Planning Inspectorate
Arolygiaeth Gynllunio

Hearing Transcript

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

Please note: This document is intended to assist Interested Parties.

It is not a verbatim text of what was said at the above hearing. The content was produced using artificial intelligence voice to text software. It may, therefore, include errors and should be assumed to be unedited.

The video recording published on the Planning Inspectorate project page is the primary record of the hearing.

TRANSCRIPT_Oxfordrail_ISH3_SESSION3_111126

WED, Nov 11, 2026 9:30AM • 1:26:17

00:05
Welcome back, everybody. Time is 2o'clock, and this issue-specific hearing three is resumed. I'm going to pass back over to Sir Adamai, who's going to take us through the rest of item number transport, whatever item it was, 3.2.

00:21
Thank you, mr. Hunter. Before the break, we were talking about cumulative traffic impact of the proposed development. I just like to know if any other person has comment on the cumulative impact of the proposed development. Thank you.

00:40
Thank you, George Goney, Oxfordshire County Council. Yeah, I think the county council might welcome the opportunity to come back on several of the things that were said this morning on the the modelling and the cumulative impact point, if that's okay. So I'd like to introduce my colleague, mr. Jackie Cox, who is Place Commissioner North within the Place Shaping Service at Oxfordshire County Council.

00:59
Hi, thank you. Yeah, Jackie Cox from Oxfordshire County Council. Should I cover all things in one go?

01:05
Yes, please.

01:06
Okay. So first of all, there was a query about the model and Junction 10. Just to say all the details, there's four little elements at Junction 10. They're all in the BISTA transport model. So that's just one point. In terms of the BTM itself, so we did get an independent person from the office who's not had any involvement with this before to just go back and check because there were some fundamental questions about it, and he concluded that it is a sound model. There was a lot of work done on it back in 2016, a lot of time spent on it. It's quite a complex model for a local town. It's got a variable demand matrix, which is was unusual back then. But because we knew we had East West Rail coming and new link roads, etc., we wanted quite a complex model. So that's what we had built. And then two years later, as mentioned earlier, we extended it in more detail to cover the Hayford area, so that was a additional 21 junctions looked at and all the roads in between. So the conclusion is that it is sound, it is a robust model, and it is the suitable model for looking at the impact around Hayford area and that wider Vista network. In terms of cumulative impact, we also, as a county council, as each development's coming forward, some of them, as mentioned earlier, haven't concluded their transport assessments yet. But we are stitching it all together ourselves. And there's a particular bit of work we're doing around the Hayford area, which will provide that all of them in one place, and whether the county council able to have a look at what the overall impact is. So that is being done at our our level.

02:52

Thank you, mrs. Cox. That's been very helpful. Is that all from the council? Yes. Oh, National Highways, please.

03:07
Excuse me. Thank you, Sir Jeremy Bloom, on behalf of National Highways. As Dr. Dunhill was was explaining earlier, we've been part of a transport working group on this project for a number of years, there's quite a history to it, and I think it's fair to say the applicant team has worked very collaboratively with with National Highways and the the local authorities as well in developing the whole approach to the transport assessment and sharing all the details with us. National Highways has undertaken a lot of assurance of the model and the modelling, and we are satisfied that the the BTM model is robust. It validates to within Department for Transport transport appraisal guidelines, it's all it validates very well. In fact, National Highways has its own Southeast Regional Transport model. I've seen study work that's been undertaken that that has generated very similar, very close, very similar results to the BTM, so we're absolutely satisfied that it that it's robust and appropriate for use in this area. In terms of the traffic growth forecasts and all all the assumptions around committed developments and so forth, again, that's all been agreed with us through the transport working group, so we're satisfied with with all of that work and and also the the peak periods that were the peak periods that were assumed as well. Absolutely endorse what was said. That that's been a very robust assessment. So we've reviewed everything. We've had technical consultants review the detail, and we're satisfied that the forecasts are all robust. That the impacts on the strategic road network have been satisfactorily demonstrated, and that the mitigation is is effective, so yes, we're all we're satisfied. The one area where we do have a slight question mark is on the the opening year scenario, where we have construction continuing on on the phase two of the SRN works at Junction 10, at the same time as operation of the first phase, we think the impacts are probably unlikely to be significant. In fairness, but we just want to understand a bit more about how how the works could be undertaken, just to provide absolute assurance that that that it can all be undertaken without adverse impact on the SRN. So the the the applicant has arranged a session with us to go through that in detail at the end of the month. As I say, it's unlikely to be a significant concern, but all other aspects have been agreed, and National Highway is satisfied.

06:33
Thank you, mr. Bloom. One thing I'd like to ask because is the the conflict between the SRM work and the the work construction work relating to the proposed development. How would you resolve that? That's that's my concern at the moment. How that will be taken into account in terms of programming? Yeah, is that the sort of thing you will agree with the applicant? The programming of the work, so that you can alternate.

07:09
So, in reality, that will come down to the the detail of of the traffic management and the phasing of of how the works are built, and that won't be determined until the contractors design that, and and you know much nearer to the time. However, what we can do, and we're going to do with the applicant, is is sort of discuss that with the team and consider how it can possibly be built through with with the traffic management. So I'm I'm sure it can. We do know the A43 is a very congested corridor with additional traffic and works going on. We just need to make sure that that it that it can happen without you know the whole area becoming gridlocked, but it will depend on sort of detailed planning of the works and how the traffic management works. But we will look at some scenarios when we meet in a couple of weeks, and I'm confident that we'll be assured that there's a workable solution.

08:23
Thank you, mr. Blum. I'll now move on to ES Appendix 3.1 Transport Assessment Part One, ES-055. five. Still, yeah. Could the applicant also describe the results of the junction capacity assessment for the

M 40 junction 10, including the Adley and Chowwell Motor Services roundabouts, from the base scenario to the 2031 opening? year, and then to 2034 completion years, also highlighting changes in practical reserve capacities and journey time savings. For instance, it needs to include and identify junction arms requiring additional mitigation beyond the embedded mitigation due to their degree of saturation excessively exceeding the desirable limit of 0.85. Because I notice some of the junction arms have exceeded that limit significantly. So I would like the applicant to comment on that to describe all those modelling to us, please.

