocation of the IVCF to the south western part of the Main Site was explored and this formed part of the masterplan – see Section 3 of the Main DAD. An assessment was then undertaken to advise on the potential amenity impacts on existing and proposed receptors that could occur from a relocated of the IVCF. This assessment and the resulting advice is set out in the IVCF Odour Assessment attached to this Statement at Appendix 4. The work undertaken included an assessment of the effects of the current facility to inform a judgement on the effects that would likely arise from a relocated facility. The assessment concluded that relocating the existing IVCF within the Main Site is unlikely to prevent future occupiers of the Proposed Development from experiencing strong and offensive odours on a regular basis. In light of this advice the Applicant determined that retaining the IVCF within the Main Site (even in a relocated position) would be commercially unacceptable, with risks to the quality of the environment created for future occupiers and employees. Given this judgement the decision was taken that the current IVCF lease would not be extended if OxSRFI is approved.

Assessment against NPS 'General Considerations' and 'Generic Impacts'

5.49 This section is structured with reference to the relevant broad headings based on Section 5 of the NPS (and with reference to the general considerations of Section 4 of the NPS), with cross-references to the relevant application documents and material considerations, where appropriate. In general terms, this appraisal considers overall policy compliance, with due regard to the role of, and need for, the works proposed. As referred to above, it also considers relevant 'design' and other general issues identified in the NPS.

5.50 Section 4 of the NPS refers to the need for the 'Environmental Assessment' process to consider cumulative effects, this being the potential effects of the Proposed Development in combination with other existing and "*committed*" developments. Cumulative assessment is in intrinsic part of the ES (Document series 6), with overall conclusions drawn out in ES Chapter 16. A summary of the key conclusions regarding cumulative effects are set out later in this Section of the Planning Statement.

Air Quality

5.51 Chapter 4 of the ES (Document 6.4) considers Air Quality issues, as well as Odour issues. This considers both (temporary) effects during construction, and in the longer-term with the proposed development in place.

5.52 The scheme is not located within an Air Quality Management Area (AQMA), and would have no notable or adverse impacts on any designated AQMA. The baseline air quality conditions are shown to be generally very good.

5.53 Construction effects can be effectively mitigated through standard CEMP measures, and minimised to negligible levels. Likely residual air quality effects overall are assessed as negligible, including with regard to the effects of the likely changes in local transport and road infrastructure once the scheme is fully operational. Some localised improvements in air quality are identified largely as a result of improvements to the highway networks which would reduce congestion and through-traffic in many nearby communities, including Ardley and Middleton Stoney. The assessment also considers the proposed changes to future (from 2040) air quality environmental targets relating to $PM_{2.5}$, and with Travel Plan measures taken into account this change to more stringent targets would result in up to minor adverse (and not significant) effects on human receptors.

5.54 Overall, the Proposed Development is considered to cause a 'minor adverse' effect, at worst. The Proposed Development's Framework Travel Plan will assist in reducing the change in concentrations at sensitive receptor locations. At the strategic level there would be wider benefits associated with the reduction in HGV mileage on the highway network as a whole.

5.55 Having regards to paragraph 5.9 of the NPS, the ES concludes that the project would not affect the UK's ability to comply with the Air Quality Directive, as the scheme will have mostly negligible effects, and some beneficial effects across a wide area, including many AQMA's. It is concluded that the scheme will not affect the ability of the South East 'non-agglomeration zone' to become compliant under the Air Quality Directive, nor will it delay compliance.

5.56 ~~The proposals therefore~~ES Chapter 6 (Ecology & Arboriculture) with cross-reference to ES Chapter 4 (Air Quality & Odour) identifies some likely residual very small increases in Nitrogen deposition and Acid deposition relative to existing background levels in the Ardley Cutting & Quarry SSSI during the construction phase. The assessment concludes that the impact of the effect on the SSSI will be temporary, neutral to not significant adverse and will not impact the conservation status of the site. For completeness, no significant construction effect is anticipated on the Ardley Cutting and Quarry SSSI as a result of NO_x and NH_3, and potential impacts from these air pollutants are considered neutral[68]. The ES (Table 6.11) considers a range of other nearby designated sites, and confirms that any construction impacts to all other relevant sites as a result of air quality will be neutral to not significant adverse.

5.57 The likely effects during the operational phase are similarly identified as being not significant but adverse with regard to a number of air borne pollutants, with minor short-term changes with regard to NO_x which will have a neutral long-term effect, and adverse but not significant increased concentrations of NH_3 and Nitrogen affecting localised parts of the SSSI, and low increases in concentrations in Acid (assessed as low magnitude and not significant). Considered within the context of the majority of the SSSI not comprising qualifying calcareous grassland habitat, and likely buffering effects, the Proposed Development is not considered likely to result in a significant change to the sensitive grassland for which the SSSI is notified, or to undermine the biodiversity objectives of the site.

[68] ES Chapter 6 paragraph 6.5.55.

5.58 The NPS (at paragraph 5.61)[69] contains a presumption against projects likely to have an adverse effect on SSSIs unless the benefits of the scheme "clearly outweigh" the impacts. The likely low and/or localised and not significant adverse impacts arising as a result of elevated levels of airborne pollutants, such as minor alterations to habitat species composition, condition, or extent, will be compensated via the creation of extensive calcareous grassland and lowland meadow in close proximity to the SSSI that will be subject to long-term monitoring and appropriate management, as detailed within the Habitat Management and Monitoring Plan ES Appendix 6.11 (Document 6.6K), and secured as part of the embedded mitigation. Additional assessment of wider ecological issues is set out below in this Section of the Planning Statement, and Section 6 of this Planning Statement addresses the overall planning balance.

~~5.56~~5.59 In light of the above, and with regard to the above and the 'planning balance' set out in Section 6 of this Statement, the proposals fully accord with the 'tests' set out by the NPS regarding air quality, and with relevant local policies regarding 'pollution' and local environmental quality. Also see below regarding 'dust', and 'odour', which are relevant to the air quality assessment but dealt with separately in the NPS.

Commented [BH1]: ?

Greenhouse Gas (GHG) emissions

~~5.57~~5.60 An assessment of GHG forms part of the ES[70] as required by the NPS, and in accordance with regulations and best practice regarding EIA for major schemes.

~~5.58~~5.61 The NPS makes it clear that SRFIs have a direct and significant role to play in reducing carbon emissions by enabling the shift of freight from road to rail. As referred to earlier in this Statement, the NPS is clear about the benefits in terms of reduced road congestion, and reduced carbon dioxide (and other) emissions, as a result of removing HGV mileage from the national road network and transferring these movement onto rail. However, while seeking to reduce carbon emissions associated with both the construction and operation of national networks, NPS policy also recognises that there will inevitably be operational carbon emissions from national infrastructure, and

[69] The NPPF (2026) at Policy N6 (b) provides a broadly consistent policy approach.
[70] ES Chapter 15 'Climate Change' (Document 6.15) - GHG specifically forms the focus of ES Appendix 15.2 (Document 6.15B).

that "*this is not, of itself, reason to prohibit the consenting of national network projects*" (NPS paragraph 5.41).

~~5.59~~5.62 The submitted OxSRFI GHG assessment takes account of both embedded measures, including for construction and operational phases, which will ensure carbon efficiency and reduction against standard benchmarks. This includes provision of on-site green and blue infrastructure, as well as on-site renewable energy generation through roof-mounted PV. The proposals are 'future-proofed' in design to accommodate more PV if occupiers require it, and if the wider 'grid' is able to accommodate feed-in energy at scale. The proposed development also includes additional measures proposed, including Travel Plan measures, which will support use of lower carbon public transport (as opposed to private cars), and walking and cycling ('active travel'). The assessment identifies the saved (or avoided) emissions as a result of the mode shift from road to rail freight.

~~5.60~~5.63 As required by the NPS, consideration in scheme design has also been given to climate change resilience and adaptation, with a key example being the use of sustainable drainage (SuDS) designed explicitly with regard to the likely effects of climate change.

~~5.61~~5.64 Sustainable construction methods and products are to be deployed where feasible, and the Applicant has committed to a challenging target for carbon emissions intensity during construction (350kgCO2/m2 for all buildings). The proposals will deliver a minimum of BREEAM 'Excellent' standard buildings which will ensure a rigorous approach to energy efficiency, and wider sustainability considerations during both construction and operation of the buildings (and which exceeds the requirements of Local Plan Policy ESD3).

~~5.62~~5.65 This also accords with local planning policies which similarly require development to seek to deliver sustainable development and incorporate sustainable construction (policy ESD3) and low carbon design, including renewable and 'decentralised' energy systems (such as policies ESD2 and ESD4). Policies in the emerging new local plan are looking to go further, updated to reflect current national policies including enabling the national shift to net zero (draft policy CSD3) through reducing embodied carbon in new development (CSD5).

~~5.63~~5.66 The residual impacts of OxSRFI on climate change (contextualised with regard to UK 'carbon budgets' set by Government) are shown to be minor and not significant. With the rail terminal proposed for early delivery the Proposed

Development will enable realisation of carbon emission reduction benefits from early in its operational life. The proposal to ensure – secured by the DCO – that the terminal is in place and operational prior to the occupation of 2.5 million sq.ft. (232,257 sq.m) of warehouse floor space accords with the NPS which recognises the potential need to occupy sites before all rail infrastructure is fully commissioned or connected to the wider network (NPS paragraph 4.88).

~~5.64~~5.67 The OxSRFI proposals accord with the NPS with regard to GHG and climate change adaptation, as well as with existing and emerging local planning policies on this topic.

Biodiversity and nature conservation

~~5.65~~5.68 The ES[71] provides a thorough assessment of the likely impacts on Ecological features and assets. The assessment was informed by a full range of appropriate surveys held across multiple years to ensure a comprehensive understanding of the application site's existing (baseline) characteristics and to inform appropriate mitigation features as part of an assessment of the likely impacts of the proposed development.

~~5.66~~5.69 Delivering a Biodiversity Net Gain (BNG) is currently not a mandatory requirement for the scheme, but the submitted evidence and assessments conclude that OxSRFI will deliver a 10%+net gain in biodiversity across the Application site.

~~5.67~~5.70 The NPS places an emphasis on the importance of minimising harm to designated ecological sites or features, and on the importance of mitigation and compensation to address harm to existing natural assets or to replace lost habitats. The majority of the proposed application site is of low intrinsic ecological interest or value as a largely arable agricultural habitat. However, the OxSRFI proposals seek to retain key landscape and habitat features where possible, including habitats around the existing watercourse around the centre of the site, and other tree groups and hedges. Some loss of trees and hedges is proposed but there are substantial areas of new tree and other planting proposed across the site which more than replaces that proposed to be lost. Some of the overall headlines in terms of habitat change include:

[71] ES Chapter 6 Ecology ~~and~~including Arboriculture (Document 6.6).

