

THE OXFORDSHIRE COUNTY COUNCIL (DIDCOT GARDEN TOWN HIGHWAYS INFRASTRUCTURE – A4130 IMPROVEMENT (MILTON GATE TO COLLETT ROUNDABOUT), A4197 DIDCOT TO CULHAM LINK ROAD, AND A415 CLIFTON HAMPDEN BYPASS) COMPULSORY PURCHASE ORDER 2022

THE OXFORDSHIRE COUNTY COUNCIL (DIDCOT TO CULHAM THAMES BRIDGE) SCHEME 2022

THE OXFORDSHIRE COUNTY COUNCIL (DIDCOT GARDEN TOWN HIGHWAYS INFRASTRUCTURE – A4130 IMPROVEMENT (MILTON GATE TO COLLETT ROUNDABOUT), A4197 DIDCOT TO CULHAM LINK ROAD, AND A415 CLIFTON HAMPDEN BYPASS) (SIDE ROADS) ORDER 2022

THE CALLED-IN PLANNING APPLICATION BY OXFORDSHIRE COUNTY COUNCIL FOR THE DUALLING OF THE A4130 CARRIAGEWAY, CONSTRUCTION OF THE DIDCOT SCIENCE BRIDGE, ROAD BRIDGE OVER THE APPLEFORD RAILWAY SIDINGS AND ROAD BRIDGE OVER THE RIVER THAMES, AND ASSOCIATED WORKS BETWEEN THE A34 MILTON INTERCHANGE AND THE B4015 NORTH OF CLIFTON HAMPDEN, OXFORDSHIRE (APPLICATION NO: R3.0138/21)

PLANNING INSPECTORATE REFERENCE:

APP/U3100/V/23/3326625 and NATTRAN/SE/HAO/286 (DPI/U3100/23/12)

Rebuttal proof of evidence of

ARON LESLIE WISDOM

(Strategic Needs and Benefits, Highway Issues, Scheme Selection and Alternatives)

regarding identification and need for Scheme, the optioneering process, highway performance with the Scheme, the preferred Scheme and alternatives

1. SCOPE OF EVIDENCE

- 1.1. This Rebuttal Proof of Evidence has been prepared regarding matters relating to the identification and need for the Scheme, the optioneering process, highway performance with the Scheme, Scheme selection and alternatives, raised by:
 - 1.1.1. Mr Roger Turnbull on behalf of East Hendred Parish Council (EHPC);
 - 1.1.2. Councillor Casey-Rerhaye on behalf of the Neighbouring Parish Councils Joint Committee (NPC-JC);
 - 1.1.3. Mr Alan James, Mr Russell Harman and Mr Chris Hancock on behalf of the Neighbouring Parish Council's Joint Committee (NPC-JC);
 - 1.1.4. Mr Richard Tamplin on behalf of Planning Oxfordshire's Environment and Transport Sustainably (POETS); and
 - 1.1.5. Representations from Commercial Estates Group Limited (CEG).
- 1.2. The purpose of this rebuttal evidence is to present my opinion as to the validity of concerns raised and to clarify any points of potential confusion.
- 1.3. The aim of this Rebuttal Proof of Evidence is to respond to a number of points that have not already been addressed in my main proof of evidence, to provide further clarification of my evidence or to correct misapprehensions within evidence presented by other parties. I have sought to avoid unnecessary repetition of matters already addressed at length, with the ultimate intention of assisting the Inquiries. Where I do not respond to a point raised by another party, my lack of response should not be construed nor interpreted as agreement, unless explicitly stated so within this Rebuttal Proof of Evidence.

