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[redacted]

13 October 2026

The Examining Authority
Oxfordshire Strategic Rail Freight Interchange
(TR050008)
The Planning Inspectorate
c/o QUADIENT
69 Buckingham Avenue
Slough
SL1 4PN

Our Ref: 5659

Dear Examining Authority

TR050008 – Oxfordshire Strategic Rail Freight Interchange – Moto Hospitality Limited ([redacted]) – Deadline 1 Written Representation

We act on behalf of Moto Hospitality Limited (Moto), the operator of Cherwell Valley Services at Junction 10 of the M40. Moto is an Affected Person and has been allocated Interested Party reference [redacted]. This Written Representation is submitted at Deadline 1 pursuant to the Rule 8 letter dated 8 October 2026 and develops the holding summary submitted on 18 September 2026.

Cherwell Valley Services performs an important road-safety function by providing opportunities for drivers, including HGV drivers, to stop, rest and access essential facilities. Safe and convenient access to and from the Services is therefore important to driver welfare and the safe operation of the strategic road network. The proposed highway arrangements should be assessed with that function in mind.

Moto does not object in principle to the Oxfordshire Strategic Rail Freight Interchange and recognises that it may generate additional commercial and HGV traffic in the area. Its concern is to ensure that the associated Junction 10 works do not adversely affect the safe and efficient operation of Cherwell Valley Services, including access and egress, HGV movements and abnormal or excessive queuing within the motorway service area (MSA). Moto also wishes to avoid unnecessary constraints on reasonable future expansion, particularly additional HGV capacity.

The following points draw on Eddisons' initial Transport Assessment review dated 12 October 2026, enclosed with this representation.

Alterations to existing MSA access arrangements

Eddisons identify that the proposed Junction 10 improvements would alter existing MSA movements, particularly traffic travelling from the Services to the A43 north, which would be re-routed via Ardley roundabout under the preferred option. Whilst the Applicant has explored capacity benefits, Eddisons have not identified an assessment of the specific operational consequences for the MSA.

Moto requests that the Applicant identify and explain the assessments undertaken of those consequences, including HGV access and egress (including abnormal loads), customer convenience, operational efficiency and service area attractiveness. The assessment should demonstrate that the changed arrangements would protect the safe and efficient operation of the Services and identify any mitigation or amendments required.

Increased journey times for MSA users

Eddisons' review of the Journey Time Assessment tables in Transport Assessment Part 8 identifies increases exceeding 100 seconds for some MSA movements. They indicate that these appear to arise from altered direct access arrangements, additional signal-controlled stop-lines along the MSA access route and the requirement to route via Ardley roundabout when travelling from the MSA to the A43 north.

Moto requests that the Applicant explain why these increased journey times are considered acceptable in terms of the MSA's operational performance, particularly for HGV traffic and customers travelling towards the A43 corridor. The response should address the MSA-specific consequences of the changed movements and any measures necessary to avoid or mitigate adverse operational effects.

Road safety concerns associated with MSA traffic

Eddisons refer to Problem 2.16 in the Stage 1 Road Safety Audit within Transport Assessment Part 10, Appendix 36 (Interim Road Safety Audit and Response Report), which identifies concerns relating to weaving, lane changing and driver hesitation associated with the access proposals.

Moto requests that the Applicant identify the evidence demonstrating that the proposed signing, lane markings and speed management measures sufficiently mitigate those concerns, particularly for HGV drivers, abnormal-load drivers and unfamiliar motorway users accessing the Services. The Applicant should explain how the audit concern has been addressed and what measures would be secured as part of the proposals.

MSA demand and operational resilience

Eddisons identify that the modelling principally assesses forecast peak-period operation, with the VISSIM Modelling Impact Assessment Report in Transport Assessment Part 10, Appendix 42, focusing on the AM and PM peaks. Their review raises the need to consider whether those periods adequately capture MSA demand, including the lunchtime inter-peak and seasonal peaks, and whether the Services can function satisfactorily under a wider range of conditions.

Moto requests that the Applicant identify any assessments of the resilience of MSA access and egress during the lunchtime inter-peak, seasonal peaks, abnormal traffic conditions associated with incidents, and temporary restrictions arising from construction phasing. The Applicant should also

explain what surveys, calibration checks and validation exercises were undertaken specifically for Cherwell Valley Services and how it has verified that MSA traffic and HGV demand have been assessed robustly.

Where the existing assessment does not adequately address those conditions, Moto requests that the necessary further assessment be undertaken and any resulting mitigation or safeguards identified. Network-level capacity benefits should be considered alongside these specific operational matters.

Freight growth and future HGV demand

Eddisons identify that the development would generate substantial additional HGV activity through Junction 10 and the surrounding network, but have not identified an assessment of the implications for the operational requirements of Cherwell Valley Services.

Moto requests that the Applicant explain whether foreseeable changes in MSA demand have been considered during construction and operation, having regard to the additional HGV activity generated by the SRFI and the national policy support for increased HGV parking provision identified by Eddisons. The Applicant should clarify whether the proposed on-site HGV parking and driver facilities would meet the development's operational needs, and whether any additional demand at Cherwell Valley Services has been allowed for.

This request is intended to establish whether foreseeable operational needs have been adequately considered. Moto's concern regarding reasonable future expansion, including additional HGV capacity, should be considered proportionately in that context; it is not an assertion of an entitlement to reserve unused junction capacity.