- Over 60ha of new broadleaved woodland is proposed[72], with 13.7ha (around 60%) of the existing woodland retained and enhanced on the Application Site – this significant off-sets the proposed loss of approximately 7.1ha of broadleaved woodland, and 1ha of lowland deciduous woodland. ~~No veteran trees, or trees with Local Wildlife Site status are to be removed.~~
- ~~13.9km~~14.1km of new species rich hedgerow (over 4.1km of which will include standard trees). Some sections of existing hedgerow are proposed to be translocated within the site, including suitable sections from the 260m in total of 'important' hedgerow~~.~~ affected by the proposals. This new and translocated provision off-sets the approx. 11.~~3km~~7km of hedgerow to be removed and results in a positive (beneficial) effect overall[73].
- A net gain in the length of watercourse habitats within the Application Site, with enhancement to around 1.~~5km~~3km of retained watercourse, and an increase of over 50% in terms of open channel length;
- A substantial increase in lowland meadow with over 15ha of new provision compared with the loss of 0.06ha;
- A substantial increase in calcareous grassland (with over ~~23ha~~15ha of new provision) to compensate for the loss of 0.49ha associated with the SSSI. This results in a significant beneficial effect given the national significance of this 'receptor'.~~6~~[74]

5.71 While retention and conservation of existing woodland is proposed to help minimise or avoid significant or other adverse impacts, some losses are inevitable, as set out in ES Chapter 6. This includes the loss of a single veteran tree (as defined by the NPS), as well as a further 27 trees which meet the lower threshold of 'irreplaceable habitat' as defined in the Biodiversity Net Gain Regulations 2024 (see ES Chapter 6, Section 6.5 for further details). The NPS (at paragraphs 5.62-5.63) resists the loss of such trees and habitats, with a presumption against development which would result in a loss of a veteran tree or ancient woodland "*unless there are wholly exceptional reasons (for example, where the public benefit would clearly outweigh the loss or deterioration of habitat) and a suitable compensation strategy exists.*" (NPS paragraph 5.63). As set out in the ES Chapter, the economic and strategic significance of the Proposed Development is considered to outweigh the loss

[72] 54.28ha other broadleaved woodland and 5.9ha lowland mixed deciduous (from ES Chapter 6, Table 6.~~12~~13 and Section 6.5~~.~~)
[73] ES Chapter 6, Section 6.5, Table 6.13 and associated text. Also see the 'Air Quality' sub-section above.
[74] ES Chapter 6 Ecology including Arboriculture (Document 6.6), Table 6.13 and associated text.

Formatted: Font: 9 pt
Formatted: Font: 9 pt
Formatted: Font: 9 pt
Formatted: Font: 9 pt
Formatted: Font: 9 pt
Formatted: Font: 9 pt

of the single veteran tree, and the BNG habitats identified, and the compensation strategy proposed would result in neutral effects overall[75].

~~5.68~~5.72 The assessment and conclusions as contained in the ES and associated technical appendices shows the overall likely effects of the Proposed Development include a number of beneficial effects on habitats and species considered important at a County scale (or nationally, as referred to above). Mitigation measures respond directly to the presence or potential presence of species including badger, bats, great crested newts, and various bird species, with habitats proposed or retained to avoid or reduce likely effects. Mitigation included ranges from the inclusion of bat and bird nesting boxes, to ensuring bridge (or culvert) design is suitable for bat foraging along retained waterways and corridors.

~~5.69~~5.73 Habitat provision and connectivity will be provided as a result of the additional tree and hedgerow planting (which as shown above more than compensates for those lost to construction) within the Main Site and highway works corridors.

~~5.70~~5.74 The application includes a Habitat Monitoring and Management Plan (HMMP) compliance with which is secured by a DCO requirement, and which sets out a range of measures to secure the proposed long-term gains in biodiversity across the site, including with regard to veteran trees.

~~5.71~~5.75 The residual adverse impacts will be reduced to minor or negligible levels on nearby off-site designated sites including sites with a statutory national nature conservation area designation. Indeed, in the case of the Ardley Cutting and Quarry SSSI, neutral to not significant beneficial effects are considered likely~~.~~ overall, albeit as discussed above, some low magnitude and not significant effects from some changes to concentrations of airborne pollution are likely. This potential adverse effect forms part of the overall planning balance in Section 6.

~~5.72~~5.76 Through a clear gain in biodiversity overall, and through seeking to minimise the losses of existing habitats, the proposals accord with the requirements of the NPS. The proposals also accord with local adopted Planning Policies (such as ESD 10 and ESD11).

Resource and Waste management

[75] Table 6.15 of ES Chapter 6 identifies overall residual effects, including on veteran trees.

~~5.73~~5.77 The ES considers resource and waste issues as part of Chapter 13 (Document 6.13), focused both on issues associated with the use of materials (including minerals and other materials), and the management of waste during both construction (including demolition), and operational phases of the Proposed Development. In simple terms, given the nature of the Proposed Development, the materials issues are more pertinent to the construction phase only, with waste management being relevant to both construction and operational phases.

~~5.74~~5.78 There is a significant extent of regulation and legal requirements relating to both the use of materials and the management of waste, including requirements to apply the 'waste hierarchy' to avoid waste and maximise recycling generally, and including measures to enable and encourage recycling through separation of waste in new developments once complete and operational. The NPS policy on resource and waste management is rooted in accordance with the principles of the waste hierarchy and progressing towards a more circular economy[76].

~~5.75~~5.79 The OxSRFI scheme will minimise waste, with a range of measures which accord with regulations, and with associated best practice to deliver safe and effective waste management. For the construction phase these are set out in the CEMP, and associated Site Waste Management Plan to be prepared in due course, secured through the proposed DCO. Resource efficiency elements to this topic are in part to be secured with regard to the submitted Energy Strategy and Sustainability Strategy, including with regard to the sourcing and specification of construction materials, and meeting the required standards to deliver the targeted BREEAM certification for the scheme (as part of delivering BREEAM 'Excellent' as a minimum).

Commented [SH2]: Confirm with RPS work

~~5.76~~5.80 Waste generation once operational will be relatively low given the proposed uses, but as required by the NPS, safe and effective management of waste will be implemented through design and management features to enable high recycling rates in accordance with (or exceeding) targets relating to diverting waste from landfill. For example, detailed building design – which does not form part of the Proposed Development at this stage - will be required to include appropriate waste separation and storage to maximise recycling.

~~5.77~~5.81 Based on the analysis and assessment contained in the ES (Chapters 11 and 13), there is some potential harm with regard to policies of the OCC Minerals and Waste Core Strategy (2017). The site is located in a Minerals

[76] Paragraph 5.70, NPS, Dept for Transport March 2024.

Safeguarding Area, and is known to contain limestone resources. Any harm caused would be in part mitigated by a proportion of that resource being exploited and used on-site as part of the construction process, reducing the need to bring on limestone resource from off-site and reducing pressure on existing supply-chains from current quarries. However, the majority of that resource will remain in situ on-site and will not be exploited prior to development. Also see the 'land-use' section below.

~~5.78~~5.82 Similarly, the proposed loss of the existing IVC green waste composting facility when the current lease ends in 2030 – an allocated and safeguarded site within the Waste Core Strategy – creates some potential harm. Specifically, Policy W11 of the OCC Minerals and Waste Core Strategy seeks to safeguard allocated waste facilities, including this IVC. Again, the Applicant's assessment demonstrates that there is sufficient capacity (and headroom) to process green waste at other sites within Oxfordshire without the Ardley IVC, and therefore there is minimal if any harm caused to the ability to deliver the Waste Plan's objectives and targets.

Commented [SH3]: CONFIRM CORRECT - within Oxfordshire, not wider provision relied upon?

~~5.79~~5.83 This harm, and that relating to mineral safeguarding, is considered in Section 6 of this Statement as part of the judgements about overall 'planning balance'. However, the approach taken accords with the policies of the NPS overall which require efforts to be made to minimise any adverse effects, but is drafted in such a way as to recognise some adverse impacts may sometimes be unavoidable.

Dust, Odour and Light

~~5.80~~5.84 The NPS requires applicants to "*consider*"[77] the potential for impacts relating to dust, odour, and artificial light (as well as smoke and steam which are not relevant to the proposed development), and recognises that while "*some impact for local communities is likely to be unavoidable*", impacts should be "*kept to a minimum and should be at a level that is acceptable*." (NPS paragraph 5.119).

~~5.81~~5.85 The ES considers these issues in full in ES Chapters 4 and 8 respectively[78]. Odour forms part of the assessment given the presence of parts of a former landfill site within the Order Limits and in which works will be required, including the reprofiling of former waste material within the site as

[77] Paragraph 5.118 of the NPS (DfT, 2024)
[78] (Documents 6.4 and 6.8). Dust issues forms the specific focus of ES Appendix 4.3 (Document 6.4C).

part of the construction process. Beyond the ES assessment of likely effects of the Proposed Development, odour issues have also been relevant to masterplanning and design considerations associated with the existing green waste composting facility (IVCF). Paragraph 5.48 above sets out details of the conclusions reached having regard to the advice received in the IVCF Odour Assessment (see Appendix 4).

~~5.82~~5.86 Given the nature of the proposed development, issues associated with dust are primarily a construction issue, and the assessment identifies that given the scale of the site and construction works there is a potential for significant effects without appropriate mitigation. A range of mitigation measures are proposed in the ES, secured through DCO Requirements associated with the submitted Construction Environmental Management Plan (CEMP – ES Appendix 2.3, Document 6.2C), and through future phase specific CEMPs (P-CEMPs) required for each relevant phase of construction activity.

~~5.83~~5.87 Similarly, mitigation measures during the construction process are identified to minimise the likelihood of significant (temporary) effects from odour from exposed waste material as part of the construction process. These measures include phasing the works to focus on appropriately sized (relatively small) areas of the landfill at any one time, and measures including daily covering of material overnight. An outline Odour Management Plan forms part of the submission (ES Appendix 4.6) to identify additional mitigation measures ahead of agreement of the detailed design of the landfill works (post-consent) under the waste permitting regime with the Environment Agency. The DCO will secure such measures through the discharge of Requirements process.

