Planning Inspectorate
Arolygiaeth Gynllunio

Hearing Transcript

Project:	Oxfordshire Strategic Rail Freight Interchange
Hearing:	Transcript of issue specific hearing 3 (ISH3) - part 1
Date:	11 November 2026

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Transcript_OxfordRail_ISH3_SESSION1_111026

Wed, Nov 11, 2026 9:30AM • 1:14:44

Speaker 1
Good morning, everybody. It's now 930, and it's time for this hearing to begin. So I'd like to start by welcoming you all to this issue-specific three hearing for the Oxfordshire Strategic Rail Fred Interchange Project. I'm judging, and I think everybody can hear me, which is which is good. And can I just check with mr. Sheared that the live streaming has commenced? Thank you very much. My name is Adrian Hunter, and I've been appointed by the Secretary of State to the lead member of this panel to examine this application. Just before I carry on with some introductory remarks, I'm just going to ask the rest of the panel if they could just introduce themselves, please.

Speaker 2
Good morning. My name is Alex Oyebade. I'm a chartered transport planner and have been appointed by the Secretary of State to be a member of the panel to examine this application.

Speaker 3
Good morning, everyone. My name is Guy Rigby. I'm a chartered civil engineer, and I've also been appointed by the Secretary of State to be a member of the panel to examine this application.

Speaker 1
Thank you, both. Together, we constitute the examining authority for this application. We're also supported by other members of the Planning Inspectorate, some of whom I suspect you've probably met on your way in. Our case manager is Matthew Sheard, and he's supported by mrs. Donnelly's and mr. Willie McSporen, and they can be found at the back of the room. So, if you do have any questions, please ask. Just want to run through some housekeeping matters. Just bear with me for those people who perhaps were here yesterday. It might sound familiar, but I just need to go through them for for people who perhaps weren't in attendance yesterday. I start by asking, making sure that all devices are turned to silence. That we're helpful. Toilets and amenities are located at either end of this corridor. We're not expecting a fire alarm today. We had a practice yesterday, so if it does go off today, I've been assured it is the it is the real thing. And the way that we exit the building is again along the corridor, out the doors at either end, and then we congregate in the car park. In terms of the logistics for today, the hearing will follow the agenda that was published on our website on the third of November. The examination library reference of that is EV 02005, and it will probably be helpful if you do have a copy in front of you as we progress through the day. The agenda is for guidance only, and we may add other considerations or issues as we progress. But the hearing will be very much a structured discussion, which I and other members of the panel will lead based on that published agenda. We'll conclude the hearing as soon as all relevant contributions have been made and all questions asked and responded to, but if discussions can't be concluded today, then it may be necessary for us to either prioritise matters or leave them to further written questions. It is, however, important that we get the right answers to the questions we are going to ask. Therefore, I would remind you that the examination process is predominantly a written one, so if you are unable to give the answer to the question, or do require additional time to get the information requested, rather than giving a restricted or potentially wrong answer, in the interest of the smoother in the examination, please indicate that you will need to respond in writing, and we can then defer the question to our next written questions or a later hearing if required. In terms of timings today, we're conscious that today is the 11th of the 11th. So what we're

going to suggest is that we take a break, probably about 10 to 11. So that anybody who does want to observe the minutes, the two-minute silence, we can do that at 11 o'clock. So that that's certainly our programme. That at 10 to 11, we we will take a break regardless of of where we are in the agenda. Probably look to adjourn for lunch about 1o'clock and take an hour, and then we'll have a mid-afternoon break as well, and an appropriate point can run to about 5o'clock today, and that's our aim. However, we do have the room till about six, if needs be. But I think our aim is to sort of try and wrap everything up by sort of five or just after then, if we possibly can. Does anybody have any questions on what I've just outlined? No, excellent. Thank you very much. Today's hearing is being taken in a hybrid way, which means some of you are present with us in the venue, and others are joining us online using Microsoft Teams. However, you have decided to participate today will ensure that you are given a fair opportunity. A recording of today's hearing will be made available on the project page of our website as soon as possible after the close of the hearing. A transcript will also be made available. So, with that in mind, every time you speak, please can you ensure you do clearly into the microphone and stating your name and who you represent. If you're not at the table, there's a roving microphone at the back. Or alternatively, if there is space at the table, more than happy for you to sort of come forward and and make your points.

Speaker 1
Those joining virtually, should you wish to speak again, please use the hands up function in Teams, and please then wait to be invited to speak. If you're attending virtually and you don't want your image recorded, by all means, you can switch on. Your camera, but also please note that the chant function and other functions in Teams aren't being monitored. A link to the planning inspector's privacy notice was provided in the notification for this hearing, and we assume that everybody has familiarised themselves with this document, which establishes how the personal data of our customers is handled in accordance with the principles set out in data protection laws. Again, any questions on what you need to be putting in the public domain? Please speak to the the case team, and they'll be happy to help about that. Does anybody have any questions on on how what I've just outlined there? No. Excellent. In terms of the purpose for today, it is very much for the exec to examine the information submitted by the applicant and also by interested parties and others, this issue-specific hearing is is being held to explore a number of matters orally in respect of various environmental matters, and also we'll be discussing matters about the development consent, the draft development consent order as well. Just turning to the agenda, if I could, we have had a couple of requests in terms of items on on the agenda and possibly moving things around. The first matter was from the Environment Agency, where they've asked if it is possible to bring item 3.7, which is water environment, further up the agenda to do after the the PFAS issue. The reason being is we understand that there's another DCR inquiry going on. Not surprisingly, given the amount they're going, and they're required this afternoon to attend that. So we we think that actually moving water environments up to do after the PFAS would would be a logical thing to do if that's okay. But before we confirm that, can I just check with the applicant and other parties? Would that would be okay with you,

Speaker 4
Alexander Booth. For the applicant, yes. So we were forewarned about that. That's entirely acceptable for us.

Speaker 1
Thank you. Okay, could just check with the council as well that that's okay to do that.

Speaker 5
I think that works for us as well. Thank you.

