



Oxford Strategic Rail Freight Interchange –
Statutory Public Consultation

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County Hall
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By e-mail only to: consultation@oxsrfi.co.uk

Date: 03/11/2025

Dear Sir/ Madam

England's Economic Heartland Written Representation – Oxfordshire Strategic Rail Freight Interchange (OxSRFI) Statutory Public Consultation

Please accept this as England Economic Heartland (EEH) response to the public consultation on **Oxfordshire Strategic Rail Freight Interchange (OxSRFI)**

England's Economic Heartland (EEH) is the sub-national transport body (STB) covering the region from Swindon and Oxfordshire in the west through to Cambridgeshire and Hertfordshire in the east. Our geography covers the entirety of the Oxford-Cambridge Growth Corridor. Our membership consists of the local transport and highways authorities across the region.

EEH does not routinely respond to individual planning applications, however have a key role in responding to NSIP developments, especially when a development is likely to have cross-border/regional-level transport impact. In addition EEH represents our Local Authorities with network rail, especially in development of future of rail lines.

The proposed Oxfordshire Strategic Rail Freight Interchange (OxSRFI)

The proposed intermodal rail terminal with new connections to Chiltern Main Line as part of the Strategic Rail Freight Network represents a key economic opportunity: it will be a significant asset and contributor to the UK economy. Under policy 34 of our Regional Transport Strategy, EEH *"will support the development of Strategic Rail Freight Interchanges where they support the ambitions of this strategy and their impact on the transport network can be suitably managed"*.

Alongside the SRFI including warehousing, the proposal includes a series of highway infrastructure improvements. These include motorway construction works to M40 Junction 10; alterations to A43 trunk road; Ardley bypass; Heyford Park Line Road; Middleton Stoney Relief

Road; access routes and improvements to Junction 9 of the M40, alongside improvements to sustainable travel infrastructure and connections to Bicester.

Location of the SRFI

The proposed site is adjacent to the Chiltern Main Line between Bicester North and Kings Sutton, south of Aynho Junction. It is also 1.6km southwest of M40 Junction 10 close to the A34 and A43 trunk roads – key road infrastructure for the Solent to Midlands freight flow.

It would be helpful to understand what market(s) OxSRFI is targeting to be able to comment on the location of the SRFI in terms of railway network connections. The applicant suggests that the Chiltern Main Line is part of the Strategic Rail Freight Network. However, Chiltern Main Line is not part of the core freight network. The Rail Report identifies it as a diversionary route for core strategic rail freight routes at Banbury and West London, for example as a diversionary route for West Coast Main Line. Gauging surveys have been undertaken between London and Banbury – which reflects part of the M40 corridor geography.

The proposed location does not naturally support moving freight to rail. The main freight flow through this area is Southampton to the West Midlands. A joint Network Rail and National Highways Multi-Modal Freight Strategy (2021)¹ identified that the rail freight flow runs through the Strategic Route Section Didcot to Oxford to Coventry South (not via Bicester). It is the Didcot – Oxford – Coventry routing for freight growth which is supported by the EEH Regional Transport Strategy policy 32: *"We will work with Network Rail and all relevant Sub-national Transport Bodies to develop proposals that increase freight on the rail network with priority given to the following corridors...Southampton to West Midlands"*.

Shifting road freight to rail freight along this corridor could support a decrease in HGV traffic on the A34. However, if the focus is not this freight flow and is supporting a different routing, this risks encouraging additional HGVs onto an already congested part of the road network. Under EEH Regional Transport Strategy policy 35: *"We will work with Highways England, local highway authorities, local planning authorities and the freight sector to ensure that strategic corridors for road freight and logistics are fit for purpose: priority will be given to the following corridors:...the A34 and M40 north of Oxford"*.

Existing Solent – Midlands rail freight runs via the Cherwell Valley Line. With no direct route between the OxSRFI site and the Cherwell Valley Line from the south, any proposed freight service would be required to reverse at Banbury. This would be more resource intensive, whether topped and tailed with two locomotives or running around at Banbury with one locomotive. There could also be significant capacity impacts for passenger and other freight services at Banbury. To open up robust new flows connecting OxSRFI with the Cherwell Valley Line (Midlands – Solent) would require other infrastructure interventions.