~~5.84~~5.88 With the proposed mitigation in place, the ES identifies no likely residual significant effects associated with dust or odour during the construction process.

~~5.85~~5.89 The Lighting assessment (ES Chapter 8) makes worst-case, but realistic assumptions about the location, number and specification of lighting sources. The strategy is to deliver a minimally obtrusive approach to the lighting, ensuring it considers the sensitivity of nearby human, environmental and ecological receptors, in accordance with relevant British Standards and Institution of Lighting Professionals (ILP) guidance. Not all sections of new highway are required to be lit, but where lighting is necessary (primarily around junctions), this is designed to meet the requirements and standards of National Highways and Oxfordshire County Council.

~~5.86~~5.90 On the Main Site the approach reflects the fact that the final layout and number of warehouse buildings is not known or fixed at this stage. The lighting strategy (at ES Appendix 8.1, Document 6.8A) incorporates best practice measures and features including directional lighting and dimming and other controls to limit unnecessary illumination. The submitted Lighting Strategy provides details of the proposed lighting equipment and specifications to inform future building or plot specific details in due course.

~~5.87~~5.91 The assessment includes defined/recommended maximum light levels with regard to sensitive receptors on and off-site and the strategy will ensure a defined, minimal level of light around site boundaries to limit impacts. The assessment confirms that post-development the site would remain in the same lighting 'environmental zone' classification (E2) as it is currently under baseline conditions. The assessment identifies no significant effects on any human (visual) or ecological receptors, with a small number of receptors potentially experiencing moderate effects. and the vast majority of receptors likely to experience negligible or minor effects only.

~~5.88~~5.92 As referred to above, dust, odour and lighting impacts will be effectively and appropriately mitigated during construction through a range of measures identified in the CEMP, and in future p-CEMPs. Once operational, the assessment identifies no significant effects on nearby receptors, with likely residual effects limited to localised increases in 'sky-glow' but includes no obtrusive lighting effects on any receptors. Therefore, the proposals are consistent with the requirements of the NPS with regard to these issues, as well as with relevant local plan policies, including ESD3, and local plan objectives to minimise 'pollution' in general.

Flood Risk

~~5.89~~5.93 The application site interacts with a number of potential sources of flood-risk in the form of features such as the Gagle Brook and Padbury Brook. The majority of the Proposed Development is located within the Gagle Brook catchment. Beyond the limits of the Main Site, the area crossed by the proposed J10 Highway Improvement Works comprises the Padbury Brook catchment.

~~5.90~~5.94 Environment Agency Flood Map for Planning shows the majority of the Main Site lies within Flood Zone 1 (lowest probability of flooding), with only small areas of Flood Zone 2 and 3 (medium and high probability of flooding) associated with Ashgrove Brook downstream of Camp Road. The M40 Junction 10 Highways Improvement Works crosses through areas of Flood Zone 2 and 3 associated with the Padbury Brook. The mapping identifies the Main Site to be predominantly at a very low probability of flooding from surface water, with some areas of higher risk associated with the Ashgrove Brook. Being primarily in the lowest category of risk, the site's characteristics accord with the principle established through the NPS and ither policies (including the NPPF) to avoid development in areas of highest risk of flooding.

~~5.91~~5.95 The Applicant held pre-application technical dialogue with both the Environment Agency (EA), and lead local flood authority (OCC), as well as with the local planning authority, with the former undertaking a review of the hydrological modelling undertaken as part of the flood-risk assessment.

~~5.92~~5.96 A range of mitigation measures form part of the proposed development to respond to the site's current characteristics and to mitigate or eliminate the potential for any adverse impacts on flood-risk both during construction and operational periods. In accordance with the NPS, this includes incorporation of sustainable drainage systems (SUDS), and consideration of the effects of climate change as part of the drainage strategy and scheme design.

~~5.93~~5.97 The various technical reports and assessments submitted as part of the application demonstrate that the Proposed Development will not result in any significant environmental effects or adverse changes to flood-risk within the site, or off-site. Indeed, some likely benefits (slight or moderate) are identified for downstream receptors in terms of reduced risk of flood-risk by reductions in the rate of surface water discharge from the site during storm events.

~~5.94~~5.98 Proposed surface water attenuation and drainage features form part of the extensive green infrastructure and landscaping proposed within the scheme, and in many cases will contribute to both biodiversity as well as amenity benefits for employees and visitors to the site. This multi-purpose approach accords fully with the NPS which encourages the use of SuDS, as well as 'nature-based solutions' to climate change adaptation and mitigation. Similarly, local planning policies (including over-arching ESD1, as well as Policies ESD6 and ESD7) seek use of SuDS as part of sustainable drainage design and flood-risk management, also with explicit reference to climate change.

~~5.95~~5.99 Also see below regarding '*water quality and resources*' which are set out separately in the NPS~~..~~.

Land contamination and instability

~~5.96~~5.100 As required by the NPS the Application considers the potential for risks associated with both contamination and land instability under the heading of 'Ground Conditions'[79]. The assessment considers the potential for impacts on a range of environmental receptors and features on- and off-site, and 'human receptors' (i.e. off-site residents and communities, and future workers based on-site), including groundwater, aquifers, and controlled waters. Potential risks to human health are explicitly part of the assessment undertaken. The ES includes consideration of 'PFAS' pollution associated with off-site historic uses on the former RAF Upper Heyford site.

~~5.97~~5.101 The site's historic and current uses mean there are few if any hazards to be taken into account in designing the development, and the assessments undertaken confirm any contamination is highly limited and focused in small areas within the site and presents only a low level of risk. DCO Requirements (and CEMP measures) provide mechanisms for investigation and remediation should unexpected contamination be identified during construction.

~~5.98~~5.102 The site's geology is suitable for development, and the assessment considers issues relating to groundwater. As required by the NPS, construction related environmental and mitigation measures are proposed in the CEMP (ES Appendix 2.3, Document 6.2C), and will be secured through phase specific P-CEMPs to mitigate or prevent any risks of future contamination or adverse impacts on the quality of groundwater. The assessment confirms that no significant environmental effects are likely. This therefore also accords with relevant local plan policies including general requirements around sustainable construction (Policy ESD3) and sustainable development overall.

Landscape and Visual Impacts

~~5.99~~5.103 As required by the NPS, a comprehensive approach has been taken to the assessment of potential landscape and visual effects of the scheme through the submitted Landscape & Visual Impact Assessment (LVIA) which

[79] ES Chapter 11 (Document 6.11).

forms the basis of ES Chapter 7. The LVIA has been undertaken in accordance with the GLVIA3 guidance, and considers construction and operational phases (in accordance with best practice and guidance, and as required by the NPS).

~~5.100~~5.104 As referred to in Section 4 of this Statement, the NPS emphasises the need for projects to be designed to avoid or mitigate visual and landscape effects "*while maintaining the operational requirements of the scheme*"[80]. The NPS is clear that some impacts may be unavoidable, but that "*reasonable mitigation*"[81] and landscape enhancement measures should be delivered where possible and appropriate. The NPS strikes a pragmatic tone, seeking balance between competing issues and reflects an awareness that some effects are inevitable, but must be minimised and weighed in the balance alongside the benefits of the scheme as a whole.

~~5.101~~5.105 The Applicant has worked hard to successfully achieve the balance between the need to avoid and mitigate likely effects with meeting the operational requirements of an SRFI. An SRFI is by necessity a relatively large-scale development which, unlike many other types of NSIP scheme, includes provision for large-scale buildings and other features including cranes as part of the rail terminal. This has the potential to increase the likelihood of some residual landscape and visual effects compared to other categories of NSIP, albeit also creates some opportunities for measures to deliver a degree of containment as compared to long, linear forms of national networks infrastructure which could have effects over a much wider number of landscape areas or features.

Commented [SH4]: Happy with this narrative? Necessary?! Helpful?

~~5.102~~5.106 Consideration of potential landscape and visual issues and effects formed an early part of site analysis and initial masterplanning with input from the LVIA consultants. The potential impacts on key receptors, and opportunities to avoid or embed measures to mitigate them formed a key part of the scheme design process stemming from analysis of the site and context. The submitted Main Site D.A.D (Document 5.5A) sets out the evolution of the proposals and how landscape and other issues helped inform the evolution of the proposed development, including scheme parameters. The final parameters, defined on the Parameters Plan (Doc 2.5) directly impose limits and constraints on the scale and disposition of built and other development, and will shape and inform detailed scheme design in due course.

[80] Paragraph 5.164 of the NPS (DfT, 2024)
[81] Paragraph 5.169 of the NPS (DfT, 2024)

~~5.103~~5.107 Following statutory consultation (in late 2025) and dialogue with key consultees, landscape and visual considerations informed further refinement of scheme parameters including reductions in the proposed maximum building heights within zone A4 of the SRFI site, and increases to the height, depth and variation of slopes of the landscaping around parts of the western boundary. These changes were a direct response to concerns raised by consultees regarding potential effects on future residents on nearby sites (including currently live, undetermined proposals at Heyford Park), and are considered a positive response by the Applicant to the NPS's requirement to seek to minimise impacts. This is a further example of the significant efforts made throughout the iterative process of design, assessment, consultation and design refinement, to ensure an appropriate and high-quality scheme which is responsive to its immediate and wider context.

Commented [BH5]: Review wording. Does this imply we wouldn't comply if we hadn't made the change?

Commented [SH6R5]: Good point - amended. Also added a reference to design.

~~5.104~~5.108 The NPS explicitly recognises the potential role for "*topographical interventions*"[82] and cites both bunds and lowered ground levels, and use of landscaping, as examples of mitigation measures to minimise effects, as well as decisions about the citing of infrastructure. The OxSRFI project incorporates these measures which in combination are considered to successfully mitigate the likely impacts on the significant majority of receptors to below significant levels in ES terms.

~~5.105~~5.109 As required by the NPS, the proposals will not result in any effects on nationally designated landscapes, nor any locally identified '*valued landscapes'*. However, not unusually for a major, nationally significant project, there are some likely residual adverse impacts on the landscape, including some likely significant effects. Some of these effects are considered most apparent on completion (start of operations) of the Proposed Development but will reduce as landscaping matures, with others likely on a permanent basis. However, the most significant landscape effects are at the localised and site level and on the immediate landscape context of the Main Site. The LVIA identifies a number of beneficial effects on the wider landscape as a consequence of the significant green infrastructure including substantial new woodland planting. The assimilation of the landscaping scheme into the wider landscape as it matures would also reduce the effects over time

~~5.106~~5.110 The likely scale and extent of residual adverse effects have been minimised, and the LVIA confirms that over the medium and longer-term (by year 15, the standard assessment horizon for LVIAs), the impacts on most

[82] Paragraph 5.166 of the NPS (DfT, 2024)

visual receptors would no greater than minor or minor/moderate adverse. The most notable visual residual effects will be on users of some rights of way (PROW) which currently run across the Main Site and will be directly changed (and integrated on diverted routes) by the development. The highways works will have up to moderate residual visual impacts on a small number of properties, for example on the eastern edge of Middleton Stoney, but the Main Site will have a negligible or minor visual effect from the village. Similarly, views of the Main Site from Ardley, and from Heyford Park will be limited in terms of the proposed built development, and with no views of operational activity in the site.