2. IDENTIFICATION AND NEED FOR SCHEME

- 2.1. In Mr Turnbull's Proof of Evidence at paragraph 3.4 and Table 4a, he discusses trend-based assumptions. It is unclear what the purpose of this evidence is. As shown in my main Proof of Evidence (paragraph 4.26), the Office for National Statistics (ONS) issues caution with figures, given the recovery from a global pandemic. However, Mr Turnbull does make a very pertinent point in Table 4a that car journeys have recovered much more quickly than public transport compared to pre-COVID levels. This will undoubtedly have a negative impact on the highway network. Additionally, road traffic levels across the Didcot area are now reaching pre-pandemic levels, as highlighted in the appendices to Claudia Currie's Proof of Evidence (CC2, p.55 – 57).
- 2.2. At paragraph 4.13 of Mr Turnbull's Proof of Evidence, he contends that due to changes in travel habits since the global pandemic, the traffic data is out of date. What Mr Turnbull fails to recognise, but that other objectors do, is that without additional growth, traffic is already at a level that is unacceptable to the Local Highway Authority, as discussed in my main Proof of Evidence (paragraph 4.26). As Mr Turnbull's Proof of Evidence has demonstrated, car traffic has recovered much more quickly than other modes and we can expect this trend to continue in the absence of other options. It is, therefore, safe to assume that as housing and employment growth continues at pace, so will traffic. In this context, my view, therefore it is wholly appropriate to take 2017 traffic levels, including appropriate growth, as a baseline.

3. THE OPTIONEERING PROCESS

- 3.1. Several proofs of evidence allege the insufficiency in the optioneering process or query why some options were progressed over others. Section 8 of my main Proof of Evidence covered optioneering at length. Whilst I will not rehearse this issue again in detail in this Rebuttal Proof of Evidence, it is worth clarifying certain points.
- 3.2. Councillor Casey-Rerhaye suggests that land was safeguarded for a route for the Didcot to Culham River Crossing initially to the east of the railway line and that a “new” route was proposed much later (paragraphs 4 and 5). This is incorrect. As per Section 8 of my main Proof of Evidence (paragraphs 8.64 to 8.67) and CDA.19, a ‘western’ route was promoted at the same time as the ‘eastern’ routes. At the time of the development of the SOLP 2035, two emerging preferred routes were safeguarded due to the optioneering not being completed. Whilst more than one route was still possible, all possible routes were safeguarded in local plans with the intention that one route would ultimately be discounted. The revised Alignment 6 (moving the Didcot to Culham River Crossing further away from Appleford north of the Appleford Sidings) was a further iteration in part due to consultation responses from Appleford (see paragraphs 8.64 to 8.73 of my main Proof of Evidence). With regard to the revised Alignment 6, the Applicant was responding to requests from consultees, wherever possible, and this is in accordance with what the NPC-JC is seeking (ibid paragraphs 8.79 to 8.94).
- 3.3. In Councillor Casey-Rerhaye’s Proof of Evidence at paragraph 5, she states that:
- “An originally proposed route to the east of the railway that would have been further away from existing housing, quarries, Appleford sidings and ponds, was dismissed for apparently weak reasons of issues with ancient land works and views from the North Wessex Downs National Landscape (NWDNL). Extremely large and high new buildings on Culham Science Centre are more intrusive on the views from Wittenham Clumps and NWDNL but have been given planning permission. The least disruptive route for villages and the most convenient for the growth at Culham Science Centre and Culham new residential site would be due south from the entrance to Culham Science centre connecting to Sires Hill/Ladygrove junction. (Issues 4,11,13) Evidence: Screenshot of Google maps/HIF1 map (Appendix C)”*
- 3.4. It is unclear what evidence underpins these assertions, whereas a wealth of evidence related to transport (including traffic modelling), environment and ecology, and historic and natural assets was used to establish the preferred option. Further to this, Councillor Casey-Rerhaye fails to recognise that options further west are closer to properties in Long Wittenham and would, more importantly, involve construction on significantly greater amounts of greenfield land compared with the preferred route, which utilises a significant amount of brownfield land, and should be prioritised for development in accordance with policy in the NPPF. Additionally, the options were further reviewed by two external consultants in the Extended Feasibility Appraisal Work undertaken by Glanville in June and July 2018, which was then peer-reviewed by Waterman (CDA.19).
- 3.5. In his Proof of Evidence, Mr Harman has made assertions with regards to the development of the Sutton Courtenay Roundabout and its impacts. Whilst information regarding the reasons behind the proposed implementation is covered in my main Proof of Evidence (paragraphs 8.67 – 8.72), it is important to clarify matters in this Rebuttal Proof of Evidence. It is not correct that the “...the B4016 Sutton Courtenay Roundabout came into existence as a Value Engineered solution by the Applicant” (section 5.2, p.18 of Mr Harman’s Proof of Evidence). First, as per Sections 8 and 13 of my main Proof of Evidence, the junction of the B4016 of the Didcot to Culham River Crossing with Sutton Courtenay evolved from a single roundabout junction to serve both Appleford and Sutton Courtenay (and situated much closer to Appleford) in the early optioneering exercises. The route was then moved further away from Appleford with two separate T-junctions – one to serve Appleford and one to serve Sutton Courtenay. However, traffic modelling demonstrated that a roundabout would be required to serve Sutton Courtenay