Network Rail have undertaken a Capacity Analysis Study, which identified four compliant return paths per day: 3 between Ardley and Crewe; and 1 between Ardley and Wembley Yard, along with other potential paths. It would be helpful to understand whether Crewe Basford Hall has been selected because the applicant has aspirations to use this as a node for onward connections to ports and other SRFIs, as well as what these onward connections are envisaged to be. In addition, it would be helpful to understand how this number of compliant return paths compares with other existing SRFIs, as well as a comparison of relative floor space between them. EEH is also concerned about the impact of rail freight on the passenger services on the Chiltern Main Line.

A further report by PRA suggests there may be other paths available in the future, which are currently used for construction of HS2. This includes paths southwards towards Wembley and Eastleigh – however, these would require use of already very congested rail corridors,

¹ [Solent to the Midlands Multimodal Freight Strategy - Phase 1, June 2021](#)



including the Great Western Main Line, Chiltern Main Line and North London Line. Flat crossing moves are proposed at West Ealing and Hanwell Junctions. The flat move from the Chiltern Main Line to Greenford Branch via Ruislip Gardens Junction and South Ruislip is also likely to present significant capacity and reliability challenges. Given the current and future demands on this routing (which includes the Elizabeth Line), it would be helpful to understand the likelihood of additional freight paths being added to the timetable and the trade-off this might require with the performance resilience of the existing services.

The pathing report which provides the evidence base for the proposed paths to the terminal is based on the May 2025 timetable. The applicant should clarify whether this includes consideration of future demands (committed or potential) on network capacity.

The proposals will be progressed using Network Rail's "PACE" governance, in line with other SRFI schemes. EEH seeks assurance from the applicant that the scheme will reach an appropriate stage ahead of an application being made under the DCO process. Given the core function of an SRFI is to serve rail freight, it is critical that further capacity analysis and network performance modelling is undertaken to ensure that the SRFI is in an operationally optimum location.

It is helpful to see the Alternative Sites Assessment, and the methodology used in site identification. The proposed site does not appear to be listed on the 'long list' of potential sites, or the resultant 'short list'. It would be helpful to have the proposed site as a comparator in the sifting process table and supporting high-level rationale.

M40 Junction 10

EEH recognises that there are existing capacity constraints at Junction 10 M40, which will be exacerbated by the cumulative impact of other strategic development proposals within the vicinity. Under policy 24 of Regional Transport Strategy, EEH "*will support investment in the Strategic Road Network and Major Road Network where this meets one or more of the following criteria and is consistent with wider environmental objectives:...(c) enables access to new economic opportunities and/or housing growth*".

There is a significant amount of development proposed in the local area with cumulative effects likely to impact the capacity at M40 Junction 10. The need for works at this junction and on the surrounding roads has been identified by a Transport Working Group for the development, which includes National Highways, Oxfordshire County Council and Cherwell District Council. The proposals include:

- Increase capacity and congestion relief of M40 Junction 10,
- Link from the M40 northbound to Padbury Junction for A43 northbound traffic,
- Works at the Padbury, Cherwell, Ardley and Baynard's Green roundabouts,
- New bridges over the M40 and new loops at lower level,
- Relocating J10 northbound entry slip road,
- A43 widening between M40 Junction 10 and Barnard's Green roundabout.

The applicant proposes a number of highways improvements to accommodate the forecast increased trip demand. The Transport Assessment forecasts 14,043 two-way trips a day utilising M40 Junction 10, of which 4,920 are HGV. This is a significant portion of the 16,547 two-way external vehicle trip generation forecast for the site overall with Travel Plan mitigations targeting only 68% single occupancy vehicles. However, in the narrative it is estimated that this only represents 58% of the light vehicle trips associated with the main site – it is not clear where the remaining 42% are forecast to go. Approximately 1,000 car trips and 300 HGV trips are anticipated during both the morning and evening peaks.

It is to be welcomed that the applicant recognises that improving access to the SRN is necessary not only for mitigation of this development's impact on the road network, but as

part of the wider planned growth and development in the area. Further, the efforts to divert HGVs from local villages onto more suitable new roads is to be welcomed.