~~5.107~~5.111 As a nationally significant project the OxSRFI proposals are appropriately large-scale, and in that context some residual significant effects are considered inevitable and unavoidable. However, the relatively limited scope of likely adverse effects is noteworthy, as are the number of beneficial residual (long-term) effects, all of which is considered a direct consequence of the comprehensive approach proposed to scheme design and masterplanning.

~~5.108~~5.112 The approach taken, and the likely effects, are considered consistent with the NPS, as well as with local planning policies relating to good design (ESD15) and landscape issues (ESD13). Consideration is given to the potential for the residual significant adverse impacts in the context of the overall 'planning balance' in Section 6 of this Statement.

Land Use (including agricultural land issues)

~~5.109~~5.113 This topic as defined by the NPS is wide-ranging. It includes policy relating to the importance of green infrastructure (GI) as a way to deliver or support benefits as part of sustainable development (relating to social, environmental, and economic issues), with an expectation of minimising losses of existing trees and woodlands where possible. The NPS recognises the likely challenges of using brownfield land for NSIPs including SRFIs, and the importance of considering existing and proposed land uses near the NSIP project, including sites included in development plans. This topic of the NPS also relates to agricultural land and soils.

~~5.110~~5.114 As set out earlier in this Statement, the NPS recognises that SRFIs need large sites, and will often require countryside locations.

~~5.111~~5.115 The application site is currently under agricultural use, and the proposed development would see this use change (cease) if consented. A specific assessment of the impacts on agricultural land and soils is included in the Application[83], and shows that a very small percentage (approximately ~~9%, 30.5ha~~8%, 37.7ha) of the agricultural land is in the 'best and most versatile' quality. While this represents a significant adverse effect as defined by standard metrics[84], the assessment confirms that the soils will be protected and retained on-site and will form part of the landscaping or habitat enhancement features proposed. The loss of agricultural land will be taken into account as part of the decision-making process, as will the measures proposed to minimise the overall impacts on the soil resource[85]. Also see below.

~~5.112~~5.116 The CEMP (and future p-CEMPs) includes measures to ensure the soil resource is protected and managed appropriately during the construction process. Protected, re-used soils from within the site, including the best quality soils, will be used to support on-site landscaping and green infrastructure. In accordance with the NPS, the Proposed Development would deliver an extensive area of GI which incorporates new or diverted and enhanced rights of way and other public access into and around the Main Site, and within (along and across) highways corridors. This GI therefore delivers multiple uses and benefits, including social, health and wellbeing benefits associated with outdoor exercise and recreation, but also environmental benefits through contributing towards ecological improvements and biodiversity net gain (BNG). The scheme design and parameters would retain as many existing trees and woodland areas as possible, including a significant corridor of established trees within the Main Site which will form an important feature once the scheme is developed. These retained features form an important part of the on-site GI along with considerable new tree and woodland (and other) planting which result in a very significant net increase overall. The Application Site does not contain any veteran trees, and appropriate mitigation measures are proposed to ensure no harm is caused to a single off-site veteran tree nearby.

~~5.113~~5.117 With regard to materials and minerals issues, the Application includes provision to make use of site-won materials (limestone) known to be located on-site, reducing demands on other sources of material, and reducing the

[83] ES Chapter 14 (Document 6.14), and the associated Appendix 14.1 (Document 6.14A)
[84] Defined by Natural England – see ES Chapter 14.
[85] Paragraph 5.202, NPS 2024, DfT.

potential transport (and carbon or energy) implications of the construction process. The NPS encourages this type of approach to reduce conflict with safeguarded mineral resources. However, the site is in a Mineral Safeguarding Area (Policy M8 of the OCC Minerals and Waste Core Strategy 2017) which has a presumption against development. The mineral resources not exploited and used as part of the construction process would remain on-site including under extensive areas of landscaping and GI, something noted as appropriate forms of mitigation in the NPS. However, it is recognised that the development would essentially result in sterilisation of much of the on-site resource. While the approach accords with the NPS (the main and pre-eminent policy for the Proposed Development) there is a resulting residual conflict with Minerals and Waste Local Plan policies. This forms part of the planning balance set out in Section 6 of this Statement.

~~5.114~~5.118 The relationship with other off-site land-uses – existing and proposed – has been explicitly considered as part of wider 'design' and masterplanning. The presence of existing communities (local villages) and consented development sites yet to be developed have directly influenced the proposed layout of the scheme, its landscaping and earthworks as defined by the Parameters Plan. The ES includes consideration of the potential for environmental impacts on such receptors, including live planning applications (not currently determined) at Heyford Park and adjacent to it on sites which have been proposed since the OxSRFI was first proposed ~~publically~~publicly in 2021.

~~5.115~~5.119 As set out with regard to 'design' and environmental mitigation, the landscape and earthworks measures form a fundamental component of the scheme and are critical in ensuring that its environmental effect is acceptable and its impact on local communities minimised. The Main Site D.A.D (Document 5.5A) explains the ways in which the scheme design has responded to the context of existing development and proposed or consented (but not yet delivered) potential future development nearby. It explains that changes have been made to the scheme – including to building heights and landscaping buffer depth and height - in response to consultation and comments received by the Applicant during statutory consultation. The amended Parameters are reflected in the Landscape and Visual Assessment - also see separate topic above.

~~5.116~~5.120 The submitted LVIA includes visualisations and cross-sections which help to show the relationship between the sites (and future potential receptors) nearby. Similarly, the Noise and Lighting assessments of the ES consider the relationships with off-site receptors, including potential future receptors on

committed or other proposed sites nearby. No likely significant visual effects are identified on nearby receptors (current or future) within Heyford Park. Indeed, the various mitigation and design measures ensure significant effects are minimised overall on all nearby receptors, with significant residual effects limited to a small number of receptors.

~~5.117~~5.121 While the loss of an area of best and most versatile agricultural land cannot be avoided, the loss is mitigated as required by the NPS and the soil resource protected and re-used. The conflict with minerals safeguarding does weigh against the scheme, but is mitigated by use of site-won materials therefore making use of a not insignificant quantity of the mineral resource (as part of the 3.8 million cubic metres of material moved and re-used on-site). The site delivers an extensive range of landscaping and GI which deliver multiple benefits sitting atop areas of existing but not exploited or disturbed mineral resource. Overall, the Application is considered to accord with this element of NPS policy because harms are reduced through mitigation and the majority of the Application Site avoids the best and most versatile soils. However, as referred to above, the Proposed Development would result in some harm having regard to the policies in the OCC Minerals and Waste Core Strategy (2017), and this is considered in Section 6 where a judgement about overall 'planning balance' is set out.

Commented [BH7]: I don't think this is quite right - should it say ..result in some harm having regard to the policies in the..

Historic Environment

~~5.118~~5.122 The scheme has been assessed in the context of both built heritage and any archaeological features potentially affected by development of the site. The site is not in a designated heritage (or landscape) area, and has no other local designations or allocations, but does contain a Grade II listed building (Threshing Barn) within the existing Ashgrove Farm complex of buildings.

~~5.119~~5.123 The NPS requires schemes to consider both the direct impacts on any heritage assets, as well as wider impacts on the setting of any assets (or historic landscape), and encourages '*sustaining or enhancing*' heritage assets as a desirable element of NSIP schemes, and gives "*great weight*"[86] to the conservation of assets.

~~5.120~~5.124 The existing Grade II listed Threshing Barn on-site is proposed for retention – involving significant restoration – as part of the 'Central Hub'

[86] Paragraph 5.219 of the NPS (DfT, 2024)

element of the proposed development, and will be re-used as part of the new facilities for employees and site visitors. The immediate setting of the Barn will be preserved through the retention of the surrounding farmstead. This provides the greatest contribution to the significance of the barn and through its preservation, the impacts on this building are minimised to minor adverse levels. The economic vitality and role of the threshing barn, which is currently in a poor state of disrepair, will be significantly enhanced, and a productive future secured, through the proposals.

~~5.121~~5.125 In terms of off-site assets, the proposals take a sympathetic approach to the boundary with the Heyford Park Airbase Conservation Area. This includes lower landscape mounding at the site boundary adjacent to the end of the former runway to help to preserve the historical context of the runway. This reflects the clear advice and preferences of Historic England and the Oxfordshire County Council Conservation Officer. The wider relationship with and potential impacts on the adjacent conservation area, including listed buildings and scheduled monuments within the former Airbase site, are minimised as a result of separation distances and through the use of the proposed landscaped mounding around the OxSRFI main site, and result in no significant effects. Any harm to the significance of these off-site assets is considered to be 'less than substantial', meeting the NPS ~~(and NPPF)~~ policy test, with residual harm to the setting of any heritage asset to be weighed against the public benefits.

~~5.122~~5.126 Other off-site heritage assets, including the conservation areas in Ardley village, and the registered park and gardens at Middleton Park, and various local listed buildings found in the wider vicinity of the Application Site have all been considered. This includes with regard to the highways elements of the proposed development. Due to a combination of distance or lack of direct intervisibility with the proposed development, there are no likely significant effects on the setting of any asset. Indeed, through reductions in through-traffic in Ardley and Middleton Stoney as a result of the highways works proposed, there will be improvements to some aspects of the environment of these conservation areas. These include the environmental enhancements associated with less traffic, improvements for pedestrians and cyclists as well as reduced traffic noise and, localised air quality improvements.

~~5.123~~5.127 With regard to archaeology, an extensive programme of archaeological investigation has been undertaken using a range of desk-based and on-site, invasive investigations and evaluations, and this has helped inform the design of the proposed development. In particular, design amendments were incorporated to avoid some known features of potential archaeological

interest, including the alignment of the Ardley Bypass to minimise effects on a 'banjo' feature. As a result of the measures taken, and in light of the scale and type of features known to exist within the site, none of the resulting residual effects on archaeological features are considered significant in EIA terms. Mitigation including further investigation and recording of assets will enhance understanding of these undesignated features.