09:50
Stuart, I hope for the applicant the the assessment at Junction 10, sir. So that's that's. Dealt with in a number of levels of detail. So obviously we have the strategic modelling, and then we have more detailed individual juncture modelling using GlinSig. But the the main assessment tool, the more detailed or sophisticated assessment tool is the is the microsimulation modelling, so that is detailed at section 11 of the of the transport assessment in terms of the completion year, and it is detailed at section 12 of the transport assessment for the opening year, so the 2031 year. I think one of the key things to appreciate in the operation of the Junction 10 complex, so the the Visim model looks at the the whole network. So it looks at the A43 corridor up to Baynard's Green Junction 10 itself, so the Padbury roundabout, the Joel and Ardley roundabouts, and then it takes into account the B430 down. to the the site, and in the in the in the with development scenario includes the the Ardley bypass, and the the the vision network is shown at the the figures within section 11 figures 11.2 through to 11.5, which shows the network that we've modelled. In the in the reference case scenario, in the so we consider two two reference case scenarios. We consider a reference case scenario with the highway network as it currently is, and then we also consider a scenario with the potential improvement at Baynard's Green that would be delivered by the Albion or Tritax scheme should they gain a planning permission appeal, and and you get two kind of markedly different behaviours in terms of the way that that complex operates. So, in the in the scenario with the network as it is, the the Baynard's Green Junction is a real congestion hotspot, and there is significant what's called latent demand. So that means within the model, it's it's traffic that can't enter the model because of the queuing at the junction. So you get queuing back on on the approaches to to Baynard's Green, on on the A43 southbound, and on the the B4100 approaches to the to the roundabout. And in that in the reference case scenario, there is very significant latent demand that's provided at table 11 point 11. So there's there's over 1000 vehicles that can't enter the the network. That's in the that's in the scenario where we're using the the direct BTM flows in the sensitivity test scenario that that we were discussing earlier where we take the vision flows and we add the the growth from the Vista model in. That latent demand is is even higher. It's 1,600 vehicles, and that that table also provides metrics in terms of average delay per vehicle, which is 95 seconds, and an average speed of of 44 miles per hour for traffic within that network. In the with development scenario, compared back to that existing baseline, we see that there we resolve the issues at Baynard's Green, and there is zero latent demand in the model, so all of the traffic can can enter the model because we've resolved the congestion at Bayonard's Green, that means that there is overall a significant improvement in in journey time through that network. So the the average delay reduces from 95 seconds, for example, in the AMP to 48 seconds, and the speed increases from 44 to 49 miles an hour. So, so when we're assessing it, sir, we're looking at it holistically, and you know clearly from those those those high-level summary tables, there is a significant benefit to to providing the mitigation associated with OXS RFI at the network. In the scenario where Baynard's Green is improved, we see that what happens is that traffic is is then released from the Baynards Green Green Junction, and it comes down to the to the Padbury, the Cherwell, and the Ardley junctions. So, in that future reference case scenario, so without us. But with Albion or Tritax, for example, improving that junction, the Baynards Green Junction, we see that traffic can come down to the Junction 10 complex, and that results, and we can see in the in the modelling that results in a in a queue forming on Ardley Roundabout on the northbound off slip, and that queue is significant and it is forecast tailback to the the M40 mainline.

15:25
So, in a scenario where a third party improves Baynard's green, there is a there is a knock-on impact at the Junction 10 complex, and specifically at the Ardley roundabout. And clearly, queuing back to the main line is a significant safety concern. So, again, in that scenario, and that's that's demonstrated by the the the work presented at tables 1114 to and 1115. Under that scenario, the works that the OXSRI scheme will deliver resolve that issue at Ardley. So we we enlarged the Ardley roundabout. There is signalisation of that, and that controls the traffic through the through the network. So again, we remove that queuing, you know, that safety concern with queuing back to the to the M40 mainline. So so we're looking at it at holistic journey times through the networks. In both cases, the journey times improve. Both cases, we see an improvement in in average speed through the junction, and in all cases, that's better than the scenario without the OXS RFI scheme.

16:37
Thank you very much. That's helpful. Referring also to M40 Junction 10, including the Adlai and Chowwell Motor Services roundabout, could the applicant explain how the continuous operation of nearby businesses, particularly Chowwe Motor Services will be safeguarded throughout the construction phase of the proposed development.

17:10
Thank you, Simon Hilditch, for the applicant. So, so first of all, the applicant recognises the importance of maintaining traffic flow capacity during the works on the Junction 10 area and maintaining access to the services, and the applicant recognises the important safety and welfare function that services areas provide on the Studio Road network. As referred to mr. Bloom a few minutes ago, the applicant is in ongoing dialogue on national highways about some of the specific details of the construction sequencing, especially in relation to when there's a scenario where the ongoing construction works at Junction 10 coincide with some of the first operations of the OX SRFI development, and as mr. Bloom referred to, we have a meeting with them later this month, and we'll therefore provide more information to into the examination at an appropriate deadline following that, and overall, in terms of security, all the works on the strategic road network are secured by the protected provisions, which include having to provide details of the detailed traffic management and appropriate road space booking procedures. Will have to be followed in due course.

18:23
Thank you. That's useful. I now turn to Appendix 36 of ES Appendix 3.1 Transport Assessment Part Three, AS-OC Four. Could the applicant explain whether Stage One or Stage Two Road Safety Audit have been has been completed for the M40 Junctions Nine and 10, including the Adley and Chowwell Motor Services roundabouts? The identified highway safety concerns as well. Elaborate on the identified highway safety concerns and what recommendations were made, mitigation proposals, and how any outstanding recommendations will be addressed prior to construction of the junctions, please.

19:26
Simon Hildich for the applicant. So, first of all, the applicant completed an interim stage one grade safety audit, which is the aforementioned TA Appendix 36, early in the process, and the purpose of that was to ensure that an independent safety review was taken very early in the design process. That's not actually a mandatory requirement of design monitor for roads and bridges. The DMRB requirement is actually at the end of the preliminary design. But we considered it was, given the scale and nature of the works, actually to have that independent review early. To inform the design development was incredibly important to do, and we did that in conjunction with National Highways and OCC. So that is what you currently have before you in the in the original application documentation. The it was always

the intention that a full formal stage one safety audit would be carried out at the end of the preliminary design stage, which is where we now currently are, and that's been completed, and that was submitted at deadline two, and that is in the T addendum document reference CR one dash 062. I appreciate, therefore, that's buried in with the change documentation. But effectively, that document would have been submitted at deadline two, in any events, with or without the change application process, the issues raised from that there's a number of outstanding issues raised that we need to then go and address. But they are compared to issues raised in the interim, they are relatively minor in scale, and that shows the benefit of having done the interim audit very early on in the process, following the due process in road safety audit requirements standards GG 119, the response report has been discussed with both Oxfordshire and National Highways, and that's been agreed with them now in terms of the actions arising from that, and that response report will be issued at deadline three, and we're just finalising a series of very minor amendments to the design that come out of the agreed actions resulting from the response report, and subject to those actions, so those changes being agreed to both the parties, we also intend to submit those at deadline three. You referred also to stage two road safety audit. The stage two road safety audit, as you may be aware, is required at the end of the detail design stage, and the protective provisions for both parties require us to do that in in due course as part of the the detail design stage.

