

oxfordshiresrfi@planninginspectorate.gov.uk

14 July 2026

Dear Sir/Madam,

Re: Oxfordshire Strategic Rail Freight Interchange - CPRE Oxfordshire Registration of Interest

The Campaign to Protect Rural England (CPRE) Oxfordshire request to register our interest at the Examination of the application for a Development Consent Order for the Oxfordshire Strategic Rail Freight Interchange (SRFI).

We have also submitted this request via the Planning Inspectorate website page “Have your say” and in our “Registration Comments” we reference this letter, which we were unable to attach. This letter should be considered a statement of our “Registration Comments”.

CPRE Oxfordshire works to improve, protect and preserve the landscape of its towns and villages for the benefit of everyone.

Whilst our charity is, in principle, supportive of moving freight from road to rail, we believe this scheme, as proposed, will not achieve this aim to any significant extent and the resulting loss of countryside and environmental harm will vastly outweigh this.

We reference and reaffirm our comments made at the first stage of consultation, in our letter dated 30 June 2022, from Robin Oliver, Chair of CPRE Cherwell District Committee (a subcommittee of CPRE Oxfordshire). It is our view that the key concerns we raised at this time remain unresolved.

Having reviewed the current documentation, we summarise our outstanding concerns below, followed by more detail on each point.

- 1. This is inappropriately designated as a NSIP scheme**
- 2. The need for this SRFI is unproven; it is in the wrong location and costs are likely to escalate**
- 3. There is insufficient analysis of the cumulative impact of the scheme alongside others**
- 4. Measures proposed to mitigate the impact on nearby road congestion are insufficient**
- 5. The loss of countryside and the environmental harm of this development would be unacceptable**

1. This is inappropriately designated as a Nationally Significant Infrastructure Project (NSIP) scheme

We consider this project to essentially be a new regional lorry and warehousing operation, with inadequate proof that it might increase the use of rail freight and reduce the road mileage of lorries. The proposal exploits the NSIP route, to override local concerns, by elevating what is a simple commercial proposal that should be evaluated alongside other planning applications of “national importance”.

The fact that it is on the National Freight Network is not sufficient justification to classify it as strategic. CPRE are keen that this development mirrors the same rigorous process that is applied to local planning applications. This is particularly pertinent in this case, as two proposed major road freight warehouse developments close to this site have been considered, rejected and are now both going to appeal through the local planning process. Should these proceed, the cumulative impact of these two schemes and the proposed SRFI must be evaluated (see point 3 below). Nearby Bicester and Banbury already have extensive storage and distribution developments already constructed or soon to be constructed as part of the revised Cherwell Local Plan, all with close access to the M40 motorway that negate any logical reason for further storage and distribution in this area.

2. This SRFI is not in the right location, its need is unproven, and costs are likely to escalate

We consider that there is a lack of evidence that this SRFI is needed as it is close to existing ones at Daventry and Northampton Gateway.

We consider that there is a lack of evidence that this SRFI is needed, predominantly because :

- it is close to existing ones at Daventry and Northampton Gateway,
- It is not based in either the existing or revised Cherwell Local Plans,
- the Bicester and Banbury areas are already over supplied with B8 storage and distribution with more planned to be constructed close to Junction 9 of the M40 and

- there has also been no identification of future requirement for Ardley station by Chiltern Railways.

Additionally, there is a significant lack of documentary evidence that traffic will be genuinely new transfers to rail from road and not merely abstracted from other SFRIs. There is a brief mention of three ports the SRFI could serve: London Gateway, Felixstowe and Liverpool. All three can be more directly served by other SRFIs. For example, Northampton Gateway, which opened in recent months and is close to Junction 15 on the M1, has plenty of capacity.

Representatives from our charity have attended public consultation events which promote this scheme and we have raised the question of need in this location. The response we were given was that “this site is better suited to the east west rail / road links and those to the south”. This is unjustified reasoning, which merely identifies that to serve those markets, a location somewhere like Swindon or Newbury, situated on the M4 corridor, but falling outside the area of assessment in relation to alternative provision, would be far more suitable. This location is unsuitable and there has been inadequate consideration of other locations.

It is also our view that the profitability of this scheme is questionable and the costs underestimated. This should be reassessed.

This SRFI was first conceived at a time when warehousing capacity was an issue. Since 2015, however, warehousing capacity has risen from about 435 million square feet to about 700 million. In addition, there has been an increase of warehouses with over 1 million square feet in capacity during the last decade (representing an increase of 345%). It is therefore questionable whether there is a need for a site of this size, and the likelihood of it being fully utilised. Should this SRFI be under-utilised, we would end up with a large ‘blot on the landscape’ for no benefit.

Furthermore, we note from the documents that the developer proposes an upgrade to Junction 10 and alterations to Junction 9 of the M40, with Highways England identifying that this would be required at developer expense. Given that the project to upgrade Junction 10 will be a national matter, it will be overseen and charged back by the National Highways to the project. This would be a highly significant cost and may well render the whole project unprofitable.

Technical experts within our charity assess that the costs associated with the gauge clearance in Ardley tunnel and the re-signalling required appear underestimated and should be revisited and benchmarked against similar scheme costs.

