Representation for the Oxfordshire Strategic Rail Freight Interchange (SRFI) Development Consent Order

On behalf of Moto Hospitality Limited

Highways Note 01 – 22 October 2026 (5480.rep.01)

Introduction

1 BTG Eddisons is instructed to prepare and submit a highways representation to the Oxfordshire Strategic Rail Freight Interchange Development Consent Order (DCO). This representation is submitted on behalf of our client, Moto Hospitality Limited (hereafter referred to as 'Moto'). Moto is an Affected Person and has been allocated Interested Party reference [redacted].

2 At the time of writing, Moto's Deadline 1 representation (Reference: REP1-044) has been published on the examination library.

3 This representation seeks to expand on Moto's previous submission, providing a fuller review of the six matters previously identified.

Cherwell Valley Motorway Service Area - Site Location

4 Cherwell Valley Motorway Service Area (MSA) is operated by Moto and is located at Junction 10 of the M40. The MSA is located circa 2km to the north-east of the main SRFI site (the DCO Applicant's site).

5 Cherwell Valley MSA provides a vital, conveniently located services on the M40, enabling motorists to rest, recharge and refuel.

6 The MSA site access is located off Cherwell Roundabout (as detailed in the Applicant's Transport Assessment Part 1 of 11, Paragraph 3.9 (APP-192)).

7 The location of Cherwell Valley MSA is shown in **Figure 1** below:

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Figure 1 – Moto Cherwell Valley MSA – Site Location

8 As can be seen in Figure 1, the performance of Junction 10 is critical to the operation of Cherwell Valley MSA. The MSA is accessed off Cherwell Roundabout and the critical MSA movements are between the MSA and the M40 via the slip-roads.

9 The M40 southbound on-slip is located on Cherwell Roundabout accessed via a left-turn arrangement on the MSA site access. The M40 southbound off-slip feeds into the A43 Junction 10 roundabout before linking to Cherwell Roundabout for access to the Services.

10 The M40 northbound on-slip is accessed via Ardley roundabout on the western side of the M40 over the A43 motorway bridge. The M40 northbound off-slip also links to Ardley Roundabout with the route to the MSA travelling over the motorway bridge and linking to Cherwell Roundabout to access the MSA.

Policy Context

11 Guidance on the provision of roadside facilities for road users on motorways and all-purpose trunks roads in England is set out in the Department for Transport Circular 01/2022 'Strategic Road Network and the Delivery of Sustainable Development' (the Circular).

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12 In paragraph 4, the Circular states that the principal purpose of the Strategic Road Network (SRN) is to:

> *'...enable safe, reliable, predictable, efficient, often long distance, journeys of both people (whether as drivers or passengers) and goods in England between our:*
>
> - *main centres of population*
> - *major ports, airports and rail terminals*
> - *geographically peripheral regions of England and*
> - *chief cross-border routes to Scotland and Wales.'*

13 With reference to the assessment of development proposals, paragraph 52 of the Circular states:

> *'The scope and phasing of necessary transport improvements will normally be defined by the company* (National Highways) *in planning conditions that seek to manage development in line with the completion of these works. In such circumstances, modifications to the SRN must have regard to the need to future-proof the network, while its delivery may require a funding agreement between the development promoter and the company.'*

14 The general principles for Roadside Facilities are set out in paragraphs 71–73 of the Circular, which states:

> *'71. The primary function of roadside facilities is to support the safety and welfare of road users. Roadside facilities should be sympathetic to the character of the site and its surrounding area, and create a safe, inclusive and accessible environment. In most cases it is for the private sector to promote roadside facilities, although there may be a role for the company and local highway authorities to provide these where a need arises.'*
>
> *72. This section sets the government's policy on the provision of roadside facilities on or near to the SRN and their eligibility for signing, to enable installation of service signs prescribed in The Traffic Signs Regulation and General Directions 2016 ("the TSRGD") or its replacement.*
>
> *73. All roadside facilities that are accessed directly from a motorway or motorway junction must be signed for safety reasons. As such, new or improved facilities must meet the requirements for signing as set out in table 1 of Annex A. The operation of all signed roadside facilities will be the subject of a legal agreement between the company and operator of these facilities.'*

15 On the matter of spacing of general roadside facilities, the document states at paragraphs 74 to 78 that:

> *'74. Roadside facilities perform an important safety function by providing opportunities for the travelling public to stop and take a break during their journey. Government advice is that motorists should stop and take a break of at least 15 minutes every 2 hours.*

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75. The network of signed roadside facilities on the SRN is intended to provide opportunities to stop at intervals of approximately half an hour. However, the timing is not prescriptive as travel between services may take longer on congested parts of the SRN.'