to accommodate the level of traffic expected and encourage use of the new Didcot to Culham River Crossing, rather than the existing Culham Bridges. It is, therefore, unclear how Mr Harman has derived his assertion that it was as a result of value engineering, particularly given that a roundabout junction is generally more expensive than a priority T-junction.

- 3.6. Additionally, Mr Harman suggests that the Scheme will encourage more traffic through Sutton Courtenay, which will therefore impact on safety. It is unclear what evidence Mr Harman uses to make this assertion other than existing congestion within the village, which the Applicant acknowledges. However, traffic modelling shows that fewer vehicles will route through Sutton Courtenay and therefore a better network performance in a 'with Scheme' scenario as opposed to a 'without Scheme' scenario (see Table 6.17, p.95 of CD A.7).
- 3.7. Mr Harman suggests the existing congestion has led to increases in traffic safety related incidents. This can be a particular issue with drivers wanting to travel west to east on Appleford Road in the morning peak period. Drivers currently get frustrated by queuing traffic from Culham Bridges and this leads to overtaking manoeuvres, which can be in conflict with traffic exiting from Abingdon Road. Furthermore, queuing traffic does not encourage active travel, especially cycling, due to the need to filter through traffic queues on narrow village roads. The current queuing traffic also encourages drivers to 'rat-run' through even smaller roads via The Green, Churchmere Road and All Saints Lane (best described as narrow lanes – see Figure 1) to avoid queues on Church Street and Appleford Road. The Scheme will remove traffic queues through Sutton Courtenay and thereby resolves many of the concerns raised by Mr Harman.



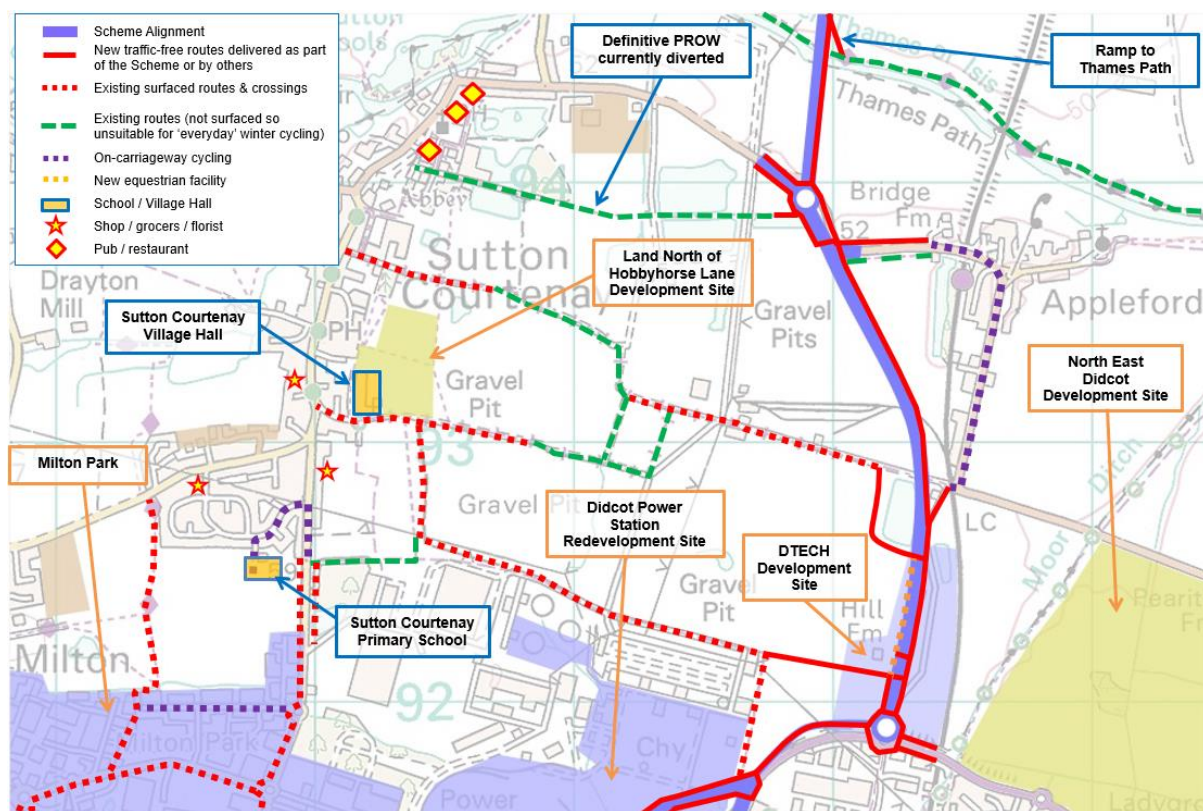
Figure 1: Inappropriate lanes being used to bypass queues in Sutton Courtenay