3 There is insufficient analysis of the cumulative impact of the scheme

More analysis is required to understand the cumulative impact of this scheme alongside others proposed in the region. There are other numerous and large proposals for development within this vicinity, namely:

- 9,000 plus dwellings to be added to the Upper Heyford development ;
- The “Baynard’s Green” XXL logistics proposal put forward by Albion Land for warehousing on the other side of the M40 and just north of Junction 10 and to the west of the A43 (ref: 21/03267/OUT);
- Warehousing between Stoke Lyne, Cherwell Valley Services, the A43 and almost to Tusmore Estate, put forward by Tritax Symmetry Ardley Ltd (ref: 22/01340/OUT); and

- The Puy du Fou theme park, between Bucknell village and Stoke wood, estimated to attract 1.4 million visitors a year (ref: 25/02232/OUT)

The scale of development in this area is escalating without a cohesive strategy or oversight of the cumulative impacts. We therefore call on the Inspector to address this.

The overall cumulative adverse impact on the environment, traffic, infrastructure and services will only increase as further speculative developments come forward in a policy vacuum, as the district currently lacks an up-to-date Local Plan and cannot demonstrate a five-year housing land supply.

We have grave concerns that the current designation of the Cherwell Council, where large developments are now decided at Inspector level, will only exacerbate this problem.

The applicants themselves identify there will be significant negative impacts from this SFRI scheme alone, both during construction and operation in relation to landscape, visual impact and the loss of agricultural land. The cumulative impact of these additional proposals will be catastrophic for our countryside and wildlife. This proposal, plus the potential for the other major projects, would also take a huge area of otherwise productive farmland out of use, a major food security issue.

The water supply companies have already stated that they cannot supply water or deal with the sewage for the warehouse proposals for Albion Land and Tritax Symmetry, so their ability to provide additionally for this SFRI seems highly unlikely.

It is concerning that land which is at present open countryside, essential productive farming and ancient villages between Upper Heyford and the M40 would almost certainly be covered in warehousing if this SFRI and the two other warehouse proposals proceed.

4 Measures proposed to mitigate the impact on nearby road congestion are insufficient

A significant failing for this site is its distance to the nearest major settlement. Bicester is nearly 5 miles away. With only a limited public transport timetable to Ardley, this development will be heavily car dependant. CPRE Oxfordshire consider the design of the nearest motorway junction (M40 Junction 10) that will service this development as inadequate.

This will only be exacerbated if the two road freight warehouses which we refer to in point 3 above are successful at appeal.

We highlight that a previous Planning Inspector refused Tritax Symmetry's application for an exception site during the inspection of the current Cherwell District Council Local Plan. The reasoning was because the B4100 road would not be able to take the increase in traffic arising from the proposed housing and increased employment in Bicester plus commuters and HGVs for the scheme. Additionally, the seasonality and timings of events and shows at the proposed Puy du Fou theme park must be assessed in the cumulative traffic impact. During the summer period when the shows are staged, most traffic will be accessing that site though Junction 10 of the M40 and the already often gridlocked B4100.

The increase in commuting travel by employees to this site, alongside the proposed haulier traffic, will also create significant traffic related harm to local communities such as significant noise, pollution, and congestion, which is inconsistent with tackling climate change.

5 The loss of countryside and the environmental harm of this development in unacceptable

The existing site is used for agriculture. Despite flagging the need at a previous consultation stage, we can find no evaluation within the consultation documents of the economic benefits of the site continuing to be used for agriculture. Quite apart from suiting the current skill mix of the local population, given the global position regarding food production, there is an increasing need for the UK to retain its arable land for food production. There is no detail provided on measures which would mitigate the loss of 'Best and Most Versatile Land'.

There are also highly significant shortcomings in the Environmental Assessment. CPRE Oxfordshire strongly concur with all the concerns raised by the ecologist at Cherwell District Council and call for these to be addressed:

- Lack of strategy for mitigating the impacts on a Site of Special Scientific Interest (SSSI).
- Shortcomings and inaccuracies in the assessment of veteran trees and ancient woodland.
- No assessment of the indirect impact on ancient woodland, such as noise and changes to landscape.
- Suitability of the proposed "hop overs" for bats.
- Lighting proposals in relation to bats and skylarks.
- Inaccuracies and inconsistencies in the Biodiversity Net Gain (BNG) assessment.
- No quantification of impact for the loss of irreplaceable habitat, in a BNG assessment which currently only marginally meets the minimum requirement of a 10% gain.
- No assessment of the delayed impact of creating new habitats in the BNG assessment, which again only marginally meets the minimum requirement of a 10% gain.

In addition to environmental concerns, we would like to raise concerns in relation to Heritage. The illustrated proposed screening, including by a bund proposed to mitigate impact on a nearby listed dwelling appears inadequate.

We concur with the view given in the summary section of the response from Cherwell District Council that for this SRFI *"there is potential that collectively, the sum of all the harms may outweigh the gains that may be forthcoming."*

In conclusion, CPRE Oxfordshire register our interest in this application and consider it inappropriate based on the issues we raise above.

Yours faithfully,

Lynda Moore
Planning coordinator
lyndam@cpreoxon.org.uk