76. On this basis, the maximum distance between signed motorway service areas should be 28 miles. Speed limits on the SRN vary and therefore, applying the same principles, the maximum distance between signed services on APTRs should be the equivalent of 30 minutes driving time.

77. The distance between services can be shorter, but to protect the safety and operation of the SRN, the access/egress arrangements of facilities must comply with the design requirements in the DMRB, which includes provisions in respect of junction separation. The installation of the latest technology to enable a reduction of carbon emissions should also be a consideration for reduced spacing between services.

78. In determining applications for new or improved sites, local planning authorities should not need to consider the merits of spacing between different facilities, for safety reasons, as informed by the maximum recommended distances set out above.'

16 With regards to the spacing of freight facilities, paragraphs 80 states that:

'80. It is recognised that on certain parts of the SRN and at certain times a shortage of parking facilities for HGVs can make it difficult for drivers to find safe space to stop and adhere to requirements for mandatory breaks and rests. To alleviate the shortage, the expansion of existing facilities on the SRN is likely to be needed alongside the creation of new parking sites.'

17 The document continues to provide additional guidance on freight facilities in paragraphs 81 and 82, as per the below:

'81. In areas where there is an identified need footnote 26, the Company will work with relevant local planning authorities to ensure that local plan allocations and planning application decisions address the shortage of HGV parking on or near to the SRN. In these circumstances, local planning authorities should have regard to the following spacing requirements:

(i) the maximum distance between motorway facilities providing HGV parking (being service areas, rest areas or truckstops) should be no more than 14 miles; and

(ii) the maximum distance between APTR facilities providing HGV parking (being service areas or truckstops) should be the equivalent of 20 minutes driving time for HGVs.

82. Where the general spacing distances above are met but a need for HGV parking still arises, the company will support the case to address unmet demand, subject to an assessment of the safety of the proposed access or egress arrangements.'

18 The current spacing of Services on this section of the M40 is reliant on Cherwell Valley MSA to serve a gap between Warwick Services and Oxford Services, which would otherwise be in excess

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of 28 miles. To ensure highway safety on this section of the SRN is maintained and to facilitate compliant use of the SRN, it is of paramount importance that the highway works associated with the DCO at Junction 10 do not adversely affect the safe and efficient operation of Cherwell Valley MSA.

19 As will be discussed later in this note, the DCO should ensure that Cherwell Valley MSA is not adversely impacted by the proposals.

20 Moto does not object to the principle of the proposed SRFI development and acknowledges the Applicant's extensive transport assessment work. Moto also recognises that the proposed highway improvements are intended to improve the operation of the wider strategic highway network and accommodate forecast growth.

21 However, Moto remains concerned that the assessment has largely focused on strategic highway performance and has not presented sufficient evidence to demonstrate the operational consequences for Cherwell Valley MSA. Whilst the MSA site access is included within the transport modelling scope, the assessment does not adequately demonstrate that the service area can continue to operate safely and efficiently in either the construction or operational phases of the proposed development. Accordingly, Moto requests further clarification in relation to the following matters.

Issue 1 – Alteration to Existing MSA Access Arrangements

22 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 ingress and egress (including abnormal loads), customer convenience, operational efficiency and Service Area attractiveness, which is of concern for Moto.

23 Moto remains concerned that the proposed highway arrangements would alter existing routes between the MSA and the wider strategic road network, including movements towards the A43 northbound via Ardley Roundabout. Whilst the Applicant has assessed the operation of the proposed highway network, it is unclear what proportion of existing MSA traffic would be impacted by these changes and whether particular user groups would experience disproportionate impacts.