~~5.124~~5.128 The approach taken to heritage issues complies fully with the NPS emphasis on avoiding or minimising harm to heritage assets, and the desirability of seeking to preserve or conserve. Similarly, there is clear accordance with key local plan policies including Policy ESD15, given the minimisation of likely effects on heritage assets to below significant, and at 'less than substantial' levels. Section 6 of this Statement considers these low levels of residual harm in the overall planning balance.

Noise and Vibration

~~5.125~~5.129 In terms of noise and vibration the NPS[87] makes explicit reference to the Noise Policy Statement for England (NPSE) which sets government's policy overall. In addressing noise associated with national networks infrastructure, the NPS makes explicit links to human health and wellbeing, and ecological receptors which can be adversely affected.

~~5.126~~5.130 As required by the NPS, the OxSRFI application includes a comprehensive assessment of potential effects from noise and vibration[88]. This includes assessments of both construction and operational phases of the OxSRFI scheme, based around the construction programme contained in the ES (within Appendix 2.3, CEMP), and based around robust (realistic worst-case) assumptions. The assessment considers likely effects during day and night-time, and takes account of embedded and any additional mitigation measures, applying standard methodologies as defined through the appropriate British Standards (including BS4142) which takes into account background noise levels, and context, in considering likely impacts. Potential noise effects on ecological receptors, including off-site receptors, are addressed separately in the Ecology Chapter of the ES.

[87] The NPS explicitly deals with both noise and vibration through references to 'noise' alone.
[88] ES Chapter 5.(Document 6.5).

~~5.127~~5.131 The NPS requires "*proportionate and reasonable*"[89] mitigation measures linked to engineering solutions and use of materials and other elements of design and layout. The ultimate criteria against which the NPS says schemes will be assessed relate directly to the NPSE aims and tests relating to noise in the context of delivering sustainable development overall – these follow the approach of:

- *Avoid significant adverse impacts on health and quality of life from noise;*
- *Mitigate and minimise other adverse impacts on health and quality of life;*
- *Where possible, contribute to improvements to health and quality of life through effective management and control of noise.*

~~5.128~~5.132 A range of mitigation measures secured through the CEMP and future phase specific P-CEMPs will manage and minimise temporary construction noise effects to acceptable levels and avoid any significant adverse effects. Some minor (not significant) temporary construction effects are shown to be likely during the daytime only, but due to the phasing of construction activities, these effects will only be for short periods and will move around the site as construction progresses.

~~5.129~~5.133 Once operational. the assessment concludes that the OxSRFI will result in a range of likely effects, with the vast majority of nearby receptors experiencing only negligible or minor change. As a result of some elements of the highways works proposed as part of OxSRFI – namely the Ardley Bypass and Middleton Stoney Relief Road - many residents of both Ardley Village and Middleton Stoney will see improvements (reductions) in noise levels due to the reduction in through-traffic levels. However, a small number of receptors on the edge of Ardley are likely to experience an increase in noise from this new infrastructure. While mitigated and minimised through specific measures in the form of highways design and landscaping (including use of mounding) a small number of receptors are likely to experience significant effects at night due to the magnitude of change, albeit it is important to note that absolute noise levels are considered appropriate and acceptable. The existing location (receptor) likely to experience the most significant noise effects is the office building at the nearby household recycling centre to the east of the B430 – this is a non-residential property.

[89] Paragraph 5.236 of the NPS, DfT, 2024.

~~5.130~~5.134 The scale and nature of change regarding increased rail traffic as a result of the OxSRFI forms part of this operational assessment, and given the volume of traffic already using the Chiltern Main Line, is shown to have only negligible or minor effects on the closest receptors to the railway line. Rail noise is included in the assessment and consideration of potential effects on ecological receptors, including the SSSI within part of the rail corridor, with no likely significant effects identified in any sensitive ecological receptor.

~~5.131~~5.135 The assessment also considers the potential effects on future new residential receptors in or close to Heyford Park, both on committed sites not yet built-out, and potential future areas of residential development subject to the live 'new town' planning application. As a result of both the distance between those receptors and the proposed OxSRFI built development, and the use of earthworks and landscaping, the effects are shown to be minor. It is also relevant to note that the baseline noise levels will increase in the local area with other developments in place, and this will reduce the likelihood of adverse noise impacts from OxSFRI. Indeed, to mitigate likely effects from road traffic noise within the Heyford Park 'new town' site itself, the planning application proposes that many of the nearest properties will have alternative means of ventilation (MHVR) to enable windows to remain closed. While not taken into account in the OxSRFI assessment this would further reduce the likelihood of any impacts of OxSRFI on those receptors.

~~5.132~~5.136 Through the range of mitigation measures proposed the OxSRFI scheme clearly satisfies the NPS requirement to avoid significant adverse impacts and mitigate and minimise all other likely noise impacts. The mitigation is both proportionate and reasonable, with specific measures either embedded or proposed explicitly to address and reduce the potential for noise effects on nearby residents, and potential future residents. In incorporating effective mitigation measures, the proposals also accord with relevant local policies, including ESD3, ESD10, and ESD15. However, the residual, albeit not 'significant' adverse effects on some receptors form part of the planning balance.

Socio-Economic Impacts

~~5.133~~5.137 The NPS recognises the potential for NSIPs to have a range of social and economic impacts, and can bring opportunities for employment and other economic benefits during both construction and operational phases. The NPS

requires an assessment both to identify (and prevent or mitigate for) potential impacts, and also to maximise benefits.

~~5.134~~5.138 An SRFI is clearly different to many other forms of NSIP given the potential scale of direct new employment generated by the provision of an operational rail freight terminal together with development floorspace (distribution warehousing). This is recognised in the NPS which refers to potential business and supply-chain impacts associated with SRFIs[90]. In this regard there is significantly more potential for direct economic and employment and skills related benefit than many other NSIP projects.

~~5.135~~5.139 The Socio-Economic assessment included in the ES (Chapter 12, Document 6.12) is based on the schedule of commercial floorspace and uses as set out in Chapter 2, and as expressed on the Parameters Plan. The assessment uses standard metrics and assumptions to determine potential employment on the site (direct and indirect), as well as a review of empirical data and research undertaken to estimate the type of occupations and skills levels that are likely to be supported by the Proposed Development. Economic output of the operational jobs supported by the Proposed Development is measured in terms of GVA.

~~5.136~~5.140 The assessment considers the economic context for the proposed development, rooted in both current population and economic characteristics and trends, and also considers planned growth and development which will see population change. The assessment acknowledges the strength of the local (Cherwell District) economy, and of the wider sub-region, and shows that the Cherwell economy has out-performed against both sub-regional and national statistics around employment growth, and been consistent with national growth in GVA over recent years. The transport and storage sector accounts for around 2.8% of the total GVA for Cherwell, and the sector's GVA increase over the decade 2012 – 2022 outperforms the GVA growth for Cherwell as a whole and the national average over that period.

~~5.137~~5.141 The proposed development site is located close to major locations of growth, namely Bicester (the main growth town in Cherwell District), and Heyford Park, where major development is already consented and where a 'new town' is now proposed. The emerging new Local Plan (Cherwell Local Plan Regulation 19 Proposed Submission Document) confirms the proposed approach to deliver (in the period 2020 to 2042) over 14,000 (58%) of the district's new housing supply in Bicester and Banbury.

[90] Paragraph 5.249 of the NPS (2024, DFT)

~~5.138~~5.142 The development will also support the growing labour market resulting from planned housing growth. Over 24,000 new homes are expected to be delivered across the district, particularly in Bicester and Banbury, increasing the working-age population. Furthermore, the rising pension age—from 66 to 68 by the mid-2030s—is expected to extend working lives and increase labour force participation among older residents.

~~5.139~~5.143 The Proposed Development is expected to generate employment opportunities for a wide range of residents within Cherwell and the wider sub-region across a diverse range of job roles and skills levels. Data regarding resident and workplace earnings in Cherwell indicates that a high proportion of the workforce commutes outside of the district for employment. This is consistent with Travel to Work (TTW) data which suggests that Cherwell is a net exporter of people commuting out of the district for work, and while the available data does not indicate a major imbalance, it does show that the District has a net outflow of commuters. This suggests there are opportunities to support more sustainable patterns of travel to work, and reduce the need to travel, by additional job creation within the District. New employment opportunities will also benefit unemployed individuals — currently around 20,000 in the sub-region and 1,400 in Cherwell — by offering access to jobs, training, and pathways back into the labour market.

~~5.140~~5.144 The OxSRFI project would deliver notable construction employment (approx.. 790 per annum over the seven year assumed construction period) and wider economic development opportunities in support of the construction sector present in Cherwell and beyond. The operational phase is expected to see in the region of 9600 FTE (gross), 90% of which are expected to be filled from labour within Cherwell and the wider sub-region (travel to work area).

~~5.141~~5.145 Occupations and skills required will be across a range from those traditionally associated with storage and distribution (such as HGV and van drivers) to other highly skilled occupations such as managers and technical roles in transport and distribution, purchasing, as well as data analysts and IT, engineers and machine operatives. Evidence from Working Futures[91] suggests that up to a quarter of jobs in storage and distribution can be qualified as being highly skilled. A report prepared by JLL and Oxalis Planning and submitted with this DCO Application also notes the increasing sophistication of roles within the sector[92].

[91] Warwick Institute for Employment Research and Cambridge Econometrics, 2014
[92] 'Market Analysis Report' (Document 7.1), 2025.

~~5.142~~5.146 Through the provision of additional strategic employment land and premises, and delivery of improvements to transport infrastructure, the Proposed Development would contribute to the goal of delivering expansion, relocation, and new businesses investing in the Oxfordshire economy as defined by OxLEP and more recently by the Oxfordshire Growth Commission. It also accords with one of the overarching objectives of the NPPF to support economic growth, including responding to the needs of key sectors of the economy (logistics).

~~5.143~~5.147 Other likely socio-economic benefits from the proposed development include:

- off-site and indirect jobs (approximately 3600 FTEs)
- annual GVA of around £482m (net additional £361m)
- access to training opportunities as part of new job creation
- significant local business rate revenue (of around £48m per annum)[93]
- Local public transport and accessibility improvements, including new active travel links and infrastructure;
- Access to new ~~publically~~publicly accessible open spaces and nature areas on-site;

~~5.144~~5.148 It is clear that the proposals accord with the NPS in seeking to maximise the economic benefits from the national infrastructure proposed, with adverse socio-economic impacts minimised or avoided. The significant investment (circa £1 billion in total) represented by the proposed scheme includes major improvements to local highways and other infrastructure, with improvements in the performance of key junctions on the M40, particularly Junction 10 which has been a major challenge in terms of congestion and capacity over many years. Part of the wider economic and environmental benefit of the scheme is the improved journey times and improved reliability of this key junction on the strategic road network, which in itself plays a key role in helping unlock other planned and proposed developments in this part of Cherwell.