Operation during construction and phased highway works

Eddisons identify that the highway works would be delivered in phases and that substantial construction traffic would use Junction 10. Moto requires confidence that the Services can continue to operate safely and efficiently throughout the relevant construction and interim highway arrangements.

Moto requests that the Applicant identify whether a Cherwell Valley Services-specific construction access strategy has been prepared, and demonstrate how access, visibility, signing and operational performance would be maintained through all construction phases. Where those matters are addressed within wider construction documents, the Applicant should identify the relevant provisions and explain how they protect the Services. Any necessary additional safeguards should be identified and secured.

Requested examination action and further technical evidence

Moto respectfully requests that the Examining Authority seek clear responses from the Applicant to the six matters above, including identification of the supporting assessments and relevant document references. Where assessment gaps or operational risks are established, Moto seeks the further assessment, design amendments, mitigation or safeguards necessary to protect the safe and efficient operation of Cherwell Valley Services.

Smith Jenkins has contacted the Case Team to request confirmation that Moto may provide a supplementary highways technical note at Deadline 2 on 26 October 2026, developing the evidence on the matters raised in this representation. No response has been received at the date of this submission. Moto therefore respectfully requests the Examining Authority's agreement to that supplementary submission and does not assume that its acceptance has already been authorised.

Yours sincerely



Associate
Smith Jenkins Planning & Heritage

Enc.

BTG Eddisons Oxfordshire Strategic Rail Freight Interchange Development Consent Order Application - Transport Assessment Review on behalf of Moto Hospitality Limited - 12 October 2026

Moto Hospitality Limited - Cherwell Valley Services, M40 Junction 10 Bicester

Re: Oxfordshire Strategic Rail Freight Interchange Development Consent Order Application - Transport Assessment Review on behalf of Moto Hospitality Limited - 12 October 2026

Ref:	Issue / Risk to Moto:	Question:
01	**Alteration of Existing MSA Access Arrangements** - The proposed junction 10 improvements include the re-routing of existing MSA movements, particularly traffic travelling from the MSA to the A43 north which will be re-routed via Ardley roundabout under the preferred option. The capacity benefits of this have been explored by the applicant, however, no assessment has been identified of the specific operational consequences of altering the existing MSA access arrangements, including impacts on HGV access and egress (including abnormal loads), customer convenience, operational efficiency and service area attractiveness which would be a concern for Moto.	What assessments have been undertaken of the specific operational consequences of altering the existing MSA access arrangements, including impacts on HGV access and egress (including for abnormal loads), customer convenience, operational efficiency of the service area, and service area attractiveness?
02	**Increase in Journey Times for MSA Users -** TA Part 8, Journey Time Assessment tables identify journey time increases in excess of 100 seconds for some MSA movements. These increases appear to arise from direct access arrangements being altered, additional signal controlled stop-lines along the MSA access route and traffic having to route via Ardley roundabout when travelling from the MSA to the A43 North.	Could the applicant set out the justification for why it is considered these increased journey times will not adversely affect the operational performance of the MSA, particularly for HGV traffic and customers travelling towards the A43 corridor?

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03	**Road Safety Audit Concerns Associated with MSA Traffic** – The Stage 1 Road Safety Audit - TA Part 10, Appendix 36 – Interim Road Safety Audit and Response Report, RSA Problem 2.16, identifies concerns with weaving, lane changing and driver hesitation associated with the access proposals.	Clarification - What evidence has been submitted to demonstrate that signage, lane markings, and speed management measures are sufficient to mitigate the weaving, lane-changing and driver hesitation issues identified by the Road Safety Audit, particularly for HGV drivers, abnormal load drivers and unfamiliar motorway users accessing the services?
04	**Lack of Dedicated MSA Operational Assessment -** The modelling primarily assesses forecast peak-period operation, with the VISSIM MODELLING Impact Assessment Report (Appendix 42 – TA Part 10) focused on the am and pm peaks. Services tend to be significantly busier during the inter peak and also can have seasonal peaks. Services must also function under a wider range of conditions than those typically assessed in a transport model.	What assessments, if any, have been undertaken of the resilience of MSA access and egress arrangements during the lunchtime inter peak, seasonal peaks, abnormal traffic conditions (during incidents), and temporary restrictions due to the construction phasing? What surveys, calibration checks and validation exercises were undertaken specifically in relation to Cherwell Valley Services and how has the applicant verified that MSA traffic and HGV demand have been assessed in a robust scenario?
05	**Freight Growth and HGV Parking Demand** - The proposed development will generate substantial additional HGV activity through Junction 10 and the surrounding network. Whilst extensive modelling has been undertaken regarding freight movements and junction operation, we have not identified any assessment of the implications of that growth on the operational requirements of Cherwell Valley Services.	Has the applicant accounted for foreseeable changes in motorway service area demand, particularly given national policy support for increased HGV parking provision and increased HGV demand as a result of the SRFI, which is forecast to increased HGV use on the surrounding highway network, during both the construction and operational phases? Have Sensitivity Tests or Cherwell Valley Services operational assessments (such as HGV parking demand assessments) been undertaken accounting for

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		reasonably foreseeable growth in HGV demand at the motorway service area?
06	**Construction Phase Operation** - the proposed highway works will be undertaken in a phased approach and substantial construction traffic will utilise Junction 10.	Given the importance of Cherwell Valley Services to the strategic road network, has a Cherwell Valley Services-specific construction access strategy been prepared to demonstrate that access, visibility, signing and operational performance of the services will be maintained throughout all construction phases?

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