Speaker 1
Great. Thank you very much. So so that's that's what we're doing. Then once we've done PFAS water environment, we'll then go back to the running order of transport, minerals, etc., and run through it that way. There was also a request, I think, from Sherwell District Council with regards to ecology as well, and making sure that's done in the afternoon. I think we're fairly confident that it will be the afternoon by the by the time we get to that. But if it looks like we are racing through the agenda, we'll we'll keep that under review. But I suspect it will be this afternoon, anyway. By the time we by the time we come to that, just like to reassure everybody that we are familiar with the documents that have already been sent in. So, when answering any questions, you do not need to repeat in length something that has already been submitted. But if you do want to refer to information that has been submitted, it is really helpful to us if we could have the appropriate PINS examination library reference. This is a public public event. Therefore, if you haven't indicated you wish to speak, but if there are points that you do wish to make, please feel free to sort of indicate at the appointing time, and we will we will come to you. We'll conclude the hearing as soon as all relevant contributions have been made and all questions have been asked, have been responded to. We are have a mindful that the agenda is is quite full one. So if it looks like discussions can't be concluded today, then we may decide to prioritise certain matters and defer others to either later examination or to written questions. But again, we'll keep this under review as we we go through the day. Does anybody have any questions about the agenda or the procedural side of today's hearing. No, great, thank you. I'm now just going to move on to introductions. If I could, so when I state your organisation's name, if you could just introduce yourself and and identify how you would like to be addressed as well, whether Miss, Misses, or Miss. So if I could start with the applicant, please.

Speaker 4
Good morning, Sir Alexander Booth, King's Counsel. I appear on behalf of the applicant, Oxfordshire Rail Freight Limited, and I am instructed by Ms. Laura Beth Hutton of Evershed Solicitors, who is sat immediately to my right. So, given the breadth of matters that ISH three is addressing, we've got quite a large team, obviously, and I'm not proposing to introduce all members of the team now. I'm just going to introduce those who are sat immediately with me and who will be contributing in respect of the first agenda item under item three, 3.1, the PFAS matter. So, as I say, sir, to my immediate right is Ms Hutton. To her right is mr. Rory O'Reilly of the applicant. To his right is mr. Steve Harley of Oxalis Planning. And to mr. Harley's right is mr. Richard Robinson of BWB. So that's the team for now. Albeit others are going to step forward at various points during the day. And so I'm content to be addressed as mr. He and so on.

Speaker 1
Thank you, and we'll give time for you to swap your teams, and probably the same for the council as well when we when we. Through through items, thank you very much. So, if I could start with that, or sorry, move on to the council, please.

Speaker 5
Thank you. My name is mr. George Gurney. I'm the lead strategic planner for NCIPs at Ulster County Council. I think I'm going to take a similar approach to the applicant and introduce specialists as we get to that item in the agenda.

Speaker 1
Yes, that's fine. Thank you very much. If I could now move on to National Highways, please.

Speaker 6

My name is mrs. Vicky Fowler. I'm a partner and solicitor at Gowling WLG, and I'm joined to my left by mr. Jeremy Bloom, third-party DCO lead for National Highways. So we're in attendance for items 3.2 transport and for the DCO information. Thank you.

Speaker 1
Thank you very much. I also realised that in doing the council, I completely forgot and washed over Cherwell District Council. So my apologies for that.

Speaker 7
Good morning, sir. My name is Nick Wyck. I'm Central Area Team Leader at Terrell District Council, and I'm joined by Sean Fleet, who's also Fellow Planner, and Neil Whitson, who works in environmental protection.

Speaker 1
Thank you, and apologies for for missing you out the first time round. And then, if I can then move to the Environment Agency, who I think are joining us virtually.

Speaker 8
Good morning. My name is mr. Alex Hazel. I'm the planning lead for the Environment Agency's involvement in the DCO process for this project. With me today, I've got a number of specialists who will be contributing at the relevant time on agenda items 3.1, 3.7, and we're also interested in item four. So those specialists that I have with me are Susie Bateson, groundwater and contaminated land specialist; Lucy Houghton, water quality specialist; and Sean Holland, flood risk specialist. Thank you.

Speaker 1
Morning. Thank you very much for that. If I could now move on to the interested parties that I've got registered, so I've got two representatives from the Gallos Brook Group.

Speaker 9
Good morning. I'm Ms. Helen Christie, and to my left is Ms. Charlotte Harris, and we represent the Gallows Brook Environmental campaign group, and we campaign on water pollution issues in the local Hayford Park area.

Speaker 1
Good morning, thank you very much. If I could then move on to Jo Davies from Smith and Son. So I think if she is joining us, she's online.

Speaker 6
Yes, I'm here. I'm here. I'm planning and estates manager for Smith and Sons Bletchington, a local quarrying company.

Speaker 1
Thank you. Good morning. Next on my list is mr. Callum McGough.

Speaker 10
Good morning, sir. mr. Callum McGough from Motion Consultants Limited. I'm appearing on behalf of Value Retail, the operators of Bicester Village, and we will be speaking on item 3.2 transport.

Speaker 1

Good morning. Thank you very much. I have mr. James Stewart Irvine again from, I think he's joining us online. He represents Biffa?

Speaker 11
Yeah. Good morning, sir. Yeah, James Stewart Irvin. I'm planning manager at Biffa, and we're here to because of our interest in the Ardley Investor Composting Facility. So we'll be speaking in relation to item 3.4. I would just say, unfortunately, I have to leave by 430. Unfortunately.

Speaker 1
Yeah. Thank you. We've been forewarned that, and again, we're hopeful that, given where it is on the agenda, we'll do that. But we'll we'll be mindful of of your timing and and that sort of thing. So, thank you. Yeah,

Speaker 11
that's great. Thanks.

Speaker 1
And then I have mr. Philip Norstrand. Good

Speaker 12
morning. morning. My name is mr. Philip Nostrand, and I am the founder of Stop the Trojan Horse, a local community group.

Speaker 1
Good morning. I have mr. Martin Lipson as well. I think there's a rubbing mic that might come round. That means that you don't have to you don't have to get up and move if you don't want. Thank

Speaker 7
you. Good morning. My name is mr. Martin Lipson. I'm the chair of the Mid Cherwell Neighbourhood Plan Forum, and I'm hoping to speak on 3.2 transport, on ecology, and on palaeontology if we get there by the end of the day,

Speaker 1
hopefully we will. And then finally, I have mr. Richard Allen.

Speaker 3
Good morning. My name is Richard Allen. I'm hoping to speak on the BISTA transport. Model and its failings.

Speaker 1
Thank you very much. Is there anybody else who wishes to speak that I've not included within my introductions? Seeing anybody in the room and nobody online. Excellent. For those persons joining online, you may switch your cameras and microphones off if you're not specifically participating in the discussion. And as already mentioned, if you do want to participate, please use the raise hand function. For those in the room, around the room, please sort of acknowledge and sort of raise your hand. I'm sure one of the panel members will sort of notice that, and we'll come to you as and when we have the time. Does anybody have any questions or comments on the introductory remarks I've done before we move on to the next item on the agenda? No, excellent. If that's the case, then I will move on to agenda item three and pass over to mr. Rigby.