~~5.145~~5.149 At the local level, there is clear and positive synergy between the expected economic outcomes and impacts from OxSRFI and a range of local planning objectives of the Local Plan. ~~–~~Key examples include Local Plan spatial objective SO1 focused on facilitating economic growth and employment which accords with major themes within the overall vision for Cherwell District as set out in the Local Plan relating to an economy which is

[93] See ES Chapter 12, Socio-Economic

> "*vibrant and diverse with good transport links and sound infrastructure*…[and]… *will grow to provide more diverse employment for our increasing population and reduce the need to travel outside the District for work*"
> (Cherwell District Local Plan, July 2015, paragraph A9, 'Our Vision for Cherwell District')

~~5.146~~5.150 Other relevant policies relating to the local economy include Policy PSD1 which applies the presumption in favour of sustainable development. The adopted Local Plan (2015) focuses employment development on existing sites, and in urban areas, but through Policy SLE1 does provide criteria against which new employment proposals outside of those locations will be assessed. The adopted Local Plan policy pre-dates, and is not fully aligned with, the current NPPF regarding the approach to be taken by local policies in enabling economic development and supporting key sectors. However, Policy SLE1 includes criteria relating to issues of design, sustainable construction, avoiding significant adverse impacts on local village character, not having undue detrimental impacts on local amenity, and not giving rise to inappropriate traffic impacts. The criteria of Policy SLE1 relate very well to the requirements of the NPS.

~~5.147~~5.151 Local Plan SLE4 supports improved transport and connections, with explicit support for enabling modal shift, and specific emphasis on the need for improvements to M40 Junctions. There is also clear synergy with other, wider local strategies and policies, for example, the in-principle support to increasing rail freight in Oxfordshire as set out in the recently adopted *OxRail 2040: Plan for Rail* by Oxfordshire County Council.

~~5.148~~5.152 The social and economic benefits and impacts of OxSRFI referred to above are clearly significant, and weigh heavily in favour of the proposals in the overall balance set out in Section 6 of this Statement.

Commented [BH8]: We definitely need to add the planning balance conclusions here. Ie these are very significant benefits which weigh heavily in favour of the proposals

Commented [SH9R8]: COME BACK TO THIS?

Water quality and resources

~~5.149~~5.153 As required by the NPS, the application (ES) includes consideration of water quality issues. Baseline data, as set out in Chapter 9 of the ES, shows that the relevant water bodies have existing issues both in terms of overall water quality, ecological status, and chemical status which range from 'poor' to 'moderate', or 'fail'[94]. Agricultural and rural land management and pollution

[94] ES Chapter 9 baseline section.

from the water industry are considered the key issues preventing improvement in status.

~~5.150~~5.154 Both the construction and operational phases can have potential impacts on water quality, and a range of measures are proposed to mitigate or prevent the risks of such impacts. This includes through a range of measures identified in the CEMP (ES Appendix 2.3, Document 6.2C) for the construction process.

~~5.151~~5.155 The ES explicitly confirms that the approach would comply with objectives of the Water Framework Directive (WFD), and a WFD Assessment forms part of the ES (Appendix 9.5, Document 6.9E). With proposed mitigation measures in place during both the construction and operational phase of the Project, it is unlikely that the Project will cause any WFD deterioration or change in water body status, or prevent attainment, or potential to achieve, future good status.

~~5.152~~5.156 The potential effects on the water environment from the construction and operational phases have been assessed to be negligible to minor adverse following the implementation of appropriate mitigation measures, with no likely significant effects. The minor residual effects need to be considered as part of the final overall planning balance.

Impacts on Transport Networks

~~5.153~~5.157 A comprehensive package of transport improvements form a key part of the Proposed Development. These improvements include extensive physical improvements to the strategic and local highway network together with comprehensive improvements to the pedestrian and cycle network and commitments to public transport enhancements and a full range of other Travel Plan measures. The extent of highway works and other transport related works are outlined in full in Section 3 of this Statement. In combination these works fully mitigate the effects of the scheme and deliver significant benefits. The works proposed have been directly shaped and informed by the work of the Transport Working Group (TWG) established in the earliest stage of scheme development (2020) by the Applicant. The TWG has met regularly since its inception, and is formed of the Applicant, National Highways, OCC Highways, and Cherwell District Council (with meeting papers and invites also sent to West Northamptonshire Council). The Applicant has also engaged with representatives of the Department for Transport in the context of wider planned growth and development.

~~5.154~~5.158 A comprehensive Transport Assessment (TA) forms part of the submitted application (ES Appendix 3.1, Document 6.3A). The TA provides a clear understanding of the likely traffic and transport impacts of the OxSRFI scheme, and has regard to the relevant national and local polices, and their objectives, as required by the NPS. This includes assessment of likely traffic effects during the construction process, and appropriate mitigation secured via the CEMP (Document 6.2C) including restricted construction times and the use of construction traffic management plans to prevent any significant adverse transport effects during the construction phase.

~~5.155~~5.159 As described in the ES Transport chapter (Chapter 3, Document 6.3) and the associated TA[95], the proposals would reduce congestion and improve reliability for local road-users, creating additional capacity which also removes challenges to the delivery of wider housing and economic growth committed in the Local Plan. The TA examines the distribution and assignment of vehicle trips associated with the Proposed Development including an appraisal of HGV movements, which would be controlled via the HGV Routeing Strategy, to evaluate the impact of the development vehicle trips on the surrounding transport infrastructure. The OxSRFI proposals therefore directly respond to the national policy requirements, both with regard to freight and people (employees and visitors).

~~5.156~~5.160 As set out elsewhere, the TA is inherently 'cumulative' in nature, and in addition to an extensive list (agreed with the TWG) of committed and planned growth, consideration has also been given to emerging major, but not 'committed' development proposals. Informed by extensive modelling using the appropriate local model, the Proposed Development will provide improved road access to the Main Site through embedded mitigation measures which provide the required access and connection to the SRN, and prevent, or reduce to acceptable levels, the otherwise likely significant transport effects of the Proposed Development.

~~5.157~~5.161 The NPS (and NPPF) make explicit reference to the importance of encouraging transport by a range of modes of travel, and enabling a modal shift, with an expectation of integrating 'sustainable transport modes' (and responding to the needs of pedestrians and other road users) when improving or developing infrastructure[96]. The Proposed Development, through good

[95] ES Appendix 3.1, Document 6.3A.
[96] Paragraph 5.273, NPS, DfT 2024.

sustainable design, will significantly improve public transport, pedestrian, and cyclist provisions, providing travel opportunities for non-car-based modes of transport. The application also responds directly to the NPS requirement for SRFIs to include a Travel Plan (which are also explicitly required by NPPF policy for all developments that will generate significant amounts of movement[97]).

~~5.158~~5.162 One of the 'generic impacts' identified in the NPS is that of carbon emissions as part of national efforts to reduce greenhouse gases – this is referred to above regarding carbon emission and climate change issues. The Proposed Development would deliver significant improvements to the strategic and local highways networks, including through removing some 53million HGV miles from the strategic highway network overall due to the use of rail freight.

~~5.159~~5.163 The assessments contained in the TA, and described in the ES, confirm that the proposed embedded Highway Works, in combination with the STS, PTS and Framework Travel Plan, and additional mitigation measures, would satisfactorily accommodate the forecast travel demand from the Proposed Development. The proposals therefore accord with requirements of both the NPS and NPPF, and ensure that the impacts on transport networks are fully considered, and the transport impacts appropriately mitigated.

~~5.160~~5.164 Beyond road transport issues, Rail Reports submitted as part of the Application (Documents 7.2A, B and C) consider rail capacity and connectivity issues – also see below regarding 'use of rail freight'. These help to explain the need for and benefits of the OxSRFI and explain how the Proposed Development fully accords with the NPS requirements and criteria regarding rail capacity and the access, operation and scale of the rail freight terminal. In relation to the criteria of the NPS the OxSRFI will:

- be located alongside the strategic rail and road networks;
- provide main line access which will allow for trains from either direction;
- be capable of handling trains up to the maximum 775m total train length with appropriately configured on-site infrastructure and a layout that will minimise the need for on-site rail shunting;
- provide sidings, hardstanding and handling equipment capable of processing up to 8 trains per day initially and capable of increasing the number of trains handled to 12 per day;
- accept trains of W8 loading gauge, the design future-proofed for W12 gauge and electrification;
- have the ability to operate on a 24/7 basis;

[97] ~~Paragraph 118~~Policy TR6, NPPF, MCHLG ~~2024~~2026

Formatted: Superscript

Commented [BH10]: This seems a bit light to me. Do we need to explain in more detail the traffic generation from the scheme - then the proposed mitigation (can be a list) - then the potential residual benefits and the harms?

Commented [SH11R10]: COME BACK TO THIS

- provide appropriate provision for the receipt of HGVs including secure HGV parking provision with associated proportionate services and facilities to support driver wellbeing;
- allow for future electrification of reception sidings;
- provide for a number of rail connected or rail accessible buildings, plus rail infrastructure to allow more extensive rail functionality within the site in the longer term.

~~5.161~~5.165 The Rail reports also identify the wider benefits of the OxSRFI to the operation and maintenance of the main line. These include:

- Signalling headway, increasing the number of trains which can be operated on the section of route;
- Loading gauge, creating another route accessible by intermodal trains between the Midlands and London;
- Drainage of the surrounding land, reducing the risk of flooding of the main line;
- Maintenance access points for Network Rail staff and plant, reducing the time taken to access and exit engineering possessions; and
- Closure of the Bucknells Farm level crossing.

~~5.162~~5.166 In addition, appended to this Planning Statement (Appendix 3) is a technical note relating to the strategic aspirations of OCC and others for a future new passenger railway Station which may – if ultimately proven to be viable and deliverable by the rail industry or other interested parties - be located in the vicinity of the Main Site on the site of the former Ardley Station. While the likelihood, and timing, of any potential future passenger Station nearby is unknown, the interest and support for the principle captured in the 'OxRail 2040' Strategy is noted, and the submitted note confirms not only that OxSRFI would not prejudice future delivery of a new Station off-site, but that some of the proposed rail infrastructure would help to enable a new Station and/or help to reduce construction costs.