24 Of particular concern is the absence of evidence demonstrating that the revised arrangements can safely and effectively accommodate abnormal load movements. Moto has not identified any swept-path assessments or route-tracking analysis confirming that abnormal loads currently able to access and depart the MSA would continue to do so without constraint under the proposed highway layout.

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25 Moto therefore seeks further evidence identifying the volume and proportion of MSA traffic affected by the revised routing arrangements, together with abnormal load tracking and swept-path analysis demonstrating that the operational functionality and accessibility of the MSA would be maintained. If this evidence cannot be provided at this stage, Moto considers that detailed design should be developed in consultation with Moto prior to finalisation of the Junction 10 arrangements.

Issue 2 - Increase in Journey Times for MSA Users

26 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.

27 Moto's concern is not simply the increase in journey times itself, but the absence of clear evidence demonstrating the resulting effects on MSA accessibility. There is a risk that the introduction of new signalised arrangements along the MSA access routes could constrain the free flow of traffic to and from the MSA in both the construction and operational phases of the proposals.

28 Moto has not identified any assessment quantifying what proportion of MSA-related trips would be affected by increases in journey time and whether the impacts would be experienced by a significant share of MSA users.

29 Moto therefore seeks clarification of the proportion of MSA trips affected by increased journey times and evidence demonstrating that the proposed signal optimisation and traffic management measures would minimise delays and maintain the operational accessibility of the MSA. This is to ensure that access to and from the service area is not materially disadvantaged, including during the construction phase.

Issue 3 - Road Safety Audit Concerns Associated with MSA Traffic

30 Moto notes that the Applicant has relied on an Interim Road Safety Audit, which identifies concerns relating to weaving, lane changing, driver hesitation and the accommodation of abnormal load movements (TA Part 10, Appendix 36 – Interim Road Safety Audit and Response Report, RSA Problem 2.16). These issues are directly relevant to HGV traffic and vehicles accessing and exiting Cherwell Valley MSA.

31 Given that these concerns remain identified by the auditor, Moto questions why a full Stage 1 Road Safety Audit, together with a National Highways review and subsequent Designer's response, has not yet been provided at this stage. Without this information, it is not possible to determine whether the identified safety issues have been satisfactorily addressed.

32 Moto is particularly concerned by the lack of evidence demonstrating that abnormal load movements can be accommodated safely and that weaving and lane-changing movements

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associated with HGV access to and from the MSA will not create operational or safety issues. Moto therefore seeks publication of the full Stage 1 RSA and a breakdown of the evidence showing how these identified concerns have been resolved.

Issue 4 - Lack of Dedicated MSA Operational Assessment

33 The modelling primarily assesses forecast peak-period operation, with the VISSIM Modelling Impact Assessment Report (Appendix 42 – TA Part 10) focussing on the AM and PM peaks. However, MSAs can be busier during the inter-peak or at weekends and no evidence has been identified that shows how the assessment ensures a robust consideration of the MSA access for all potential peak periods. Services must also function under a wider range of conditions than those typically assessed in a transport model and seasonal peaks can also be relevant to the safe operation of an MSA.

34 Moto has not identified any inter-peak, weekend or seasonal assessments or traffic flow reviews to demonstrate how the proposed highway arrangements would operate during periods when the MSA is likely to experience its highest levels of use.

35 Moto therefore seeks evidence demonstrating that the assessment has considered appropriately robust conditions and that access to and from the MSA would continue to operate effectively during periods of peak MSA activity, including inter-peak, weekend and seasonal traffic conditions.

Issue 5 - Freight Growth and HGV Parking Demand

36 The proposed development will generate substantial additional HGV activity through Junction 10 and the local highway network, although it is noted that the Applicant confirms many of these trips are considered existing movements on the wider SRN. Whilst extensive modelling has been undertaken regarding freight movements and junction operation, assessment of the implications that traffic growth may have on the operational requirements of Cherwell Valley MSA has not been identified.

37 Given the location and function of Cherwell Valley MSA, it is reasonable to expect that some new trips associated with the SRFI will utilise the MSA for rest breaks, refuelling and other driver welfare facilities.