21:58
If I can confirm, this is stage one as road safety audit that you've just completed, following the, and then I'd like to confirm that the detailed design has been completed at this point in time. Is that what I gather from yourselves,

22:16
Simon Hill? Did sure the applicants know the the preliminary design stage has been completed at this point in time, which then requires the stage one audit. The detail design stage will be done in due course if we were to be granted consent, and that's then covered by the the detail design part of the protective revisions, which cover all the detailed design aspects from safety barriers to light details of lighting to every last street sign, etc., etc. And that's all standard standard practice.

22:42
So that means the stage one will not be completed until consent. If until if consent is granted, is that what I'm gathering from you?

22:53
No. So stage one is is has been completed at redesign stage, which is now stage two will be completed at the detail design stage in due course. So that hopefully that one

23:05
has been completed.

23:06
Yes. Okay. And the stage one is the formal stage one report is what is in CR one dash series six two appendix. I think it's appendix three. Yes, I think it is appendix three in that document.

23:22
Thank you. I now turn to the applicant's response to question Q1.17.5 or of ESQ1 Rev2-019, where it is stated that most personal injury collisions are rear end shunts on the A 34 northbound, with a likely contributory factor being queuing on the approach to M 40 Junction nine. Could the applicant explain

why other physical measures, such as high friction surface treatment, which is very relevant to mitigating against rear collision, has not been considered?

24:16
Simon Hilditch for the applicant. So it relates a little bit to what I just said about preliminary design and detail design. So, a detail design stage, things like the specific details of warning signs and specific requirements for pavement works and skid resistance will absolutely be required to be considered at that appropriate stage. That we're not there yet in terms of the level of design maturity. The fundamental principle at this point in time, is that we've developed a scheme to reduce the queuing and provide a speed limit on that approach, which will therefore reduce both the likelihood and severity of the of the collisions that may continue to occur.

24:56
Sorry, I don't think that's adequate because in. Your report, all you were referring is to you refer to reduction in speed limit and graduated speed. I agree with that, but something so substantial, this fundamental solution, engineering solution that should have been specified in the report. That these are the things we're going to do, but the critical ones should not be missed out.

25:25
Simon Hilditch for the applicant. I don't agree. It's not been missed, but it is a the pavement design and the skid resistance of the surface course is very much a detailed design stage. And what we would need to do is agree with National Highways the specific measures for the length and amount of high friction surfacing, and it is, but that is absolutely standard practice to do as part of a detailed design.

25:49
Would the report be updated to? Because we're waiting to see this. I mean, without saying it, we don't know what you're going to do. So all is talking about is speed reduction measures, which is not fundamental to solving the problem of rear-end collision, is not fundamental to the fundamental is engineering solution combined with other solution as speed reduction measures.

26:20
Simon Doddish for the applicant. The reduction of the of the queue length is a significant benefit in reducing the the likelihood of rear end collisions. The reduction in speed limit is a significant contribution in reducing the likelihood because it gives more people time to react because they're travelling slower. And as as I said, the the high friction surfacing or detailed servicing point will absolutely be addressed at the detailed design. We can confirm in the post-home submissions as part of this to confirm that that will be done. But it is standard practice and is a requirement for us to do under the design manual for roads and bridges, which is required for us to follow as part of the protected provisions. So I've got no problem with confirming that in the post-home submissions.

27:01
Thank you,

27:03
sir. Perhaps if I could just come in on that as well. So the the rear enchant type accident that's very typical of a of a moving queue. So yeah, you've got a queue of traffic, and and and yeah, that's when people lose concentration, and you're shunting forwards, and you get the rear enchant. I think we're certainly seeing that on the approach to Junction Nine on the A34, so so the the proposed mitigation, which increases the capacity of that approach, reduces the queue, so reduces the instances where you're going to have traffic queuing, and therefore the opportunity for that rear entrance accident to

happen. So it's it's twofold, as mr. Hilditch says, it's the it's the mitigation that reduces the queuing itself, and then it's the speed limit, which actually then gives the drivers more reaction time on the approach to any queue that that is there.

27:49
Thank you. Could the applicant also confirm the predominant contributory factor for the Nigeria accidents? at M40 Junction 10, and explain specific accident mitigation measures that would be implemented.

28:16
Simon Hilditch for the for the applicant. The if if I may just talk through the series of junctions that comprise Junction 10, starting from Baynos Green, going down to down to Ardley. At Baynos Green, and a lot of this is sort of reading from the already provided response response to the question. The Bay Noss Green Junction will be signal controlled. It's currently priority controlled junction, and that provides both drivers and actually non-motorised users dedicated stages to navigate the junction, thereby reducing the number of direct conflicts compared to a priority controlled arrangement. There's a series of reduced speed limits on the A43, so on the southbound approach to Baynards Green, we're extending the 50 mile an hour speed limit back up upstream, and that would have a very similar effect to the effect mr. Duncan Hill has just explained as well in terms of the approach to to a set of traffic signals at a junction. We are then providing a 40 mile speed limit through the Padbury, Chirrwell, Ardley junctions, and they're shown on the on the speed limit plans. There's a series of improvements to the slip roads, capacity improvement, for example, at the southbound merge on the M40, which is just upstream of one of the recorded fatal accidents, and reconfiguration of the northbound slip roads with significant additional capacity provided by the second diverge, and that will reduce the amount of traffic through traffic travelling through the Ardley and the Cherwell roundabouts. And again, the provision of traffic signal control at the Ardley roundabout will address the queuing or potential for queuing back onto the M40. And again, as mr. Duncan Hill explained previously, in terms of the benefits of the Ardley Junction improvement. So, therefore, there's a series of works that will very much address existing accident issues around that overall complex of junctions within Junction 10.

30:31
Thank you. As any of the authorities, any comments to make? Thanks, mr. Bloom.

30:38
Excuse me. Yes, Jeremy Bloom, on behalf of National Highways, I won't repeat everything that mr. Hilditch has said. He's explained it all in far better detail than than I'm able to. But what I would say is the design has been reviewed in detail by National Highway specialists. We've reviewed the road safety audit brief and the road safety audit itself, and it's we concluded it's all been undertaken in compliance with the DMRB, and we're satisfied with the measures that are being taken to amend the design, as mr. Hildych said, they're relatively minor, and I I do agree with mr. Hilditch's comment that the the proposal, the proposed works on the SRN at both Junction Nine and Junction 10, not only mitigate the impact of the development, but also improve the safety performance. Potential are expected to improve the safety and performance of the junctions by by various measures: speed reductions, signalisation, additional capacity. All of those measures will, as described, reduce queuing and and the both the likelihood and severity of of collisions. So overall, National Highways is supportive of of the proposals from both a capacity and safety perspective.