~~5.163~~5.167 The provision of a new SRFI to expand the network of SRFI's across the regions, including into the south-east, not only directly accords with the NPS, but is directly aligned with other national strategies and their objectives. This includes the '*Future of Freight*' (DfT, 2022, summarised in Section 4 of this Statement) which recognises the role and importance of freight in the logistics sector to the UK economy, with an emphasis on the importance of planning and investment to support its growth. Similarly, enabling and achieving a modal shift of freight movement is an explicit objective of the 'Decarbonising Transport' document prepared by the DfT in 2021.

~~5.164~~5.168 As an early example, the letter of support from Viridor helps demonstrate wider industry appetite for exploring ways in which rail freight might be integrated into supply chains and transportation networks.

~~5.165~~5.169 The appended NPS Compliance Tracker sets out how the Proposed Development aligns with detailed rail related policies of the NPS. However, it's clear that the OxSRFI proposals accord directly and fully with the NPS which explicitly seeks to expand the network of SRFIs including into new regions, and in locations where SRFIs have access to strategic road and rail networks.

~~5.166~~5.170 The submitted Application confirms not only that the proposed Main Site can deliver the required access to the strategic road and rail networks, but also that the impacts on these networks are acceptable. Furthermore, the conclusions as set out in Section 3.8 of the Transport Chapter of the ES (Document 6.3) are that with the proposed embedded and additional mitigation, OxSRFI would give rise to a mixture of moderate, large and very large (significant in EIA terms) permanent beneficial effects.

Cumulative Effects

~~5.167~~5.171 The issue of potential cumulative effects is addressed in the submitted Environmental Statement (ES) as required by the regulations, PINS guidance for NSIPs, and by the NPS. In simple terms, in accordance with standard best practice, the ES considers the OxSRFI proposals alongside other development 'commitments' within the vicinity of the Application Site. ES Chapter 1 (Introduction) includes information about the full list of sites considered, following agreement with the local authorities. 'Commitments' includes sites allocated (in a local plan policy) or which have the benefit of planning permission. The Applicant worked closely in consultation with the Local Planning Authority (Cherwell District Council, CDC), and with National Highways and Oxfordshire County Council (OCC) Highways through the Transport Working Group (TWG), to agree the appropriate sites for inclusion, and approach to the assessment of effects.

~~5.168~~5.172 The Transport Assessment (TA, ES Appendix 3.1) is cumulative in nature, with the modelling undertaken explicitly including traffic (and relevant planned mitigation) from a much wider range of planned and consented sites than those considered in most other parts of the ES. This provides a robust assessment of the likely effects of the additional traffic from OxSRFI in addition to the traffic expected on the network as other relevant committed sites come forward. The assessments of Air Quality and Noise are also based on data from the TA, enabling consideration of cumulative scenarios. As referred to

above, the Applicant worked closely in consultation with the (TWG) to agree the approach to the assessment of effects, and appropriate mitigation.

~~5.169~~5.173 In considering the potential for cumulative effects of the Proposed Development with other planned developments, the emphasis is on likely shared receptors or populations and species likely to experience effects from the Proposed Development and one or more other committed development project. As set out in the ES, geographical limits and timing issues and implications are often key to assessing the cumulative effects over and above the specific environmental effects of the Proposed Development or other developments. Also, some environmental topics covered by the ES, and certain types of receptors, are more relevant or susceptible to potential cumulative effects.

~~5.170~~5.174 In addition to the above based on consideration of 'committed development', the approach taken to the assessment in the OxSRFI ES reflects the dynamic nature of the local context and the complexity with regard to emerging, but not 'committed' development proposals. Specifically, in response to dialogue with CDC and OCC, and in response to wider comments and questions raised from consultation responses from Parish Councils and members of the public, the ES has also sought to respond to the fact that several major sites have been proposed for development via planning applications over recent years in the vicinity of the OxSRFI Application Site.

~~5.171~~5.175 These other proposals and sites include applications for employment (distribution and logistics) development on the north-eastern side of M40 Junction 10[98] which were taken to CDC's Planning Committee twice recently - once in summer 2025 when one site received a resolution to grant consent and one a resolution to refuse consent, and again in early 2026 when both schemes were refused. At the time of writing both are understood to be subject to live planning appeals which could result in one or both, or neither, being approved in due course.

~~5.172~~5.176 The other proposals, also include the Heyford Park 'new town' proposal for 9000 dwellings, and the Puy du Fou leisure proposals east of the M40 close to Bucknell. Both of these are subject to undetermined planning applications, with ongoing work by the respective applicants to respond to queries and requests from various consultees (including CDC, National Highways and OCC Highways).

~~5.173~~5.177 The ongoing nature of these applications and the evidence which underpins them, and their uncertain status, adds complexity to any attempt to

[98] By Albion Land, and Tritax Bigbox, referred to in Section 2 (and Section 5) of this Planning Statement.

reach conclusions about the potential for cumulative effects by OxSRFI in combination with them. It is understood that the Applicants for both the 'new town' and the Puy du Fou park are revising and updating their assessments of likely transport impacts, and mitigation required for their schemes, including consideration of cumulative effects with OxSRFI. These challenges notwithstanding, to assist consultees, PINS, and the Secretary of State, the Applicant has sought to provide a proportionate and meaningful assessment of potential or likely cumulative effects in the ES.

~~5.174~~5.178 The narrative provided across the ES regarding these emerging, non-committed proposals is based on information in the public domain which in many cases is not yet complete or finalised, nor agreed with relevant consultees. Summary Conclusions regarding cumulative effects are set out in ES Chapter 16, and are not repeated here in detail.

Alternatives

~~5.175~~5.179 The NPS requires the Applicant to provide a "*proportionate*" consideration and description of the alternatives studied or considered, and the reasons for the choices made[99]. The Applicant has undertaken a proportionate assessment of potential alternative sites and this is set out in the Alternative Sites Assessment (ASA) which is included as an Appendix to the ES. The ASA demonstrates that there are currently no SRFIs along the M40 corridor, and none which serve Oxfordshire. An Oxfordshire SRFI would expand the existing network of SRFIs, fill an identified gap in the national network, meet the needs of existing and future businesses in Oxfordshire, and national logistics operations, seeking locations which can serve markets in the wider south-east, Midlands, and London.

~~5.176~~5.180 The ASA concludes that after considering constraints such as environmental matters, planning policy, proximity to sensitive uses, and/or availability, there are no more suitable alternative sites when compared to the OxSRFI site from a planning and environmental perspective. The ASA therefore demonstrates that the OxSRFI is the most preferable site within the established Search Area of the assessment for the delivery of an SRFI.

Commented [BH12]: Steve, do we also need a short para re alternative approach to design / layout etc? presumably this could cut and past from the ES?

~~5.177~~5.181 In addition to alternative sites, the Applicant has also described the alternative options considered with regard to site design and layout. This forms part of the design evolution detail described in overview in ES Appendix 2, and in more detail in the Design Approach Documents (DADs, Document

[99] Paragraph 4.20 of the NPS (DfT, 2024)

series 5.5).

~~5.178~~5.182 A key driver of the approach has been to achieve good design through siting and design measures related to the existing landscape character, function and surrounding land form. Various options were considered regarding the size and location of the proposed warehousing 'zone' within the site to find the most efficient and appropriate disposition of uses within the site. This included consideration of various options of how to configure the rail terminal and associated infrastructure. As shown in the Main- DAD (Document 5.5A), the key components of the design of the Proposed Development evolved, with key components being a connection to Chiltern Main Line, as well as to the M40 and moving traffic away from local village centres.

~~5.179~~5.183 The design approach taken forward for the Proposed Development balances a range of environmental and operational considerations based on the constraints and opportunities presented by the site. Details of various options and alternatives are provided in the DAD, but having considered a number of alternative approaches to site design and layout, and in light of the range of assessments undertaken to prepare the ES – and public consultation responses – the Proposed Development as submitted is considered to best achieve this balance.

6.0 SUMMARY OF CONCLUSIONS AND 'PLANNING BALANCE'

6.1 This Statement accompanies an application for a Development Consent Order under Section 37 of the Act for a Strategic Rail Freight Interchange (SRFI) on land adjacent to the Chiltern Main line, and close to Junction 10 of the M40 in Cherwell District, Oxfordshire.

6.2 The NPS identifies a 'compelling need' for an expanded network of SRFIs, and includes a presumption in favour of NSIP projects, subject to an assessment of the range of potential effects and environmental and other considerations being undertaken to demonstrate compliance with NPS policies[100]. In the context of that positive presumption of the NPS, this Section of the Planning Statement draws conclusions regarding the overall 'planning balance' of issues, taking into account the benefits of the OxSRFI proposals alongside any likely 'harms' identified from the appraisal process, including from the Environmental Statement.

6.3 A review of the relevant legislative and policy context has identified the following key considerations which are of direct relevance to any assessment of the Proposed Development:

- Strong national support for growth in rail freight with the Government having set a target of at least a 75% growth with SRFIs being crucial to that growth.

- The Government have identified that there is a compelling need for the development of Strategic Rail Freight Interchanges (SRFIs) to maintain network performance, meet customer needs, ensuring resilience in national networks, to support economic growth and help deliver the government's environment and net zero priorities.

- The NPS advises that "*substantial weight*" should be given to considerations of need in decision-making where proposals align with the NPS[101].

- The Government identifies a compelling need for an expanded network of SRFIs throughout the country, and acknowledges that given the

[100] NPS, paragraph 4.2.
[101] Paragraph 3.22, NPS, DfT 2024.

locational requirements and the need for effective connections for both rail and road, the number of locations suitable for SRFIs will be limited.

- National policy sets out that as a result of the specific locational requirements, countryside locations may be required for SRFIs, and that some residual effects from nationally significant infrastructure development may be unavoidable.

- Regionally there are currently no SRFIs along the M40 corridor, and none which serve Oxfordshire – there is clear evidence of market needs by existing and future businesses in Oxfordshire, and national logistics operations seeking locations which can serve markets in both the South East and Midlands with the opportunity to serve parts of London (the NPS highlights the particular challenge of expanding SRFI's in London and the South East).

- Local policy support for a sustainable economy that will grow to provide more diverse employment for the District's increasing population, and reduce the need for Cherwell's residents to travel outside the District for work.