Speaker 11
Thank you,

Speaker 3
mr. Hunter. So the first part of item three relates to per and polyfluoroalka substances (PFAS) . Under this item, I've got questions for the applicants, and I'll invite responses from the statutory parties, Cherbourg District Council and the Environment Agency. And I also would like to hear from Helen Christie and Charles Harris for Gallus Brooke, and from Philip Nordstrand. And then I'll invite the applicant to respond. This subject was considered at ISH two at agenda item 3.4, and we've considered all the post-hearing and the other deadline one submissions. Today, I want to consider further information we've received, and in particular, the representations from Charlotte Harris and from Gallus Brooke, which are similar and which both contain useful information chiefly relating to the Gallus Brook and to the former Upper Hereford Air Base, and also the applicant's appendix 11.11, the PFAS contamination technical note, which introduces new testing information into the examination relating to the application site, and during this item, I may also refer to the applicant's responses to our first written questions, particularly, oh sorry, anti-written representations. I've got the library references here. That was all, and also I'm interested and may refer to the Environment Agency about provision of further information and comments, including its ratings of where it sees we are at the moment. So, I've got Charles Harrison, Helen Christie from Gallusbrook, Philip Nordstrand, Sean Fleet from Tribewell District Council, and Alex Hazel and Susie Bateson from the Environment Agency, who are online. Excuse me a minute. Just to open, at the last hearing, the applicant commented that the new information, which we've now received at deadline two, will be submitted into the examination as part of its change application, but that's conflating two separate issues and may of course confusion. So just to be clear, as we said yesterday, the PFAS issue is being examined by the XA as part of the current application, not as part of any proposed change. So moving on to the resin testing by the applicant, the applicant's appendix 11 point 11 at Rep 201 four PFAS contamination technical note, and I quote, sets out details of additional surface and groundwater sampling and testing undertaken on the proposed Oxfordshire Strategic Welfare Interchange main site to establish whether per and polyfluoroalka substances (PFAS) are present on site. The applicant's intention is that the PFAS assessment, once complete, is ultimately incorporated into the application material, in other words into the examination, so I've got three quick additional questions for the applicants. Gallosbrook, in its relevant representation, says we are also confused as to how. This water testing can have been undertaken on the site in summer 2026, as all streams appear to have dried up in the drought. This would make a full controlled waters assessment impossible. So perhaps you could tell us: Do you intend to? Could you, if you could explain that, and also tell us if you intend to undertake any testing adjacent to an outside domain site, and also when you envisage your assessment being complete, hopefully join this examination to give parties an application, an opportunity to to comment. So, first off, if you could explain how you managed to undertake the assessment when the streams appear to have dried up. Secondly, do you need to do any testing adjacent to and outside the main site, and thirdly, when you envisage your assessment being complete, so to the applicant, please.

Speaker 4
Thank you very much, Sir Alexander Booth, on behalf of the applicant. Then, just to confirm, in relation to the matters, that first question addresses it's a question of how was surface water testing undertaken during the dry conditions this summer? Is it intended that testing be undertaken outside of the main site? And thirdly, when does the applicant anticipate that all material tests will have been undertaken. Is that right?

Speaker 3
Yes, certainly. I'm very

Speaker 4
grateful. That's right. That's right. Yeah. I'm going to hand to mr. Robinson in a moment to address the detail of the testing that's been undertaken together with mr. Harley. Just as a preliminary point, I mean, I am aware that yesterday much was said, understandably, at the open floor hearing about PFAS and local concerns regarding the same suggestion, being in part at least that the applicant hadn't undertaken testing or appropriate testing. So we do say, and this is by way of overarching observation, that whilst we understand the concern of local communities in that regard, that the fact or the suggestion rather that we've not undertaken appropriate testing is a is we say a fundamental misconception. We have undertaken comprehensive and invasive survey testing, both in respect of groundwater, surface water, silt, sediment, and so on, and so we do say that we are approaching this topic comprehensively. In terms of the testing that's been undertaken, I'm going to ask mr. Harley and mr. Robinson to speak to those three specific issues, which you've identified as being wrapped up in your first question.

Speaker 13
Thank you, Steve Harley, for the applicant. Just just before Richard answers your your first more technical questions, just a point of clarification in terms of the status of submitted materials, sir, because you you mentioned in your introductory remarks the change application, our technical note that you referred to, ES Appendix 11 Point 11, which is the new PFAS contamination technical note, that that is in the examination library is a deadline two submission, sir. So that you've been that's been given reference REP two Rep two dash zero 14. So my understanding, sir, is that you've accepted that document, and that formally forms part of the examination. Now that that's in there, that's not in the same category as some of the change application documents that I know are yet to be formally accepted into the examination. I just wanted to make that distinction because I I think that's that's correct. Before we move on,

Speaker 3
thank you.

Speaker 14
Richard Robinson, for the applicant, to address the three questions posed one by one. If I can start with the sampling and the flow conditions at the site, is correct that the the rivers are or have been in low flow conditions during the summer, during the dry months. However, not they aren't completely dry. There's still pockets of standing water, which are fairly regular, which we've been able to sample. But that's also why some of the sampling includes silt sampling as well, parts of the stream that that have dried up, we've obtained silt samples so we can understand whether there is impact in in the watercourses running through our site. To discuss.

Speaker 3
Yeah, briefly, does that mean that you would retest at the sites where the water was standing rather than its normal flow condition? Would you think you need to test there again under relatively normal conditions?

Speaker 14
There will be the intention to to retest in in the future to understand the the situation. Our target was to understand whether the Hayford site was impacting on the watercourses running through our site and how it impacts on our development and the construction process, and the risk to our site, whether that be site site users or ecosystems.

Speaker 3
Yes, I understand you'll test in the future. That would be presumably normal practice. I was just wondering whether, given the very dry conditions, you would want to be sure that your assessment was correct compared with the previous five summers, which have been very wet. We

Speaker 14
we don't have any intentions to retest immediately. I understand the the situation. We are looking at the material and what's being done on the Hayford site as well, which is a big part of us understanding our site and what's happening on it. Low flow conditions is likely to lead to higher concentrations in in the water rather than than lower, and actually the silt in our site is is the main thing. The water is conveyed through our site, so coming from higher up, there's there's only so much that we we can do on our development with that that we want to understand what the impact in that water is, but that the main thing is that sill because that is on our site and that will be disturbed during our works, and so that will be tested further down the line. So we understand and can risk assess that that material.