32:23
Thank you, mr. Blum. That's very useful. Is there any other person online who would like to comment? No, I don't seem to see anybody wishing to come. Oh, mr.

32:42
Yes, I mean I'd like to comment on the more general topic of transport, not the specific topic, but I don't know if this is the right time to do that.

32:50
Is it is it transport specific? Yes, yes, yes.

32:53
Thank you. So my name is Philip Nostrand, mr. Philip Nostrand. I am the founder of Stop the Trojan horse, and I'd like to just make a few comments regarding the potential for passenger rail to mitigate some of these effects that we've been discussing today, and how that's being examined by this process, and and yesterday I pointed out the existence of this document, a report commissioned by Oxfordshire County Council that by a consultancy called SLC, that directly contradicts the applicant's position on Artlee Station, and I've already committed to to filing this with the with the examining authority. Obviously, the applicant was not here yesterday; chose not to be present. So, I'm not going to go into more detail about this document, other than to say that one of the key documents that's referenced in here is a document prepared by Network Rail, known as Chiltern Route Strategic Advice, August 2026, and I have obtained or I have attempted to obtain a copy of that document by filing freedom and information requests with Network Rail and with Oxfordshire County Council. And subsequent to yesterday's hearing, I have been informed that these requests for the document have been refused on the basis that it's still in the course of completion, unfinished. mr. Nostrand,

34:46
sorry, I might have to stop you there because the purpose of today's hearing is very much for us to ask the questions, and we've set the agenda out. I think you're slightly deviating from the agenda and the questions that we want to get. So it's our hearing. I apologise. I appreciate what you're trying to say, but I think we're actually moving on to topics that actually, perhaps we've explored. We've asked in questions. We may be asked further questions on once we've got the information referred to yesterday. I'm reluctant to open up a discussion on something that's not on the agenda, which is where I think we seem to be going at the moment. So I really want to hear from you, but really on the matters that we've been discussing that the applicant has been providing answers to, because that's the pure purpose of this hearing today.

35:26
I apologise.

35:30
That is the other option as well. It's a written process, so as we said yesterday. So if you could put those in, but if there are comments you have to make in terms of what we've been discussing, please feel free. We'd like to hear from them. Thank you.

35:42
Oxfordshire County Council, please.

35:45
Sorry, George Ganey, Oxfordshire County Council. I appreciate we're moving on from mr. North's point, but just as coming back on that point and yesterday, in order to avoid any doubt, the County Council is going to submit the pre-feasibility study that he's discussing into the examination at D3.

35:58
That that would be helpful, and I think that's what you undertook to do yesterday, anyway. So that's that's helpful. Thank you. Thank

36:02
you, mr. Gorney. I think that's the end of this item on the agenda. I'll now pass on to my colleague, mr. Oh, oh, there's somewhere. I'm sorry.

36:33
Martin Lipson, Chair of the Mid Chowwell Neighbourhood Plan Forum. I'm returning to the substantive point about transport, and appreciate you giving me a bit of time to speak. Just to remind you, the Neighbourhood Plan Forum represents 11 parishes working together, and we are the parishes most affected by the SRFI scheme. I'm mindful of your earlier comments about not making long speeches. So what I plan to do is to submit the full text of of what we want to do at deadline four or three coming up. But what I would like to do is to just give you a summary now, and I won't speak for more than five minutes. Is that okay?

37:26
Yes. Yes, that's absolutely fine. Thank you.

37:28
Thank you. We take the view that the BISTA transport model is not a reliable tool for predicting traffic flows. Oxfordshire County Council has rebutted this, and the MCNP Forum has prepared a counter rebuttal, if I think that's the right term, which will be discussed at a meeting with them on the 26th of November. We will submit documentation to the examining authority after that date, so that will probably mean deadline four for that. In addition, and importantly, the whole question of cumulative impact of the numerous developments likely to impact the neighbourhood has now become the subject of ministerial interest. An initial meeting with MHCLG senior officials is proposed for the near future. That's quite an important development from from the local community's point of view. Vista's transport model was originally developed for the area around Bicester, as as we've heard, and it was then extended in 2018 to assess development at Hayford Park. This update model is unreliable for several reasons. Firstly, there's a fundamental problem with how the model works. Model used tables known as origin-destination matrices to estimate how many journeys are made between different areas and where they start and end. However, these matrices were very substantially altered to make the model traffic match observed counts on roads. The adjustments were widespread, and some far exceeded government guidance criteria, where it's the web tag, in certain cases reaching 30, 40, and even 70 percent against a threshold of 5 percent. This can be seen in the local model validation report of 2018 and its appendices. There is no published evidence to show that these substantial changes were properly investigated or justified as required by government guidance, the problem is aggravated because the altered matrices were not properly checked to show whether they still represented realistic journeys in the Hayford Park area. This is because the checks focused on total traffic crossing a line through the centre of Bicester, the screen line, and the boundary around Bicester. That's the cordon. This clearly cannot demonstrate how traffic is routing around Hayford Park. Secondly, the highway assignment validation is insufficient. This is where the modelled traffic is compared with observed counts on selected roads and at junctions. The problem is that very few independent counts were used to validate the model. For the 2016 base model, OCC's rebuttal presents just four link counts for the whole of the area around Hayford Park. This cannot show that the model is fit for purpose in the area. Furthermore, because of the matrix problem, even when where observed and modelled counts are similar, that does not demonstrate that the underlying journeys and routes taken by vehicles are correct. Thirdly, the B4030 is a major concern for the OX SRFI. This road is the obvious route for OX

SRFI employment traffic via the Hayford Park Link Road, and yet it appears to have been largely overlooked in the assessment. The model significantly underestimates westbound traffic on this road. The local model validation report of 2018, which describes the process of producing the model update, acknowledges that turning counts towards the western edge of the model are likely to be underrepresented. The Hopcroft Holt Junction, the model fails to represent westbound traffic on the B4030 turning towards Oxford on the A4260. This is important when considering the cumulative impact of the Oxus RFI with Hayford Park's 9,000 homes application, because the B430 would serve both developments, and this road has been underestimated for the Hayford Park application as well, because they're also using the Bicester Transport model. I'll just be two more minutes. There are other important deficiencies. Two principal routes west from the Ox SRFI have single-lane bridges over the River Charwell. Neither bridge was included in the original journey time validation. No attention has been given as to how traffic at volume will negotiate these constraints at Somerton or Lower Hayford, or how this will influence route choice. There are also serious concerns about the model's representation of HGVs, the automatic traffic counts used in the January 26 validation check did not distinguish between cars, light good vehicles, and HGVs. They therefore cannot demonstrate that the model reasonably represents each vehicle type separately. More seriously, the 2016-based model assigned no HGVs on the B4030 at either peak time, when an OCC survey at a similar time recorded an average of 682 HGVs per day on this road.