6.4 In order to consider the overall planning balance it is necessary to consider the main benefits and positive effects of the Proposed Development alongside any likely adverse impacts or residual harm.

6.5 The identified benefits of the proposals involve:

- The national need for the development and the specific need for the development in the identified market area. The OxSRFI will address the identified "*compelling need*" for SRFIs, and successfully expand the network of SRFIs. The Proposed Development is in a strategically significant location for distribution and logistics activity on the M40 and Chiltern Main Line with excellent access to both Midlands and South-Eastern markets and distribution networks, including an ability to serve parts of London. There are currently no SRFI's within the market area. OxSRFI is within 4.5 hours (by HGV) of around 92% of the UK population. Addressing the need for the proposed development should carry substantial positive weight.

- The positive social and economic impacts of the proposals through the creation of around 9600 jobs once fully operational and a significant

contribution to the sub-regional economy with annual GVA of around £482m (net additional £361m). The investment proposed (around £1bn) would deliver a range of economic benefits (direct and indirect) for the local, regional and national economy which should be given substantial weight in favour of the scheme.

- Removing an estimated 53million HGV miles from the national road network per year through enabling the shift of freight from road to rail, with associated congestion and carbon emissions reductions. This equates to over £61 million per year in monetised environmental benefits. The NPS recognises the crucial role rail transport plays in delivering reductions to pollution and congestion and facilitating the transfer of freight from road to rail. In this context these benefits should be afforded substantial weight in favour of the scheme.

- Delivery of additional capacity and improved performance and reliability on the strategic road network (SRN) – specifically at Junction 10 of the M40, addressing long-standing and significant problems on this part of the road network. Journey times and reliability will be improved for local as well as 'strategic' road-users as a result of the proposed highways infrastructure. Alongside this the Proposed Development will deliver new infrastructure which will help address capacity and environmental issues associated with the local road network, in particular through the Ardley Bypass and Middleton Stoney Relief Road. In combination these improvements should be afforded significant weight in favour of the proposals.

- A comprehensive package of Travel Plan measures includes significant investment (in excess of £3.25m) to deliver enhanced and new bus services which will serve the site and deliver connectivity benefits in the area. These benefits should weigh in favour of the proposals.

- New and improved 'active travel' pedestrian and cycle links will serve the site and deliver benefits for local communities. These new links and connections will deliver benefits both socially and environmentally, and will support mode shift as part of the wider Travel Plan measures. These benefits are material and weigh in favour of the proposals.

- Significant Green Infrastructure (GI) and landscaping accounting for nearly 60% of the total Application Site will deliver or secure a wide range of retained and new habitats incorporated into a comprehensive

green infrastructure network, including new and improved public access to walking and cycling routes. As part of this GI, and although not mandatory for this project, OxSRFI will deliver in excess of 10% biodiversity net gain (BNG) through new habitats, as well as management and enhancement of retained habitat features. As an integrated and core part of the development proposals these benefits weigh strongly in favour of the scheme. GI and landscaping will include:

- Over 60ha of new broadleaved woodland with ~~nearly 14ha (approximately~~13.7ha (around 60~~.5~~%) of the existing woodland retained and enhanced;
- In excess of ~~13.9km~~14.1km of new species rich hedgerow (a net increase in hedgerows overall);
- A substantial increase in calcareous grassland (with over ~~23ha~~15ha of new provision) to compensate for the loss of 0.49ha associated with development affecting the SSSI. This and associated ecological benefits are directly relevant to the likely low magnitude but adverse effects associated with concentrations of some forms of airborne pollution referred to in Section 5 and below.

- Other important benefits which weigh in favour of the scheme but which should be afforded lesser weight include:

  - Delivery of energy efficient buildings including on-site renewable energy generation, which forms part of both technological and 'nature-based' responses to climate change resilience, something to which the NPS explicitly attaches specific '*positive weight*'[102].
  - Reductions in surface water discharge from the site during storm events as a result of the sustainable drainage system proposed, delivering benefits to downstream land and property.
  - Local noise reductions as well as air quality improvements as a result of the Ardley Bypass and Middleton Stoney Relief Road, with general improvements to the urban environment within these villages from a reduction in through-traffic as a result of the proposed highways works.
  - Through the 'central hub' element of the proposals, OxSRFI will restore and protect a listed building, giving it a viable new use into the future.

6.6 The identified residual harms which would result from the Proposals involve:

[102] NPS, paragraph 5.40.

- While the scheme will deliver net transport benefits in terms of reduced local congestion, and improved reliability and journey times, the development will generate additional traffic on the local – albeit substantially improved – highway network. These harms are not considered significant and should be given limited weight.

- Some unavoidable significant residual landscape impacts at the site level and immediate context. Other wider likely landscape effects will be reduced to below significant levels over the medium to longer-term (by 15 years) as the proposed planting and landscaping matures. Having regard to the site's context and the approach to the design of the scheme, including the incorporation of extensive landscaping and screening, these residual harms should be given moderate weight in determining the application.

- Residual, significant visual effects on users of PROW on the Main Site itself, with other residual effects generally up to moderate in some cases (not significant) on a limited number of receptors, including a small number of properties in Ardley and on the eastern edge of Middleton Stoney, users of PROW close to the site, and road-users from certain stretches of some local roads. As above, these residual effects must be considered having regard to the context of the site and the high-quality approach to the design of the scheme and its mitigation. These matters should therefore be afforded only limited weight.

- The loss of some ~~31ha~~37.7ha of best and most versatile agricultural land. Albeit this accounts for only ~~9~~8% of the total Application Site area, in ES terms this is a significant residual effect which cannot be mitigated by the proposed protection and re-use of soils as part of the extensive landscaping on-site. This should be afforded limited weight.

- Loss of some non-designated heritage assets will result in 'less than substantial' harm to the significance of the conservation area on the former RAF Heyford (now part of the wider 'Heyford Park' redevelopment proposals). While not significant effects in ES terms, as required by the NPS (~~and NPPF,~~ and local plan policies), this less than substantial harm must be weighed against the public benefits of the scheme. Given the level of harm identified this should be given little weight in the determination of the proposals.

- Other minor adverse effects of the scheme have been identified and should be given some, but limited, weight in the determination of the proposals. These include:

    - As a result of the scheme being approved the lease for an existing safeguarded waste facility (the green waste IVC) would not be renewed (resulting in its loss). The development would also result in the sterilisation of some remaining mineral resource, creating some conflict with policies of the local Minerals & Waste Core Strategy.

    - While not significant, and minimised to acceptable levels, the scheme will result in some adverse changes to the local context for small numbers of the closest 'receptors' in terms of noise, air quality and lighting effects, and minor residual adverse visual effects.

    - the Proposed Development would result in the loss of existing trees and hedges on-site – including some 7.1ha of Broadleaved Woodland, and 11.3km of hedgerows. While the overall net result is positive in terms of significant new tree and other planting (as set out above) these losses should be considered in the balance.

    - Some likely residual minor (not significant) adverse air quality effects on the Ardley Cutting & Quarry SSSI (and similarly low magnitude effects on other designated sites as shown at Table 6.11 in ES Chapter 6). The NPS (at paragraph 5.61) requires any adverse effects to be weighed against the benefits of the scheme, and advises that proposals should only be approved where such effects are '*clearly outweighed'* by the benefits. The assessment of overall likely effects and policy compliance provided in this Planning Statement, including the summary of the range of overall benefits referred to below, is considered to demonstrate that these likely low magnitude and minor non-significant effects are clearly outweighed by the overall wider benefits of the proposed development.

Formatted: Font: 14 pt

Overall 'Planning Balance'

6.7 The OxSRFI proposals accord with, and deliver the objectives of, the NPS. The proposals would deliver significant benefits which directly respond to the economic and environmental objectives and opportunities identified for the 'national networks' including with regard to meeting some of the need identified for an expanded network of SRFIs and delivering a shift of freight from road to rail. In meeting this need, OxSRFI responds positively and directly to the opportunities to support the economic and environmental benefits and imperatives set out in the NPS, including supporting and enabling trade and productivity as part of an efficient logistics and distribution sector.

6.8 There are also clear synergies with, and strong alignment between, the Proposed Development and a range of other relevant national policy and strategic documents and material considerations referred to in this Planning Statement. This includes the NPPF which is explicit in identifying the "~~*significant*~~*substantial weight*" to be given to supporting economic growth, and on the importance of responding to the specific locational requirements of key sectors, including storage and distribution operations which are recognised as a critical element of the national, regional and local economy.

6.9 While the NPS establishes there is a need for additional SRFIs if the government's policy to encourage freight from road to rail is to be met, evidence of local and regional need and opportunity to deliver rail-connected strategic distribution is also provided as part of the application submission (in the Market Analysis Report[103] and GBRf Supporting Statement[104] referred to in this Planning Statement). The clear advantage and benefit of the OxSRFI site compared to other potential distribution and logistics sites is the delivery of the rail freight terminal and its ability to reduce the carbon footprint, and congestion on the national road network, associated with the need to move, process and store goods. The OxSRFI being located in the south-east, and in a location capable of serving part of London, further underlines the degree of compliance with NPS policy given the challenges and difficulties to date in delivering sites in this region.

6.10 The NPS seeks to balance the need to provide a comprehensive approach to scheme assessment, design, and mitigation with the need to be proportionate and pragmatic in terms of residual impacts. The NPS offers direct advice with regard to the decision-making process and judgements and issues which should form part of that process. Key examples are found in the NPS policy

[103] Document 7.1.
[104] Document 7.2B.

on climate change and carbon emissions where the NPS is clear that some residual effects are likely and not reason to prohibit or withhold consent. There is also acknowledgement that some residual negative effects on transport networks from SRFIs, where appropriate obligations and/or mitigation is committed to, should attract '*limited weight*'.

6.11 It is clear that when considering the benefits of the scheme alongside any residual harms or adverse impacts the planning balance tips decisively in favour of the proposals. While there would be some residual adverse impacts, the nature and scale of those impacts has been minimised through mitigation and design. It is the view of the Applicant that these residual impacts are to some degree unavoidable in delivering a strategic development of this scale, but also that they are reduced to acceptable levels. Critically, it is clear they are greatly outweighed by the significant benefits and positive effects which would be delivered by the Proposed Development.

Commented [BH13]: I think the benefits list should come first before the harms list

6.12 Our overarching conclusion, supported by the appraisal and evidence set out in this Statement, are that the significant benefits of the proposal greatly outweigh the limited residual adverse impacts, and that development consent should be granted in accordance with the presumption in favour of granting consent set out in the NPS.

APPENDICES