Speaker 3
Thanks.

Speaker 4
Just very briefly, and just to pick up before mr. Robinson turns to item two and item three. To be clear, the applicant's position is that whilst, well, we're not clear, but whilst it's potentially suggested by third parties, that the dry conditions this summer mean that the testing that we've undertaken might be less reliable. We take the directly contrary view because lower flows lead to higher concentrations, and it's the silt and sediment that mr. Robinson's referred to, which is the key

Speaker 1
consideration in the context of this side. Thank you. Can I just, if I could, I think one of the things I think I'd stress is that our role here is to make a recommendation to the Secretary of State based on the evidence that we have in front of us. So, if you're saying there may be some retesting, and there may be, and I think there may be questions or issues that are being raised in terms of the validity of the report. I understand what we've just heard there that actually your position, but I think we've got to balance those things up. So, if there is the opportunity to retest, then you know, given given the length of time that can be examination, is that an option?

Speaker 14
Just to add to that, from the material that has been submitted to date, further testing has been undertaken on Padbury Brook, the the brook along the north of the site, which we'd not had access to to do previously, and that that was only about three weeks ago now. So that that will be added to the technical notes and submitted at deadline three.

Speaker 4
So, mr. Robinson's indicated that there is further testing that's been done. The result of which is not yet before you and will be at deadline three, as you've just heard. In terms of the suggestion that we might do further testing, so we're going to take that away, and we'll look to come back to you on that point.

Speaker 1
That felt helpful. I think you understand the position that you know we've got to present the evidence that we've got. We've got to come to a position for the Secretary of State in terms of the robust evidence in front of us, so yeah, anything that that can help us is is enormous help, and I suspect it might even help other parties as well. Perhaps.

Speaker 4
Thank you, sir. That's understood.

Speaker 14
To move on to the second point regarding testing. Sorry. I

Speaker 3
give your name again. Sorry, each time you speak. Thank

Speaker 14
you, Richard Robinson, on behalf of the applicant. On the additional testing outside of our site, we don't propose to undertake any testing downstream of our site. Our main concern is the source of the PFAS and how it impacts on our site. There is no benefit to this application for for doing testing. Certainly, down downstream of our site, we have been reviewing the information that's being put into the public domain on Hayford itself. So that is of most relevance to us, other than the testing that we are doing,

Speaker 4
Sir Alexander Booth, on behalf of the applicant. I mean, the further point that I think we'd want to make in that context is that whilst we are aware of significant concentrations of PFAS outside of our site and on the Hayford site, as the examination is aware, on the basis of the testing that we've already undertaken, evidence of PFAS on our site is very considerably more limited. And whilst we understand local concerns and we understand that in the wider locality, there are significant concentrations. There is no evidence that that is the position on our site. Quite to the contrary, the extensive testing that's been undertaken demonstrates that concentrations on our site are very low. I don't know if that's a further point that mr. Robinson would like to comment on briefly.

Speaker 14
Richard Robinson for the applicant. Yeah, just to reiterate, we are looking at the impact that we have on site compared to the the source and the surrounding watercourses. Certainly, Gallos Brook is impacted much more significantly than our site. We are assessing the concentrations that we have found on our site, and considering the potential for for future impact from from Hayford, and that's not completely being disregarded. And it's how that is in context to with the work that would be done on our site and the the receptors on our site and the conveyance of of that water.

Speaker 3
Thank you. And the third point, please.

Speaker 4
Just remind mr. Robinson that the third point raised by the panel was in relation was essentially the question of when it's anticipated that the applicant would have concluded all testing that it proposes to do in relation to PFAS. I think so. To some degree, mr. Hunter's already queried whether or not further testing might be undertaken by the applicant. We've indicated that we're going to take that away and give it further consideration. So this answer must necessarily be provisional to some degree. But, mr. Robinson, I can ask you to confirm when you anticipate that all the testing and survey work that we propose to put before the examination would be concluded. I think that's strongly your point.

Speaker 14

So, just reiterate the the testing that we've undertaken to date. There is more that will be submitted at deadline three, and further testing for the application. We'll take that away and discuss doing that for a future submission.

Speaker 4
So, so to confirm, all the testing we've undertaken to date some of which is not yet before the examination. All the results of all of that work will be before the examination at deadline three. We've indicated that, further to mr. Hunter's indication, we may and we're going to consider whether or not further testing might be undertaken in different water conditions, for example, and we'll have to come back to you as to when, well, if that testing is to be undertaken, if further survey work is to be undertaken, when that would be provided, and we'll look to provide you with a timetable for that in the event that we determine it would be appropriate to undertake further testing. Thank you, sir.

Speaker 3
Thanks. That's very useful. My main concern is to ensure that whatever's put into the examination, there's sufficient time for people to respond and you to be able to respond in respect of the response, so that we're not squashed up against the end of the examination.

Speaker 4
Alexander with the applicant. Yes, that's entirely understood. There's. Absolutely no utility in us parachuting material in at the 11th hour when other parties don't have a chance to consider and make representations, and we do not have an opportunity to respond to those. So that's entirely understood, and we can promise you that that's not going to be the situation at the examination.

Speaker 3
Thank you. Next, the examining authority notes from the applicant's appendix 11 point 11 that PFAS have been used in firefighting foams, particularly those designed to tackle fuel fires. The specific local context and information or data, which has led to questions and some concerns about the potential for numerous local watercourses to potentially contain notable levels of PFAS, and that testing for PFAS is, in many respects, a new and emerging environmental and regulatory issue. It was not proposed or requested for inclusion in the environmental statement for this project by any consultees or in the scoping opinion from the Secretary of State. The XA also notes from the applicant's appendix 11.11 that the local concern regarding PFAS, understood to have derived from activities at the former RAF Upper Heyford, primarily the known use of fire retardant foams containing PFAS when the airfield was operational and which remain in the environment, that the Environment Agency has published data obtained from the Galois Brook, 2.8 kilometres south of the main site, and that testing has been commissioned by Upper Hereford Community Action Group from a tributary of Galois Brook, approximately 200 metres west of the main site, where high levels of PFAS have been recorded. So, just to the applicant, if there's anything you want to comment on in respect to those findings that you had in your appendix, and just to summarise your view in respect of that.