43:35
In conclusion, the evidence presented so far has not demonstrated that the BISTA transport model is reliable for assessing traffic impacts on the roads to the west of the applicant's site. We therefore ask the examining authority to require proper evidence that the model accurately represents journeys and routes in this area to ensure that the traffic impacts of the applicant's scheme, and in combination with the impacts from Hayford Park, are properly assessed before conclusions are reached about the and what impacts. Thank you very much.

44:17
Thank you, mr. Lipson. Can I ask the applicant to comment on mr. Lipson's concerns, please?

44:28
Sir, thank you, Alexander Booth, on behalf of the applicant. I'm not sure that it would be an efficient use of time for mr. Duncan Hill to respond to each of these detailed points. As you'll have seen, he's already set out, we say comprehensively, his stall in relation to why the Bicester Transport model works. I mean, the short overarching point that I do want to make on behalf of the applicant is that it is not simply a question of Oxfordshire County Council claiming that their model works, although they do. And we've heard about that very clearly this afternoon. Oxfordshire County Council are satisfied that it is a robust model. The applicant is also satisfied it is a robust model, and you've heard from mr. Duncan. Similarly, National Highways is also satisfied that it represents a robust model, and you've heard from mr. Bloom. So, we do point to that aggregate assessment that has been done of the model, and to the extent we want, I'm going to pass to mr. Duncan in case there's anything he does want to say. But given he's already addressed the examination at some length, and given also that we have a great deal further to do, I'm not sure it would be appropriate for him to speak to points of detail and to trot through that list. But I'm going to offer mr. Duncan the opportunity.

45:48
Thank you,

45:49
Stuart Duncan, for the applicant. No, I think I think that's correct, Alex. I think nothing further to add.

45:55
Does mr. Gurney want to talk? Yes, thank you, George. Go in the Office for County Council. Obviously, there was a lot in submission, and we do have a meeting scheduled with MCMP to discuss it. So I propose that we come back in writing as well following that discussion.

46:11
Thank you, mr. Grani. I will now. I think, if unless there is any other person that wishes to talk,

46:21
if I may just, if we are just proceeding to the end of the transport item on the agenda, if if that's what I understand we are doing, and we're now moving to other matters, there one was just one further point that I wanted to touch on. It's not a detailed technical point, but I am aware that yesterday at the open floor hearing, there was what I might describe as some dismissive comment as to the applicant's approach to highways and transport-related matters, and in particular, for example, it was stated that well, yes, there is some tinkering by the applicant with the local highways network by way of mitigation, and and so I just do want to put on the record that we do not accept that that is a proper characterisation of the very extensive series of works that the applicant is proposing, and in particular, given that the tinkering, so-called, amounts to some 120 million pounds of highways infrastructure works. We do say that that is a very extensive and very robust approach that we are adopting in respect of highways matters more generally. But I just wanted to leave that on the file. Thank you, sir.

47:34
Thanks, mr. Booth. I think we have some confirmation from national highways and. and Oxfordshire County Council and Chawei District Council. So the various authorities have given us their view on the module on the transport assessment in general. So we've had all are noted. By the way, I just like to pass on to my colleague, mr. Rigby, who will take on the next agenda item on the agenda.

48:10
Thank you, mr. Ibadi. Under this agenda item 3.3, I have questions for Smith and Sons, and I'll invite comments and responses from the host authorities and the applicants. And as posted on the agenda, we're focusing on current planned extraction, safeguarding mineral resources, future planned extraction, and the possible severance and sterilisation effects of the proposed Middleton Stoney relief road. This subject was considered at the last hearing at Agenda 3.5. We've considered all the post-hearing and other submissions, and my starting point today is the written representation from Smith and Sons at Rep 1052. I want to consider further information we've received, particularly the applicant's responses, both to that written representation and to the local impact report. And during this agenda item, I may also refer to the applicant's responses to first written questions at Rep 2019, and the host authority's response to first written questions at Rep 2030, particularly the question 1815 about mineral resource and the request for further information. So I have down to speak Joe Davies from Smith and Sons, who I believe is online. Is that correct?

49:50
Yes, that's right.

49:52
Waiting for. Thank you. And Sean Fleet from Charwell District Council. And. George Gurney and Debbie Prince from Oxfordshire County Council. Thank you very much. Great stuff. Right. So, the Smith and Sons' written representation says that Smiths wish to reject the proposed development due to sterilisation of future reserves that the company is wishing to extract, and they cite the introduction to

Chapter 11 of the August 2026 MPPF, which says the objective of the policies in this chapter is to ensure that there is sufficient supply of minerals, which are essential to provide the infrastructure, buildings, green energy, and goods which the country needs, minerals are a finite resource and can only be worked where they're found. Best new use needs to be made of them to secure their long-term conservation. Smith and Sons also state smiths have been extracting limestone in the Ardley area for a number of years and currently extract limestone from Dewar's Farm Quarry, which is located to the east of the proposed development, and to the north of the proposed Middleton Stoney Bypass. So, firstly, I had short questions for Smith and Sons if they're able to help us here. Firstly, how much stone is currently extracted from Dewar's farm quarry. How much of it is in the Ardley area, and at what rate is it currently extracted? Are you able to give us some figures?

51:33
In terms of sort of annual outputs, it's quite a difficult. It sort of varies depending on market supply. Currently, we do about 350,000 tonnes per annum. But following post-COVID, when demand was extremely high, we were up to about 750,000 tonnes per annum.

52:05
Thank you. So, just making a note, get the numbers right. Because you make reference to Dewes Farm and also from the Harley area generally. Do you have any numbers for the the wider area, or is it just Dewes Farm?

52:20
No, we just operate Jewers Farm Quarry at the moment, but there have been a number of extensions to that quarry over the over the years. So our current operation is at Jew's Farm Quarry, but there have been previous limestone quarries within the Yardley area.

52:40
Thanks. I think I can probably do the numbers on on my last question because it's yeah it's divided. Is it does it have peaks and troughs in the air or is it relatively uniform?