The applicant proposes a HGV Routing Strategy requiring all HGV traffic to access/egress the site via the Ardley Bypass and M40 Junction 10. This is forecast to be up to 4,920 two-way HGV trips per day. The routing strategy mirrors the current agreement between Oxfordshire County Council and the Viridor 'Ardley Energy from Waste facility' that routes all HGV traffic to Junction 10 for access onto the M40. Restrictions would be put in place to avoid HGVs travelling to/from the south via the B430, including physical height restriction and enforcement methodology.

Sustainable Transport – accessing the site by bus, cycling or walking

The applicant is targeting a mode share split of 68% single occupancy vehicles by year 5, alongside 20% car sharing, 8% public transport, and 4% walking and cycling. This represents a 26% reduction in single-occupancy car trips from the baseline position of 92% through encouraging car sharing (baseline 5%), active travel (baseline 3%) and public transport use (baseline 0%). It is not clear what assumptions sit behind the mode share targets for year 5 compared to year 1 opening, given the bulk of transport infrastructure mitigation is expected to be in-place ready for first occupation of the site.

On site, the applicant proposes secure cycle parking and facilities, such as showers, lockers and changing facilities, as well as dedicated bus stops and a mobility hub.

Off site, the applicant proposes developing a network of pedestrian and cycle facilities around the area to promote active travel between the site and principal settlements. This includes new and improved pedestrian and cycle routes, including public rights of way, giving links to Heyford Park, Ardley, Middleton Stoney and Bicester.

The site is near National Cycle Route (NCR) 51 or Varsity Way, which provides strategic cycling connectivity linking Oxford and Cambridge. EEH has been working with Sustrans to develop Varsity Way into a [high-quality greenway](#), to enhance active travel across the region by serving as a key leisure and tourism corridor and asset. It is recommended that improvements to better connect the site to the NCR 51 should be provided.

Additionally, the applicant proposes funding new and enhanced bus services to and from Heyford Park, Bicester and Banbury to enable sustainable access to the site, as well as bus stops on the Heyford Park Link Road, at the Ardley Energy from Waste site and within Middleton Stoney on B430. It is welcomed that the proposed diverted bus services connecting to Heyford Park and Bicester will have extended operating hours to enable shift-workers to utilise local bus connections in their commute. EEH encourages OxSRFI to engage early with operators to ensure these services can be implemented ready for first occupation of the site.

Current Proposals as amended

The development includes proposals for an intermodal rail freight terminal with direct connections to the Chiltern Main Line in both directions. It is envisaged that the terminal will be capable of accommodating a minimum of 4 trains of up to 775m length through provision of 5 sidings, each with the capability to receive trains directly from the main line. A head-shunt and additional sidings providing access to warehouse yards is also proposed, as well as container storage. This could be expanded in response to market demand.

The GBRf supporting statement suggests that the intermodal rail terminal would be able to accommodate 10-12 trains per day, with a four-hour turnaround. It is not clear how these assertions fit with the four compliant return paths found in Network Rail's Capacity Analysis Study. Clarity is needed from the applicant over the expected number of trains per day, with supporting modelling of available compliant pathing.



The calculations undertaken in appendix 3.33: Road Freight to Rail Freight HGV Mileage Saving are rudimentary in their assertion that 1,104 HGV trips will be replaced. It is reliant on 12 fully-loaded trains in its assumptions – and it is not clear that there is that level of available compliant pathing on the rail network to serve the OxSRFI site or the likelihood of maximum capacity loading of trains. Further, the rationale provided for the origin/destination assumptions is linked with existing SRFIs, but fails to take into account OxSRFI's proposed location or the main freight flows in this area. There is a need to qualify the viability of such destinations from OxSRFI with compliant train paths.

It is to be welcomed that the rail connections will be capable of being electrified in the future through passive provision in their design and construction. This aligns with EEH's regional transport strategy policy 3: *"We will support and plan for the decarbonisation of the rail network with priority given to securing...infill electrification schemes that enable electric haulage of rail freight services...[and] electrification of the Chiltern Main Line between Birmingham and London Marylebone"*.