Speaker 4
So, Alexander Booth, on behalf of the applicant, I'm going to turn to mr. Robinson again in a moment for the substantive detail. Just to say, by way of overarching comment, I mean the examination, sorry, the XA is absolutely right. This matter or this topic, this issue was not scoped in by the Secretary of State in terms of the environmental assessment undertaken. Once the issue was brought to our attention. We say the applicant has responded rapidly, comprehensively, and responsibly in terms of the work undertaken to assess the presence or otherwise of PFAS and assess risk. It's right to say that testing and survey for PFAS is not; it's not a long-standing contaminant in the sense of it's being understood for many decades, such as others are. It currently falls to be addressed pursuant to

guidance and process that mr. Robinson will speak to in a moment. And we say that we are essentially observing best and appropriate practice in relation to how to address the issue, but I don't know, mr. Robinson, what else you'd wish to say in that context, and what you might point to in terms of how PFAS falls to be considered under what regime and time.

Speaker 14
mr. Robinson, for the applicant to concur with mr. Booth and the statements already made, we have reacted to additional evidence and information made available to us, and the significant concerns, rather than a localised source, on the Heyford Air Base, so the work we have undertaken is to better understand the impact on our site and the local environment.

Speaker 3
Thank you. I'd like to pass over to other parties now to respond to what they've heard. I'd like to start with Charlotte Harris and Helen Christie, who provided a considerable amount of information into the examination from the Gallus Brook. Thank you.

Speaker 9
And good morning, Helen Christie. On behalf of Gallusbrook Campaign, our view is that since streams significantly contaminated with PFAS are flowing through the site, the development is likely to cause deterioration of these streams. This could render the decision to grant consent unlawful under the water framework framework. Directive regulations. Given the scientific uncertainty over the extent of the contamination, the precautionary principle should be exercised when deciding on consent for the development. PFAS chemicals are highly toxic and linked to a range of serious health conditions, including cancer, immune suppression, liver and thyroid damage, high cholesterol, and developmental issues in children. PFOS and PFOA, two types of PFAS, are banned worldwide and classed as carcinogenic in the UK. And they are also classed as persistent organic pollutants. PFOS is classed as a priority hazardous substance under the Water Framework Directive, people living near PFAS hotspots tend to have elevated levels of PFAS in their blood. Recent examples in the UK include Bentham and Thornton Cleves. A cohort study by Law et al. published in the 2024 Journal of Cancer Epidemiology found increased rates of certain cancers in three Australian communities with environmental exposure to PFAS from military firefighting foams. The site of former RAF Upper Hayford, now known as Hayford Park, is directly adjacent to the rail freight development site to the west. PFAS does not respect site boundaries, and the rail freight development site and Hayford Park should not be considered separate sites in terms of mapping the plume of contamination. Extremely high levels of PFAS contamination have recently been discovered across the Hayford Park site in soil, groundwater, and surface water. Ground and water condition reports by Stantec and Smith Grant Consultants were uploaded to the Cherokee District Council Planning Portal on the 26th of the 10th, 26, as part of the application 25 forward slash 02190 hybrid to redevelop the site and build 9,000 homes. The principal source of the contamination is the fire training area on the flying field, where the levels of PFOS found in one soil sample from the fire training area in July 2026 was 4,052 micrograms per kilogramme, which is 312 times over the Clare soil screening value of 13 micrograms per kilogramme for residential use, according to consultant Smith Grant. This is the highest ever recorded level of PFOS in UK soil, 11 times higher than the highest reading from the Angus Fire Factory site in Bentham. There are other potential contamination hotspots on the site, such as the multiple hangars, where it is likely automatic fire suppression systems were regularly discharged as part of routine maintenance, and also the refuelling hot pit and several crash sites. Groundwater in multiple boreholes across the Hayford Park site was found by Stantec consultants to be highly contaminated with PFAS. Extremely high levels of PFAS have been found in nine streams flowing from the former RAF Upper Hayford base by the Environment Agency and environmental consultants Stantec, BWB, and Subadra. The contaminant linkage pathway for PFAS that covers both sites, both the Hayford Park site and the

Oxfordshire Rail Freight Interchange Development site, is the migration from the source contamination from A triple F firefighting foams used historically on the flying field through soil, groundwater, and surface water, which is being significantly polluted. PFAS contamination is migrating from the Heyford Park site to the Oxfordshire Rail Freight Interchange site through soil, surface water, groundwater, and sediment, which have all been found to contain elevated PFAS levels. The chemical signature of this PFAS, in particular, is PFAS dominant and is consistent with A triple F bombs used on in military firefighting. Two contaminated streams, one a tributary of the Padbury Brook and two tributaries of the Gagel Brook, one of which is referred to the Ashgrove Brook, flow through the Oxfordshire rail freight development site. Testing by the applicant in Appendix 11.11 has shown significant levels of PFAS ranging from 80 to 320 nanograms per litre of PFOS found in the Ashgrove Brook. These levels are all hundreds of times above the statutory annual average environmental quality standard for PFOS of 0.65 nanograms per litre. The Padbury brick was not tested by the applicant, even though it should have been recognised as being potentially contaminated. We have commissioned a test by Subadra Consulting on the Padbury Brook at Kennel Cotts, which contained 68.4 nanograms. Per litre of PFAS and 297 nanograms per litre of total PFAS.