52:52
Fairly uniform, but obviously it sometimes drops off in the the winter With weather depending on whether it's extremely wet or extremely cold, then our demand goes up and down slightly.

53:12
Great, thanks for that. So moving on to the safeguarding issue, you cite policy m6 safeguarding mineral resources, which says that proposals for non-mineral development should not constrain potential future use of mineral working, and the prior extraction of minerals, where practicable and environmentally feasible, should be supported where it would prevent sterilisation of mineral deposits as a consequence of other forms of development proposals or allocations. So, bearing in mind what we just talked about about the numbers, when do you expect Dewes Farm Quarry to be exhausted? So, for how much longer do we anticipate working that quarry?

53:59
We've just had an extension granted, which we've just started working on, which will last us approximately eight to 10 years, depending on market supply. But as you will appreciate, it takes quite a long time to get planning permission for developments such as a quarry, and therefore we're already looking for a further extension or a replacement quarry, which has highlighted reserves within the area.

54:36

So that's feeding into the prior extraction of minerals Issue, how that would be practical and environmentally feasible. The idea that you could extract in advance before you know whether you've got a market.

54:56
Obviously, the the applicants. You know, has said that the the development would sterilise 7 million tonnes, which obviously is is not feasible to to prior extract. But we certainly believe that there are small areas that could be extracted. We recently commissioned a report to look at replacement quarries for Dew's farm when it's exhausted, which has highlighted a deposit, part of which will be sterilised by the SRFI, and that has demonstrated it would be about 2.9 million tonnes of the deposit that that will be sterilised, and also the the Middleton Stoney relief road. We've actually drilled all of that land to the south of our existing site, and that would sterilise approximately 1 million tonnes. You know, sort of small areas like that would be feasible to prior extract.

56:00
Thank you. Could the host authorities comment on what we've just been discussing?

56:10
Thank you, George. Again, the Oxford County Council. I'm going to introduce my colleague, mrs. Debbie Prince, Principal Planner in our Minerals and Waste Policy Team.

56:26
Thank you, Debbie Prince, Oxfordshire County Council.

56:31
Could you speak closer because you very quietly spoke, and just want to make sure the recording comes out.

56:35
Thank you, thank you. With respect to the figures, you may also be interested in that Oxfordshire County Council, as as mineral authority, do actually compile the local aggregate assessment every year, which gives details of the aggregate resource and also the land banks of each aggregate that will be published hopefully in December. So you may be interested, and obviously we will get that to you as soon as it's published.

57:18
Yes, that will be useful. Thank you.

57:19
Okay. The other thing that I need to to mention is the the policy that Joe was referring to is actually m8 for safeguarding of materials.

57:38
Right. I just thought I'd been quoting from the thing. Thank you very much indeed. I'll make a note of that. Otherwise, I'm otherwise correct in what it says. Yes, about non-mineral development. Is that what you're what you're talking about? And would the applicant like to respond to what we've heard. Sorry, have you anything more to say?

58:27

Debbie Prince, Oxfordshire County Council. So, with with regard to mineral safeguarding, mineral safeguarding is a requirement of the MPPF, and our minerals and waste plan, as we are minerals and waste authority, is is drawn up in in conjunction with those requirements. We are in the preparation of a new plan. This one relates to takes us to 2031, and the the new one hopefully will take us to 2042. The I suppose our our case regarding mineral safeguarding from the Minerals and Waste Local Planning Authority has been discussed at length through our R and R and our LIR, and I don't really want to duplicate that. But it does seem that we are still. There are a number of unresolved matters relating to that, and also to the the subject that we're going to be covering in a minute, which is waste. So the applicants, I believe, have offered further discussions with us. Which we would, which we would welcome, and any further information. And in this respect as well, we would also welcome progress with the formulation of a statement of common ground.

1:00:18
Thank you very much. Would you like to respond, please, to the applicant?

1:00:22
Thank you very much, Alexander Booth, on behalf of the applicant. In a moment, I'm going to turn to my right and invite mr. Harley and mr. Robinson to contribute as they see fit. But I'm just going to make a couple of initial observations. Firstly, just to pick up on that last point, yes, further discussions certainly with the county council. We will look to engage as we have been engaging, and that willingness on the part of the county council to engage is very much welcomed. Second point is this: I mean, it is recognised by the applicant that there will be a degree of mineral sterilised by these proposals, so that cannot reasonably be avoided, and it falls to be weighed in the balance of your, as it is to say, the examining authority's evaluation in making its recommendation, and also weighed by the Secretary of State in reaching their decision. However, sir, there are a number of points that fall to be considered and are relevant in that context. First of all, this mineral resource is not a rare one. Secondly, the safeguarded area is very extensive. Thirdly, sir, there is no interference with the permitted development at Dewar's Farm Quarry in terms of the existing operations. Fourthly, and I note from the Smith and Son's written representation that what is cited as being of most concern is what they see as Smith and Son see as the frustration of their proposals to extend to the south and the sterilisation that would be occasioned by the Middleton Stoney Bypass. So I do have to flag in that context that such extension, first of all, is not permitted. There is no planning permission for such development. Secondly, such extension does not comprise an allocation in any minerals and waste plan. And thirdly, sir, such extension is not even a draft allocation in a draft minerals and waste plan, and I do need to flag that point. So, in circumstances where reference has just been made by the county council to its proposals to bring forward a replacement plan, I think it's fair to say that that intent on the part of the council is is very nascent in the sense that the plan is at an extremely early stage, and the adoption of any such plan and the allocation of any such site as this southern extension is a very considerable way off. The fifth, I think, final point I'd look to make before turning to those sat to my right is that the totality of the reserve on site would not be sterilised. Mineral excavated on site as part of the development will be utilised on site as part of the development. For example, in the context of the bund being created, so we do say to that there is an appropriate approach being adopted. That said, we note what Smith and Son say about prior extraction. It's said that prior extraction should take place in relation to what is said to be a relatively small tonnage by Smith and Sons in their written representation. Of course, that relatively small tonnage issue cuts both ways, and what said is it's a relatively small tonnage that should be extracted prior to development, but of course the converse is true. It's a relatively small tonnage that is being sterilised, insofar as it is being sterilised. But at that point, I'm going to turn to mr. Harley to see if there's anything that he or mr. Robinson wish to add.