4. HIGHWAY PERFORMANCE WITH THE SCHEME

- 4.1. At paragraph 6 of Councillor Casey-Rerhaye's Proof of Evidence, she contends that with:

"at least half of the new houses in NE Didcot development, the obvious route to access the new HIF1 road/Thames bridge will be to go THROUGH Appleford village (B4016), so they can use the bridge to access Culham Science Centre and the Europa school and the new proposed secondary school at the Culham residential site (Issues 2,6.7,14) Evidence: as above."

- 4.2. It is unclear what evidence is provided for this assumption apart from a screenshot of Google Maps' aerial view. Regardless, without the Scheme, those same residents would travel through either Appleford or Long Wittenham/Clifton Hampden anyway. Indeed, transport modelling shows that significantly less traffic will travel through the villages in the vicinity of the Scheme, with a much better overall network performance in 2034, in a 'with Scheme' scenario compared to a 'without Scheme' scenario. Specifically, in 2034 it is predicted that there will be a 64% reduction in traffic on the B4016 in Appleford; 49%, 47% and 23% less traffic on the High Street, Harwell Road and B4016 Church Street respectively in Sutton Courtenay; a 77% reduction on the B4016 through Long Wittenham and Clifton Hampden; and a 70% reduction on Tollgate Road in Culham (see Claudia Currie's appendices – CC2, Table 3.1 p.89 to 91 and Table 3.3 p.93 to 95. See also Figure 16.4 of ES Chapter 16 CD A.15.16, p.17 and Table 6.17 of CD A.7, p.95). Additionally, the Scheme provides significantly better active travel and public transport provision which will reduce the number of people who would otherwise be making these journeys by car in the 'without Scheme' scenario.
- 4.3. The Applicant offered Appleford Parish Council (**APC**) complementary interventions that were particularly related to restricting traffic on the Appleford railway bridge. These interventions would, at the same time, provide improved pedestrian access to Appleford Station and deter traffic. Whilst APC wanted to explore this, some residents objected and could not agree so the proposal was not taken forward as part of the Scheme. Interestingly, APC has previously requested a roundabout instead of the proposed T-junction and this is inferred in the NPC-JC Statement of Case [CD L.6, p.21] in which they suggest that a T-junction would be dangerous for traffic heading to Sutton Courtenay. The Applicant suggested during extensive engagement with APC that a roundabout was not required in traffic terms (due to the relatively low flows) and would likely encourage more traffic through the village. The idea is to make the new Didcot to Culham River Crossing as attractive as possible, and other routes less attractive, to encourage traffic away from villages. Councillor Casey-Rerhaye does make a good point (at paragraphs 6 and 7) in that, in a 'without Scheme' scenario, all traffic heading north will travel through local villages with limited choice of alternative modes. This will be more pronounced without the Scheme.
- 4.4. Councillor Casey-Rerhaye and Mr Hancock raise concerns in their respective Proofs of Evidence about access to destinations in Sutton Courtenay (including the primary school) from Appleford, and that the new Didcot to Culham River Crossing will make this more dangerous and disruptive for "typical journeys", especially for children being driven to school. Councillor Casey-Rerhaye concedes that these children are already driven due to the lack of alternatives (paragraph 7 of Councillor Casey-Rerhaye and section 1.43 of Mr Hancock's proofs of evidence). First, the Scheme has been (and will continue to be) road safety audited to ensure that any safety implications are identified and addressed. Councillor Casey-Rerhaye concedes that not many people walk, cycle or take the bus from Appleford to Sutton Courtenay currently (paragraph 7). Whilst other members of the NPC-JC infer these are well used routes (CD J.11, p.3). However, what Councillor Casey-Rerhaye fails to acknowledge are the improved active travel connections that the Scheme provides and enabling a more comprehensive network of routes, which, by her own admission, will be a vast improvement on what is provided currently. I reference a new, largely traffic free route that the Scheme provides, which will enable active travel provision to Sutton Courtenay Primary School, Milton Park and other destinations, from Appleford (see Figure 2).