Speaker 9
There are a further two outfalls that have not been tested. According to the Forever Pollution Project, a level of 10 nanograms per litre of PFAS or above is considered a hotspot, and these levels are considerably above that. The tributaries of the Padbury Brook and the Gaigle Brook are classified as a fail on chemical status, according to the European Court of Justice Vasa case on the interpretation of the Water Framework Directive as enshrined in English law by the Water Environment Water Framework Directive England and Wales Regulations 2017. Any deterioration in quality elements, such as a measurable increase in PFOS concentration caused by the project, is an unlawful deterioration. UK authorities have a legal duty to improve the status of water bodies. The potential for an unlawful deterioration is a material consideration in the granting of consent in this case. The Court of Appeal in the Pickering Fishery case recently confirmed that the WFD was binding in English law on public authorities. The applicant must therefore therefore prove in its Water Framework Directive assessment, Chapter 9, Appendix 9.5 of the environmental statement, that the construction of the Oxfordshire rail freight interchange will not increase PFOS contamination in local surface water bodies. This document currently makes no reference to either PFAS or PFOS. It is tempting and possibly expedient to compare the levels of PFAS found on the Oxfordshire Rail Freight Interchange site to those at Heyford Park and conclude that they are not that serious because they are lower than the catastrophic levels found in the Galois Brook. This would be wrong because the levels on the Oxfordshire Rail Freight Interchange site are still significantly above the EQS for PFOS. It is also specious to compare samples taken at different times of the year when water levels and concentrations are completely different. The recent drought has made it impossible to carry out a full controlled water assessment at the site. In fact, some of the water is still not flowing, particularly in the Padbury Brook. An extreme caution should be taken when analysing the applicant's sampling results, as a full mapping of the PFAS bloom in soil, ground, and surface water has not been carried out. Groundworks for the Oxfordshire rail freight interchange, including mass excavation, deep piling, and cut and fill, risk disturbing PFAS contamination and increasing the migration of contamination into deeper soil, groundwater, and surface water, thereby causing surface water quality to deteriorate. The public and site workers are at direct risk of exposure from contamination associated with the construction and groundworks. The Padbury Brick tributary is known to flood properties in the village of Fuquat, with water potentially contaminated with PFAS. The flooding here was so severe in 2024 that people had to leave their homes and businesses for months. This is documented in the parish council records. The Ashgrove Brook, or also known as the Gagel Brook, is known to flood properties in Chesterton with water potentially contaminated with PFAS. The off-site flooding downstream of the proposed development does not appear to have been properly considered in the applicant's preliminary environment information report, Chapter Water Environment Document 6.9. Culverting and building on top of streams, as is planned for both streams

at this site, generally increases the risk of flooding both up and downstream, and is discouraged by the Environment Agency. This is even more of a risk when the streams are contaminated. Disturbing the PFAS contamination on site risks flushing it further down through the hydrological catchment of the Gagel Brick that is linked to the Otmoor site of special scientific interest, which has special legal safeguards against environmental damage. According to the National Network Plan, according to the National Network National Policy Statement 2024, paragraph 5.156. Applicants should ensure that any necessary investigations are undertaken in accordance with the land contamination risk management guidance. And paragraph 5.159 sets out the options for remediation. The precautionary principle is enshrined in UK law and places the burden on the developer of the contaminated site to prove that it can be made safe. The principle should be invoked where there is scientific uncertainty about the risks of contamination. According to Chapter 17, Policy 2 of the National Planning Policy Framework, the applicant must demonstrate that the land can be made suitable for its future use. Sorry, I don't

Speaker 1
like to interrupt because I know. Can tell me how much longer you've got to go because I've just

Speaker 9
got one more page.

Speaker 1
That's that's probably more than I want to be frankly honest. What I'd like to, if you could really summarise that, because actually we'd like to probably hear the applicant's response, but it may well be that there's so much detail in there that I'm not sure it's going to be beneficial for. The applicant to respond at this moment in time, and I suspect, and I don't want to put words in in in the mouth of a KC that that's never a job I'll ever want to do. But I think they'll probably want to take it away and and whatever. So I was going to say, if you could summarise and then submit all of that to us in writing, because that carries exactly the same weight as everything you are saying to us. I want to reassure you of that, and that can then mean the applicant can then take that away and properly consider that. I think because there's there's a lot of really helpful, important stuff that you're referring us to, and I think we really do need the applicant's response to that. But I think I prefer the applicant's proper response to that rather than something that they may well not be able to respond to properly. So if if I could ask you to to summarise that, what you've got left.

Speaker 9
Summarise my last bit. Okay, so basically, because the source of the contamination or the primary source is off-site, it's going to be incredibly difficult for the applicant to control the remediation, or impossible and the imposition of any Grampian-style conditions on the consent order will be beyond the applicant's control, and just to say that remediation of the Hayford Park site is going to be incredibly costly, if not impossible, with similar sites in the U.S. spending at least 96 million dollars to date, such as the Wordsmith Air Force Base in Michigan, and remediation of the Hayford Park site, the primary source of contamination, is contingent on that site being granted planning permission, which may not actually happen, and the whole site may, in fact, be mothballed, as in the case of Dunsfold Park in Surrey. And the remediation may actually never happen, which will mean it will be impossible to remediate the contamination at the rail freight interchange site. Also, as that is, this is dependent on what is happening at the Hayford Park site. That's in essence the rest of my page.

Speaker 1
Thank you, and I appreciate that. And apologies for I think, like I said, the deadline for submissions of everything else is the 26th, 20 sorry, 24th of November. But if you can speak to Casey, if need any help, get all that information to us. That'd be that'd be enormously enormously helpful to us.

Speaker 3
Thank you very much. Before I pass to the applicant, I'd like to hear from the other parties and then invite you to respond at the end of this sub item, if that's okay with yourselves. So next, I'd like to ask Philip Nordstrom if he has anything he wishes to add to what Galois Brooke have just said. I don't want a repeat of anything we've heard, but if there's anything you wish to add that you would like to, particularly in in response to what the applicant said earlier.

Speaker 12
Thank you. I would like to respond to what the applicant said earlier. We are sitting here today examining a nationally significant infrastructure project, which I understand the applicant has been working on since at least 2018, and according to the applicant's information, has spent over 25 million pounds preparing, and yet we are sitting in a situation. We're in a situation where the application was filed with the planning inspectorate for examination without any consideration of the PFAS issue, in spite of PFAS having been suspected as a contaminant of the airport site since at least 2025, I have to correct what was said previously that this contamination was not known. I mean, perhaps the applicant preferred not to know about it. I don't know, but in the local community, it was suspected; it was well known that old airfields could have PFAS contamination. But there was no consideration of that. The only reason that we are discussing PFAS contamination is because of the work of the Gallisbrook Group, the the excellent work that they have been doing, and then during the examination, the applicant has been running behind and trying to has been trying to remedy these fundamental deficiencies of the application. This is a fundamental issue where the original application had no consideration of it. It's so, in fact, the issue is so fundamental that it's it's item number one on today's agenda. So, these omit these omissions by the applicant raise fundamental questions about the fairness of the examination process. The ability to examine the evidence and and and to reach solid conclusions about PFAS presence, remediation, and and so on. And I frankly I don't think that these deficiencies are capable of being remedied within the context of this examination. What would now be proper would be for the applicant to withdraw the application, remedy all deficiencies relating to PFAS investigation and remediation, and then resubmit their application once these fundamental deficiencies have been addressed. Thank you.

Speaker 3
Thank you very much, mr. Ostrand. Before I hear from the applicant, I'd next like to hear from Chalwell District Council, please, if they have any comments to make on what's been said so far.