1:04:36

Thank you. Thank you,

1:04:38
mr. Booth. Thank you, Sir Steve Harley, for the applicant. Just, just a few additional points, really. But those those introductory remarks are helpful for Ms. Boo in covering the the main points. And we've been consistent on those points throughout our work to prepare the ES and and since. And we have spoken to colleagues at Oxfordshire, and and as Ms. Pooh says, very happy to and absolutely intend to carry on doing that. But we we have through our ES Chapter 11 accepted the fundamental issues around the site sits within a safeguarding area. The safeguarding area is much more extensive than our site alone, and that as we just heard, there is some there is some adverse effect as a result of sterilisation. But we've also put forward some positive remedial actions and mitigation, really, to try and mitigate and minimise that that harm in terms of the policies of the of the core strategy, and and as you just heard, the strategy that we would deploy would see all site one material or site one mineral reused on site, and the benefits of that, sir, are to well, obviously, make make sustainable use of that of that resource itself, but also it prevents additional pressure being placed on supply chains for that mineral from other other sources, and of course, any transport movements associated with with the movement of of aggregates by offsetting the need to bring some some of it on, so we we say we mitigate and minimise that harm, as as the council council would see in terms of their policy. But I wanted to just draw attention to to the the thrust and the detail of policy m8, which colleagues obviously have helpfully already directed you to as policy m8 of the minerals and waste local plan, and essentially that that that allows for non-material sorry non-mineral development in minerals safeguarding areas, subject to the need for the development outweighing the economic and sustainability consideration.

1:06:35
Yeah, thanks. Yeah, we'll go into that. So no, no, you're not to know. But yes, yeah, we we have that point. Shall I just come? We'll

1:06:44
come to it.

1:06:44
That would be fine. We'll come to it. Yeah, thanks very much. Is there anything else you wanted to add? Thank you. So I'm just moving on now to the third point on this agenda point, future planned extraction and sterilisation.

1:07:07
Apologies, we're just wondering if we could come back and appoint the applicant just made, if that's okay. Sorry, we were wondering if we could just come back and appoint the applicant just made, if that's all right,

1:07:20
can we leave it to the end?

1:07:22
Okay. Yep.

1:07:24
Thank you. So just just moving back to the future planned extraction sterilisation, that the written rep from Smith and Sons says that policy M3 has designated the area northwest of Bicester as a strategic resource area, under policy M8 says what is designated as safeguarding for possible future use, and

we get to the test there unless it can be shown that the site has been allocated to a development in an adopted local plan, or the need for the development outweighs the economic and sustainability considerations relating to the mineral resource, and the mineral would be extracted prior to the development taking place. And Smith's representation says that the size of the proposed development represents a significant area that would permanently sterilised important resources, and that a possible extension to the west of the current site would be partially sterilised by the proposed development and would be uneconomic. I just want to ask Smith and Sons three quick questions, please. Firstly, in respect of the test in policy M8, the applicant argues in its response to the LIR that the need for the proposed development outweighs the economic and sustainability considerations relating to the mineral resource, or that the mineral we extracted prior to developments taking place. So, if Smiths could explain why you consider this is not the case, and that the provisos in Policy M8 don't apply,

1:09:20
I'm not saying that they don't apply it. What I'm asking for it is prior extraction, and then those that policy will be met. Then,

1:09:40
sorry, are you able to explain why you consider that the provisos don't apply? the the provide the the the policy M has provisos in it. Policy M H has provisos. It says that. Mineral resources in the mineral safeguarded areas shown on the policy's map are safeguarded for possible future use, and that development that would prevent or otherwise hinder the possible future working of the mineral will not be permitted. But there are provisos unless it can be shown that the site has been allocated for development in an adopted local plan or neighbourhood plan, or the need for the development outweighs the economic and sustainability considerations relating to the mineral resource, or that the mineral will be extracted prior to the development taking place. Now, my understanding is that the applicant argues that those provisos do apply, but my understanding is that your argument is that they don't, and that these areas are safeguarded. And I would like if you could explain why that is the case.

1:10:54
What I'm saying is is that we would like prior extraction to happen in accordance with that policy.

1:11:12
But you're not telling me why those provisos don't operate. But you you are saying that you intend to extract prior to development.

1:11:24
No, no, no. Policy eight is is is for safeguarding a mineral area unless those provisos have been met. So what I'm saying is that the mineral could be prior extracted, and then that policy will be met.

1:11:53
Right. Thanks.

1:12:06
Could I

1:12:06
also ask Smith and Sons a couple of other questions, please? Firstly, what the current planning status of the proposed Westside extension is, and what you mean by partially sterilised? I understand that the current planning status that you have you have in mind a proposed Western extension.

1:12:36
Yes, as I said, we're in the early stages of looking for a replacement site for Dewar's Farm Quarry, and we've identified that area to the west as one of those possible sites. So we will be looking at a future extension onto that that area, but obviously, where we are at the at the moment, we're not in a. There is no allocation for it at the moment, and that will be something that we would be promoting when Oxfordshire call for sites as part of their minerals and waste local plan process.

1:13:21
Thank you. Could I make comment now from host authorities, please? And if there's anything you want to sweep up that you didn't before, then please do so.

1:13:40
Thank you, George Gurney, Oxford County Council. The first point I was. Please

1:13:44
speak up, please. It's not very clear into the microphone. Thank you.

1:13:46
Apologies, George Gurney, Oxford County Council.

1:13:49
Thank you.

1:13:49
There was. We'd like to come back on that point about policy M8, but also there was a point mr. Booth made earlier about the fact that mineral sterilisation isn't avoidable, and there was a point that I made in issue-specific hearing one about the steps that the applicant had taken to seek to avoid sterilisation of minerals resources in the site selection process, and the the request for a bit of clarity as to how minerals resources were considered in the site selection process for the site to avoid the sterilisation in the in the first place. But I hand over to my colleague to discuss policy M8.

1:14:28
Debbie Prince, Oxfordshire County Council. Yes, with regard to to policy M8 and the the need for the development outweighing the economic and sustainability considerations relating to the mineral resource, it is usual in the the implementation of this policy that the district council or whoever is the local authority dealing with the. Application that the the need for the development outweighing the the impact on the on the mineral resource is is given to them. So that is a a decision really that I would expect that the examining authority pins and the minister would would draw to a conclusion during their decision-making process.

1:15:40
Thank you. I'm just trying to get as best a best a handle I can on what the position is. Bearing in mind the ground seems to be moving because you've got new stuff coming in, but for the moment we deal with what we've got. So, is that anything else you want to say on what we've just heard?

1:16:00
Thank you. Yeah, I think that was it from us.

1:16:02
Thank you. So, obviously, applicant, if you'd like also to respond, please.