- 4.5. As Figure 2 demonstrates, with the Scheme, there will be ample opportunity to walk and cycle between the villages of Appleford and Sutton Courtenay with adequate crossing facilities. The Scheme will provide a largely traffic-free route that can be used all-year round to several destinations, including Milton Park. It is, therefore, without foundation for Councillor Casey-Rerhaye to assert that there are no plans for any walking and cycling routes and that the *“proposed HIF1 route means children being driven to school in Sutton Courtenay have to cross over a 50-mph main road at rush hour each morning. The road cuts off the natural connections between these two villages and the use of the facilities in Sutton Courtenay by Appleford residents – pubs, restaurants and shop which are lacking in Appleford (Issues 1,2,3)”* (paragraph 7).
- 4.6. Notwithstanding the above, the North East Didcot development site, currently under construction, will also provide many of these facilities and services including shops and schools (primary and secondary) in closer proximity to Appleford than Sutton Courtenay (see Figure 3). However, Milton Park via Sutton Courtenay will still be a key destination as a major employment site in the area so still important to be linked by usable active travel routes.



Figure 3: North East Didcot Masterplan (source: Approved Masterplan Planning ref: P15/S2902/)

- 4.7. In CEG's Interested Third Party Statement, dated January 2024 to the Call-in Inquiry at paragraph 4.14, CEG states:

"Given the current use of the Culham No.1 site there is some redevelopment potential before any transport interventions (in essence, the HIF1 works) are necessary. This point has been agreed with South Oxfordshire District Council and Oxfordshire County Council as part of pre-application discussions pursuant to the No.1 application. However, the HIF1 Scheme is required to enable the delivery of the totality of the STRAT9 allocation."

- 4.8. Whilst CEG is correct in its assumption that some development can commence on the Culham No.1 site due to extant uses and therefore existing trip generation, this level of development would be limited to those existing trips prior to the Scheme being implemented (or with certainty and confidence of the Scheme delivery), as per the Development Release Strategy (see the appendices to my main Proof of Evidence at AW2.2). The spirit of the Development Release Strategy is that Oxfordshire County Council will accept some development (commercial and residential) prior to the Scheme being implemented in the knowledge that unmitigated impacts would only be short-lived. If the Scheme was not to progress, the Development Release Strategy would likely need to be abandoned.
- 4.9. In Mr James's Green Belt Proof of Evidence (paragraph 26), he refers to a Transport Assessment Addendum (TAA) produced by BSP (dated 24 November 2021). However, no information is provided as to which planning application this TAA relates. Nevertheless, it has been ascertained that it was submitted in support of an application for a research and development building with a gross internal area of 9,870sqm and an associated multi-storey

car park (see application ref: P21/S1257/FUL) at Culham Science Centre. In paragraphs 26 and 27 of Mr James's Proof, he states:

"26. CSC itself produced a Transport Assessment (TA), BSP Addendum Transport Assessment, latest version 24 November 2021, which casts doubt on many of the LPA SoC assertions. See in particular section 6, with many of the findings reported in section 7 'Conclusions'. The TA models traffic flows across the network between Abingdon and the A4074 and including the existing Thames bridges. It models pre-HIF1 scenarios for 2021, 2024 with other committed development, and 2024 with committed development plus site development. These are also modelled for post-HIF1 with the addition of a 2034 scenario.

27. The CSC TA6 concludes that in general the CSC development has only marginal effects on capacity across the network..."

- 4.10. However, these conclusions to which Mr James refers are only made in respect of the proposed development in question, which is only one part of all of the expected future employment growth at Culham Science Centre and the allocated housing in the South Oxford Local Plan at Land adjacent to Culham Science Centre. Furthermore, the latest version of this document is in fact dated 31 March 2022 and, therefore, the document referred to in Mr James's Proof of Evidence has been superseded. As such, any conclusions drawn in the BSP 2021 TAA are now out of date.

5. SCHEME SELECTION

- 5.1. In Mr Hancock's Proof of Evidence at paragraph 4.3.3 he states:

"The HIF1 road proposal, ultimately providing a dual carriageway arterial link between the A34 and east Oxford/ M40, will increase reliance on vehicle use for both commuting and freight handling."

- 5.2. This is incorrect. Only the A4130 element of the Scheme is proposed to be dual carriageway. This equates to only approximately 1.5km being dual carriageway, or approximately 10% of the Scheme.

6. ALTERNATIVES

- 6.1. In his Proof of Evidence Mr Tamplin discusses reconfiguring and traffic signals on Abingdon Bridge (paragraph 5.5). Setting aside that this was required as part of recent essential maintenance works, it is unclear how traffic signals on Abingdon Bridge would help a strategy for the Didcot area. Any strategy for Abingdon will need to be developed and adopted by Oxfordshire County Council, as Local Highway Authority, in due course and is not, therefore, a matter for this Inquiry.
- 6.2. When discussing an alternative strategy, not just for Didcot but for Abingdon as well, Mr Tamplin discusses cost and deliverability (paragraphs 5.6 to 5.17). First, the rail elements are outside of the control of the Applicant. Furthermore, in line with the conclusions of the Oxfordshire Rail Corridor Study (CD G.17 pages 63-64), it is understood that Network Rail has no intention of four-tracking the Cherwell Valley Line any further south than Radley. Also, the electrification of the line from Didcot Parkway to Oxford has been deferred indefinitely, even though stanchions have been erected with work to certain structures, with any future proposal being subject to a new business case and certainly not prior to the Oxford Station redevelopment. Secondly, Mr Tamplin claims that it would be affordable but has not provided any costs to evidence this claim. Mr Tamplin freely admits that he has not proposed a strategy for the whole Science Vale area and, instead, concentrates on Abingdon, which does not address the issues that are the focus of the Scheme.
- 6.3. At paragraph 5.17, Mr Tamplin goes on to say that the A4130 Widening would not serve Milton Park nor would it serve Didcot A by relieving (what I assume to be reference to) Basil Hill Road. Milton Park has its own access over the railway line leading to Milton Park's private road (Park Drive). The Didcot Science Bridge links the Didcot A Power Station site with existing and proposed residential sites to the south of the A4130. It also relieves Manor Bridge and Power Station roundabouts, which at the same time relieves Basil Hill Road. However, by relieving Manor Bridge and Power Station roundabouts, there is an opportunity to close Basil Hill rail bridge to all but buses, cyclists and pedestrians (although not part of the Scheme). This route is identified as primary route 17 in the Didcot LCWIP (CD G.4.1). This is one of the many examples of how the Scheme can enable better walking and cycling infrastructure and bus services within and outside of Didcot.
- 6.4. Mr Tamplin discusses his third level of sustainable transport system that provides for good network of walking and cycling routes that benefit from a "sense of personal security and safety" and these are well established "urban design principles" (paragraph 5.5). As demonstrated in Figure 2 of this Rebuttal Proof and in my main Proof of Evidence (paragraphs 11.18 to 11.33), the scheme does provide and enable an excellent network of walking and cycling routes. However, it should be remembered that part of the Scheme is not in an urban area for urban design principles to apply. This is why, in part, the walking and cycling infrastructure is adjacent to the new carriageway (with buffers) to provide a form of natural surveillance. This level of natural surveillance cannot be provided next to railway lines or guided busways with only intermittent services passing.
- 6.5. In Section 5 of Mr Turnbull's Proof of Evidence, he describes the competitiveness of bus and cycle travel versus car travel. I agree with Mr Turnbull that, currently, private car is more competitive than other modes. This is largely due to current congestion and a lack of safe, direct and convenient cycle routes. I have highlighted the challenges of providing good quality walking and cycling infrastructure as well as bus journey time reliability on the existing network in my main proof of evidence at Sections 4 and 6 and how addressing these issues forms a fundamental part of the Scheme. The issues related to bus services has been adequately covered in the representations of Oxford Bus Group (CD N.7).
- 6.6. Additionally, Mr Turnbull compares the Science Vale with compact urban centres, such as Cambridge and Oxford. This is simply not an appropriate comparison in transport planning