38 Moto has not identified any evidence demonstrating that a potential increase in trips to the MSA, including HGV demand, has been considered within the Applicant's assessments. It is unclear whether the likely use of Cherwell Valley Services by SRFI-associated traffic has been assessed or whether any operational implications have been identified.

39 Moto therefore seeks evidence demonstrating that the reasonably foreseeable use of Cherwell Valley MSA, associated with the SRFI, has been considered and that any resulting impacts on the operation of the MSA have been appropriately assessed.

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Issue 6 - Construction Phase Operation

40 The proposed highway works will be undertaken in a phased approach and construction traffic will also utilise Junction 10.

41 Moto notes that the Applicant has prepared a construction phasing strategy and associated traffic management proposals. However, it is not clear that the specific operational requirements of the MSA have been considered in detail.

42 Moto is concerned that traffic management measures introduced to maintain the efficient operation of the SRN during construction could adversely impact and constrain access to the MSA.

43 Moto has not identified any MSA-specific assessment demonstrating that these impacts have been considered or that access to and from the Service Area will be maintained to level as to not adversely impact on the MSA throughout the construction period.

44 Moto therefore seeks confirmation that the needs of the MSA have been fully considered within the construction phasing strategy and the Construction Traffic Management Plan. This should include consultation with Moto and the continued safe and convenient access throughout the works, appropriate temporary signing and wayfinding measures, and advance notice of any traffic management changes that could affect the operation of the MSA.

Conclusion

45 Moto does not dispute the Applicant's conclusions regarding the strategic benefits of the highway improvements or the ability of the wider network to accommodate forecast development traffic.

46 Nevertheless, the Applicant's own assessment demonstrates that:

- MSA access arrangements will be altered;
- certain MSA movements will be rerouted;
- journey times for some MSA users will increase;
- the assessments do not appear to cover the typical peak periods associated with a MSA (the inter-peak and the weekend peak). It is therefore questioned whether the MSA operation has been robustly assessed;
- the assessments do not appear to consider any increase in HGV use at the services resulting from the development proposals despite an identified increase in HGV traffic on the immediate local highway network;
- road safety auditors have identified concerns relating specifically to traffic accessing the services, including HGVs and abnormal load use.

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47 Moto invites the Applicant to provide further evidence demonstrating that the MSA can continue to operate safely, efficiently and resiliently throughout both construction and operation phases of the Proposed Development and to identify any necessary mitigation, monitoring or safeguards required to secure that outcome.

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Summary Note

Introduction

1 BTG Eddisons represents Moto Hospitality Limited, an affected person, in relation to the Oxfordshire Strategic Rail Freight Interchange DCO and expands on six previously identified highways matters.

1 – Alteration to Existing MSA Access Arrangements

2 Re-routing may affect HGVs, abnormal loads and customer convenience. Moto seeks an analysis of the proportion of MSA traffic impacted by the proposals, swept-path evidence and potential consultation on detailed design.

2 - Increase in Journey Times for MSA Users

3 Some journey times to the MSA increase by over 100 seconds. Moto requests the affected trip proportion and assurance that proposed signal timing optimisation and traffic management will minimise delay.

3 - Road Safety Audit Concerns Associated with MSA Traffic

4 The interim road safety audit identifies weaving, lane-changing, hesitation and abnormal-load concerns. Moto seeks the full Stage 1 RSA, National Highways review and evidence of resolution.

4 - Lack of Dedicated MSA Operational Assessment

5 The junction modelling omits MSA peaks. Consideration of inter-peaks, weekend and seasonal assessments are requested to confirm that the impact on the MSA has been robustly considered.

5 - Freight Growth and HGV Parking Demand

6 SRFI freight traffic may increase demand for rest, refuelling and welfare facilities at the MSA. Moto seeks assessment of foreseeable MSA use and resulting operational effects.

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6 - Construction Phase Operation

7 Construction phasing and traffic management must maintain safe, convenient MSA access. Moto seeks reassurance that the operation of the MSA will not be prejudiced during the construction phases.

Conclusion

8 Moto does not oppose the SRFI in principle, but requests additional evidence, and potential mitigation, monitoring and safeguards confirming that Cherwell Valley MSA will remain safe, efficient and resilient during construction and operation.

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