1:16:08
Thank you very much, Sir Alexander Booth, on behalf of the applicant. And in relation to the site selection process point raised by mr. Gurney, I'm going to turn to mr. Harley in a moment. But just very briefly, so on policy M8, I mean, the XA is clearly seized of our position, which is that we do say that policy M8 is satisfied insofar as that policy expressly provides for development in a safeguarding area to be permitted in circumstances where the need for the development outweighs the economic and sustainability considerations relating to the resource, and so in that regard, chiefly we point to the compelling need for a facility such as this one, as identified in the national networks NPS. So we do say, sir, that we satisfy that second bullet point. Before I go further, though, in relation, but before I turn to Miss Harley, I'm just going to turn to Miss Hutton, who has a further observation in relation to the proposed extension, as discussed in the representation from Smith and Son.

1:17:15
Thank you, mr. Booth. Laura Beth Hutton for the applicant. Just wanted to make the ex-arey. aware that the applicant isn't aware that the citizens has any land agreement with with the landowner in respect of any such extension, and of course, as confirmed at compulsory acquisition hearing one, and in our response to written representations document 11.5 at deadline two, and we do the applicant has agreed heads of terms with the landowner, and detailed legal negotiations are underway in respect of that land.

1:17:51
So, so the position in summary is that while Smith and Sons might hold an aspiration to work that land, I mean, they have no right in property to do so, and indeed, we have an agreement. We have a an agreement is progressing with the landowner, in terms of terms as Ms Hutton's just explained. So we have an ongoing relationship with the landowner in that regard, and in any event, there is no permission, there is no allocation, there isn't even a draft allocation for development of the type anticipated by Smith and Sons. Beyond that, I just want to turn to mr. Harley.

1:18:36
Thanks, Steve Harley, for the applicant. I think the points about policy M8 safeguarding, thanks, thanks Rory, have generally been been covered. Yeah, we we would say that we are doing some extraction as part of the construction process, which minimises harm, and and and therefore that. But the main hook in policy M8 is that point about need, which you just heard, and the very compelling need identified through the MPS. I just wanted to come back to the question, and mr. mr. Gurney is correct. Actually, it's a point you raised earlier earlier in the examination process. Our alternative sites process didn't didn't make explicit reference. You're in the site assessment report. You'll not find an explicit reference to to minerals, but you do find a reference to general other safeguarding policies, and and that's a bit of a catchall for and a range of other local policies, including things like policy M8. So it wasn't that it was completely ignored, but I think as we discussed at ISH, and I'm sorry, sir, either have been one or two. I can't remember, but the first week of hearings, we discussed at some length then the process we'd undertaken to select the sites and the and the key considerations we had to look at in order to deliver a SRFI which meets the tests of government policy and the MPS and the Planning Act, and key criteria unavoidably drive that process, and those are at the very heart of its access and proximity to both strategic roads. Down rail networks, and they, and I think I used the phrase last time, sort of trump a lot of other things. Albeit those other things can be very important and not to be downplayed. So hopefully that that gives a bit more clarity. It wasn't there was completely ignored, but neither was it given particular weight. And we would say we can't locate. We could not locate this scheme on a on a better or more suitable site than we than we have, there are no alternatives that would deliver a sustainable

SRF in the way that this site does. So, in that context, some sterilisation is unavoidable, and I think that's that's the the point that mr. Boud was making.

1:20:38
Thank you. Anything else from the applicant?

1:20:41
No, no, sir. Unless you want to hear from me again, but I shouldn't let you do it. No, I've said all I need to say. Thank you, sir.

1:20:46
Thank you. Final part of this agenda item is concerns the Middleton Stoney Relief Road. Smith and Sons is concerned that the proposed bypass of Middleton Stoney would reduce the available tonnage of the southerly extension, which it is planning, in which it promoted to Oxford County Council in April 2023, and it would reduce from 2.2 million to 1 million tonnes, which it says would make it uneconomic. So, just questions to Smith and Sons, if I may, two quick questions. Firstly, can you tell us what the current planning status of the proposed southern extension is, and can you tell us what you mean by Earmarked.

1:21:45
I think we've probably already covered this. There is, as you're aware, no current Oxfordshire Minerals and Waste Local Plan that has current, up-to-date allocations in it. They called for sites in 2023, which we proposed this site. So, in terms of actual allocations, there there isn't any. I would just like to come back on what the applicant has said regarding a land agreement. We also have agreed heads of terms for this area and have draft leases in place, which are at a very advanced stage of agreement. So, you know, landowners obviously playing somebody off, but you know we've been in discussions with the landowner on this land for a number of years. But in in terms of planning, the applicant is right that you know there is no current allocation for the site.

1:23:02
Thank you. So, could I then ask the host authorities again if they'd like to comment on this final part of this item? If there's anything you wish to add,

1:23:18
Debbie Prince, Oxfordshire County Council, just to say that the area of the Middleton Stoney proposed relief road is in the mineral safeguarding area. That's all I'd like to add.

1:23:33
Sorry, I didn't quite catch that at the end. The proposed relief road is

1:23:37
is in the mineral safeguarding area.

1:23:41
Thank you. So, could we have looking please respond, please? Thank you.

1:23:52
Thank you so much. I think I can do that very briefly, really, because as Miss Davis says, we've we've covered a lot of this already. I think it's. She very fairly said that there is no allocation for this land within the Mineral Song Waste Local Plan, and that is right. No allocation, no draft allocation, no planning

permission, or indeed planning application. So it is very much an aspiration, and nothing more than that. We do say. What's further said is that the route, the alignment of the relief road, would result in the sterilisation of part of the reserve, meaning that there was only a million tonnes available for extraction, and that that wouldn't be viable. Now, I mean, the only short observation I would make in that context is that that is an assertion. I mean, there isn't an evidential platform before the examination to make good that proposition. It's just said that that wouldn't be viable, and that is an assertion. All these, I understand. I'm sure it comes from Miss Davis in good faith. Beyond that. Sir, there's nothing further that I can add. I don't know if mr. Harley would wish to add anything in that context.

1:25:09
No, thank you, sir.

1:25:11
Thank you. Do the host authorities or Smith and Sons have any final comments before I close this item?

1:25:28
No.

1:25:31
No. Thanks very much indeed for all of our citizens parties, and that concludes item 3.3.

1:25:42
I'm thinking now might be a reasonable time for a break, but I'm also conscious that mr. Stuart Irvine from Biffa has got to about half past four. So what I'm going to suggest is we just take sort of a short 10 minute break to make sure then we've got got enough time to ensure we can we can fit in the next item before mr. Stuart Irvine needs to to disappear off. So what I suggest is we take in nine and a half minutes. To be frankly honest, but if we come back at 25 to to four, that'd be great. Okay, the hearings adjourned till 25 to four.