Speaker 15
Neil Witten, Cherwell District Council, Environment Protection. As I think you said, there was a lot of information given there. We'd like to have a look at the written submission. Is there any specific questions that you would like to to add.

Speaker 3
No, it was more a case of wanting to know how any progress is going in any at us that affects yourselves, and in the context of what we've just heard, is there anything you want to say at this point? If there's anything, as mr. Hunter said earlier, we'd like we'd like to have the right answer. So if you don't want to say anything now, you're quite at liberty to put it in the posting submission.

Speaker 15
I think I'd probably prefer that.

Speaker 3

Thanks very much. And next on to the Environment Agency, please. And I think are online.

Speaker 8
Alex Hazel for the Environment

Speaker 3
Agency.

Speaker 8
Yes, sorry, sir. Alex Hazel for the Environment Agency. I'd like to bring in my water quality and groundwater and contaminated land specialists where relevant for this, please. I can see Susie Bateson is on the screen now. Thank you.

Speaker 3
Thank you.

Speaker 16
Yeah, Susie Bateson for the Environment Agency. I'm a groundwater and contaminated land specialist. There are two strands to my comments. We are aware of the Environment Agency involvement with the wider testing, alongside Chowell District Council in relation to the Hayford Park site, and we are linking in with the teams and individuals in the wider EA that are coordinating this work. I'm also liaising with the with my groundwater and contaminated land colleagues in the area team that is responding to the Heyford Park application to get an understanding of the the wider situation, however, we do have to look at the controlled water impacts of the Oxford scheme on its own merits. And to this end, I've reviewed the recent submission of the Appendix 11 Point 11 PFAS Contamination Technical note rep 2014, and I will provide written comments at the next deadline. The document goes some way to present an overview of the situation. We would like some additional information to be presented, though. This includes the borehole logs so that we can understand the horizons that were targeted during the groundwater testing, and we also request the inclusion of a conceptual site model to demonstrate the applicant's understanding of the groundwater situation at the site, and this will help us make a decision regarding the proposed way forward presented by the applicant, and to be comfortable that the controls proposed in the DCO are sufficient. The matter of managing and remediating contamination from an offsite source needs to be considered only when the the source of the PFAS contamination has been fully established.

Speaker 3
Thank you very much indeed. So I'd like now to.

Speaker 11
Sorry, I think

Speaker 3
we have a little time left. I would like to pass back to the applicant to make any response you'd like to at this point in anything that's been said.

Speaker 4
So I'll look to be as brief as I can. Alexander Booth, on behalf of the applicant, so we've noted what the EA has just said in terms of its understanding of our document 1111 2014, and we note also the further information it is suggesting that we supply in terms of borehole logs and so on, and we'll take that away. And look to engage with them. We note also what's said by CDC, rather mr. Whitten's holding

response, and the fact that he wishes to understand or better understand the issues raised by the other parties. So I don't propose to respond now to either of those. That leaves the representations made by mr. Nordstrand and the Galasbrook campaign. Firstly, as regards mr. Nordstrand, I mean, quite simply, so we don't accept in any way that there is, how can I put it, some deficiency in terms of the scrutiny which the examination is able to give to this issue, it's entirely appropriate, and we consider that it's nothing particularly out of the ordinary in that regard. In terms of what the Gallows Brooke campaign had to say, I'm I'm afraid, sir, mr. Hunter is right in that there was a very significant amount of detail in what we heard, and I can say before I pass to mr. Hardy. I mean, we don't accept. I'm afraid much of what's been said. So I I wouldn't want the XA or indeed the examination, the wider examination, to go away thinking that we accepted what has been said. We don't accept it, but so we are going to need to respond in writing, and once we receive the written summary following this hearing, we will look to respond to that in a suitable way. I think beyond that, though, I'm just going to pass to mr. Harley to see if there's anything further that he would wish to add by way of initial response at this point.

Speaker 13
Thank you, mr. Steve Harley, for the applicant. And there is clearly a lot there, but there was just a few a few points that jumped out. So I felt it was helpful to just hopefully come back as part of an initial response, and perhaps understandably. But there's clearly a tendency to lump this PFAS issue into one big discussion that everywhere is equally and terribly contaminated, and clearly there are some very elevated levels seen through the data produced by the Gallusbrook and their good work from the EA. And we hope that our testing adds to that wider understanding of of PFAS in the area. But I think, from my fairly non-technical understanding, it would be wrong to fall into the trap of of assuming that, and there were sort of implied comments that the pathways from the Hayford, a Hayford Airfield site, to all other surrounding sites are in some way the same. Clearly, there are links and relationships, and those links and relations are explored in some depth in our submissive material at deadline too. But the the very different levels of PFAS seen on our site as compared to others, and by by different I mean considerably lower, does help give some sense of, and and the the report provides some analysis of the different relationships and pathways that exist between that source of the contamination and our site as compared to other sites or our watercourses within our site and other other watercourses. So I think that's really important. That's not to downplay it, and we understand there are legitimate concerns about it. That it's important that you understand the characteristics of our site and the levels found. and I talked a bit at Ice h2 about it, but to give a sense of the differences, the maximum total levels on our site are 0.39 micrograms per litre. That's the maximum levels found, versus levels of 42 to 43 micrograms seen in the Gallus Brook. So, yeah, you need to under we need to all understand those differences. And just a very specific point: I've talked there about micrograms. References were made in the verbal contribution to nanograms. So we also need to be very clear what units we're discussing and making sure that you and others, when we're when we're comparing contributions, are doing it in a in a comparable way. Just a few quick points for me. Reference to Padbury Brook was made. That's part of additional work that will be submitted at deadline three, which mr. Robinson referred to. So that testing has been undertaken, forms the latest sort of update. The Water Framework Directive, sir, has also been updated. There was reference to that; that was submitted at deadline too, and I think is awaiting acceptance as part of the wider change pack. Although actually, the updates to that document aren't specific to the changes made in the change application. They were updated in response to points by the EA more generally. There was a reference to our preliminary environmental report, so that that would date either from 2022 or 2025. Absolutely doesn't reflect the submitted application. The preliminary environmental report, so you'll be aware, is is a draft set of environmental statements we use to help inform consultation. So I would I'd dread to think anyone's relying on that as as some understanding of the application has made. And then just just finally on on the extent to which we may have sort of missed or deliberately overlooked PFAS. PFAS was first raised with us our awareness of the work by the Gallusbrook people, but also through discussions with the council earlier this year, and we swiftly moved to to test the site. I work on major sites across the country, so. We we we don't

uniformly. We may start to now, I suspect, but PFAS is not uniformly formed part of ground investigations. In fact, I understand that the lab capacity in the UK to actually test for PFAS until quite recently was very limited or lacking. So it wasn't. There's no conspiracy theory here. We've engaged positively in the very real local concerns, and we we say as mr. Booth has, we we we made a genuine contribution to a wider understanding and and to understand the risks specific to our site, but more to come in in writing, sir. Thank you.