With regard to rail access, the applicant proposes construction of east and west facing rail connections into the main site, including appropriate signalling. This would be accompanied by works to Ardley Tunnel to enable sufficient gauge clearance for freight trains (proposed at W8 gauge to enable standard shipping containers). It is notable that the gauging surveys have focused on the route between London and Banbury rather than Solent – Midlands, which is cleared to W10 (this allows for a standard height wagon used with a 9ft 6in height ISO container). Further, it would be helpful to clarify whether any other SRFIs are restricted to W8 gauge loading, especially if this site is targeting intermodal freight.

Alongside the rail freight terminal, the applicant proposes maximum warehouse development of 6.5million square foot footprint, not including mezzanine floorspace. It is to be welcomed that the development will provide secure HGV parking and driver welfare facilities, though this is limited to only those HGVs visiting the site. The PEIR makes reference to this being used by HGVs arriving early. It is not clear whether this secure parking and driver welfare facilities will be able to be used overnight or if it also includes HGV alternative fuel charging facilities.

Alongside the capacity concerns at M40 Junction 10, the applicant also highlights congestion at M40 Junction 9, as well as traffic issues in the nearby villages of Ardley and Middleton Stoney. The proposals include:

- Ardley Bypass – a new link road connecting SRFI site to M40 Jnc 10, diverting the current B430 including stopping up the existing B430 in part to remove north-south through-traffic from Ardley village. A new bridge would be constructed to divert Ardley Road over the new bypass, and the stopped-up section converted to a footway/cycleway. Another bridge would be required to cross over the railway and join a new roundabout providing site access. This bypass forms the primary access to the OxSRFI site.
- Heyford Park Link Road – replacing Upper Heyford Road between Camp Road and B430. This will also include new footway/cycleway and connections to new public rights of way. This Link Road forms part of the secondary access to the site, but access will be limited to buses/public transport, bikes, pedestrians and emergency vehicles.
- Middleton Stoney Relief Road – single carriageway road connecting B430 and Heyford Link Road with the B4030, and reducing the volume of traffic passing through the centre of Middleton Stone (predicted to be up to 31% reduction). This would also include new footways/cycleways, connections to new public rights of way, and new pedestrian crossing facilities.
- Increasing capacity for M40 northbound traffic on A34 approach to M40 Junction 9.

Landscaping and Earthworks for Biodiversity Net Gain

No comments



General Comments

The Transport Assessment is ongoing alongside the convening of a Transport Working Group of relevant consultee bodies. It is welcomed that this has been meeting since November 2020. However, the scope of the group (and the resulting Transport Assessment) appears to be limited to road-based considerations (including active travel and buses). It is not clear whether this group is being invited to comment on the rail access/connections considerations, in order to take a broader system view of all transport connected with the site. This is especially critical given that rail connectivity is the core purpose of an SRFI and there does not seem to be any assessment of the proposals impact on passenger services on the Chiltern Mainline.

It is recognised that the proposed Puy du Fou development has not been included within the cumulative effects assessment to date. EEH seeks assurance that, should the Puy du Fou planning application be successful, this will be included in considerations moving forward.

Construction is planned to be phased over a 7-year period. In setting out the programme, EEH would encourage early construction of the supporting road infrastructure, in order to minimise construction-related HGVs utilising local roads. It is welcomed that the Ardley Bypass is proposed to be built early and used by construction-related vehicles as soon as possible. Routing all heavy vehicles via M40 Junction 10 is a mirroring of the wider routing strategy for the site's operations.

The acknowledgement of proposals for a potential new station on the Chiltern Main Line at Ardley is welcomed. The applicant states that the SRFI as currently proposed would not conflict with a new station on the site of the former Ardley station closed in 1963. However, it should be noted that there are other major development proposals in the area, including Heyford Park, recently announced by HM Government's New Towns Taskforce as one of 12 new towns recommended for development. Subject to further work by other developers, Local Authorities, Network Rail and others, alternative locations for a new station may be identified. The applicant should continue to liaise with all relevant parties as and when proposals for a new station develop, such that all schemes in the area can be effectively integrated.

Yours faithfully,



Suzanne Winkels
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England's Economic Heartland