Speaker 4
Yes. So, and just to tie up on that point, then, I mean, essentially, the three points I'd want to make is firstly, so we don't dispute the significance of PFAS as a contaminant. You've heard from the Galas book on that, and I don't think we dispute the significance of it. Certainly, we don't also we also do not dispute its presence in worrying concentrations in the wider locality. But the third point is this: we do respectfully but firmly disagree regarding the implications for this site and this development. I mean, that's the high-level position, sir. But beyond that, as mr. Harley says, we're going to need to come back in writing once we've seen the written summary of what it is that the Gallisbrook wish to put in? Thank you, sir.

Speaker 3
Thank you. Meantime, just thinking on that last point, Gallagher put submission in at deadline two. So, presumably, what's been said in there is quite a large submission. But what's said in there, you will be able to presumably respond to at deadline three anyway, and it's possible you may find that deals with the majority of what's been said this morning. Could be wrong, but at least we we will get you in sync for the response to deadline two submissions.

Speaker 4
Alexander Booth, the applicant. Yes, sir, that's absolutely right. Thank you.

Speaker 1
Just a minor point from me on the Water Framework Directive and the points that were raised. I see it has been updated, and I know we've we've got that. Again, I think it's a point you'll take away, but I think it's important as you'll be aware we have a responsibility on us in terms of the Water Framework Directive. So, if you could review what you've submitted to us in light of what you've got as well, so that we we have the the position that that you take on the Water Framework Directive, so that we can we can make the right recommendations as Secretary of State. There was a hand up I saw online, I think from somebody from the Environment Agency, but it seems to have gone down. I don't know the the point has been addressed.

Speaker 17
Yeah, thank you. Sorry, it's Lucy Harrison for the Environment Agency. It was just that I was the other colleague referred to, so I was the water quality, but specifically surface water technical specialist for the National Insteam Team and the EA. It was just to basically reiterate that I'm also liaising with colleagues throughout the Environment Agency for surface water to kind of keep on track with the links with the Hayford Park situation, and to say that whilst I see that there has been a kind of updated WFD assessment submitted on in very brief initial review, it doesn't appear to have reference to PFAS in there, and it was just to say that I think I can agree with the Gallus Brick Group for their comments earlier with respect to the fact that PFAS should be considered in the WFD assessment, and we'll kind of again, as has already been commented on, but we'll look forward to seeing their detailed submission and seeing what other points that they've made.

Speaker 3

Thank you. Thanks. Now to move on to contamination and remediation on the agenda.

Speaker 4
Might we just wait for just a second?

Speaker 3
Sorry, do you want to make some?

Speaker 18
Sorry, if I may. Thank you, Laura Beth Hutton, for the applicant. I just wanted to clarify the submissions of the Galasbrook. I don't think we can see any deadline two submissions. We know they submitted a written representation at deadline one, which we did respond to at deadline two. But if there is anything that was submitted at deadline two, it doesn't appear to be in the examination library. We can, of course, I

Speaker 1
suspect it might have been the deadline one submission that perhaps should have been. I think so, because I can't see anything on a quick look in terms of deadline two submission.

Speaker 18
In which case, we'll wait for the post hearing submissions and respond to that. Thank you.

Speaker 3
Yes, there's certainly a submission at terms line one, which is rep 1040. It's just a thought that if you felt that you hadn't responded the way you might now wish to respond, you presumably got an opportunity to to do that.

Speaker 18
Laura Bethaton for the applicant. Thank you, sir. Appreciate that, and we will we will take another look at that rep as well in case there's anything else we want to add.

Speaker 3
Yeah. Okay. Thanks very much. I just want to move on briefly to contamination and remediation aspects, and to say to Gallup's representatives that we note the contents of your written rep in the attached reports from Water Resource Associates and the Defence Estates Organisation, and these say that the pathway from the likely contamination source on the flying field of former RAF Upper Hayford, leaching through the soil into groundwater and surface water on and around the site is described as likely in the 2025 Hydro Ground Conditions Report for Heyford Park. Groundwater and surface water flowing through the adjacent Oxford Strategic Welfare Interchange site are also likely to be contaminated, as PFAS chemicals are highly mobile and can travel up to 10 kilometres in soil and water. The limestone principal aquifer under both sites, the Great Oolite, is described as vulnerable to contamination and risk assessments. And planning conditions for the Hayford Park site are supposed to protect it in line with the national planning policy framework. Two streams, tributaries of the Gaigle and Padbury Brooks, flow from interceptors on the flying field of the former RAF Upper Heyford, and the water appears to be coming out of the ground. PFAS contamination will not be stopped by the interceptors. Briefly, does that sum things up as you understand them, or is there anything you wish to add directly to that position?

Speaker 9
Was that our representation to submission? Because I think some of them might have been mislabeled.

Speaker 3
That's I'm just quoting from your written representation. Yeah, and I just wanted to check that that's a correct summary of your position at the moment.

Speaker 9
Well, sorry, Helen Christie, Galisbrook Group. With the additional information that just came out in the last couple of weeks. Then our position has moved on slightly in that in that written submission, it hadn't been confirmed that the source of the contamination was coming from the Hayford Park site, the former flying field, and now it has very clearly been confirmed that the source of the PFAS contamination is the fire training area, and that it is migrating. The contamination is migrating from that area off-site via the interceptors into local streams, and that pathway, the contaminant linkage pathway, is very clear. And that contaminant linkage pathway does not respect the site boundaries. So, if contaminated ground and surface water is flowing from the Hayford Park site onto the Oxfordshire Strategic Rail Freight Interchange site, there's not a division on the site boundary. That contamination linkage pathway is continuous across the two sites and should be treated as one unit in terms of mapping the contamination plume. Thank you.

Speaker 3
Thank you very much.

Speaker 1
Just conscious of the time. Just conscious of the time, actually, and wonder whether perhaps now might be a good sort of time to take perhaps a 20-minute break, which gives us enough time to to stretch our legs. But also, anybody who wishes to observe the the two-minute silence. So, what I suggest is we come back here at five past 11. So this hearing is adjourned to 11 o5.