terms. Mr Turnbull seems to imply that a traffic filter scheme¹, similar to that proposed in Oxford, could work in the Didcot area. As the Transport and Infrastructure Programme Lead for Oxford (and therefore leading on the Oxford Traffic Filter scheme), I can categorically confirm that this is not the case. The Traffic Filter scheme is being undertaken as a trial. This is largely because of the expected reassignment of traffic to the Oxford ring road, which is a dual carriageway. Whilst traffic is largely expected to reduce within the Oxford ring road, the traffic filters alone will not remove traffic completely, with traffic likely to increase towards the edge of Oxford – these areas are also important for bus services. Whilst this has been, or will be, mitigated to a degree by additional bus priority measures where capacity allows (e.g., A44 and Woodstock Road bus lanes) and incremental capacity enhancements to junctions around the ring road in recent years, there is still expected to be an increase in traffic on the already congested ring road, which may impact on bus services. The Science Vale area, particularly to the north of Didcot, does not have the alternative routes or capacity to reassign traffic without detrimental impacts on other urban areas, namely Abingdon and Wallingford. Oxford also benefits from a much larger population over a smaller geographical (urban) area, with an extensive and frequent bus network and two railway stations with frequent rail services to multiple destinations. This makes walking, cycling, bus and train travel much more accessible and more realistic options than in a largely rural area without the infrastructure and public transport services of a city. It would be wholly inappropriate to suggest a trial in Oxfordshire's largest urban area could work in a largely rural area without establishing it would work in Oxford first.

¹ Filtering most private car traffic on six roads, within the city, at certain times of the day, similar to existing bus gates but with other traffic, such as vans and lorries, allowed to pass through during the hours of operation. All areas of the city will be accessible but with slightly longer journeys for those that are not exempt or do not use a permit. The trial is due to start in autumn 2024 for a maximum of an 18-month trial whereby a decision will be required on whether to make the trial permanent or not.

7. STATEMENT OF TRUTH AND DECLARATION

- 7.1. I confirm that, insofar, as the facts stated in my rebuttal evidence are within my own knowledge, I have made clear what they are and I believe them to be true and that the opinion I have expressed represent my true and complete professional opinion.
- 7.2. I confirm that my rebuttal evidence includes all facts that I regard as being relevant to the opinions that I have expressed and that attention is drawn to any matter which would affect the validity of those opinions
- 7.3. I confirm that my duty to the Inquiry as an expert witness overrides any duty to those instructing or paying me, and I have understood this duty and complied with it in giving my evidence impartially and objectively, and I will continue to comply with that duty as required.
- 7.4. I confirm that, in preparing this rebuttal evidence, I have assumed that same duty that would apply to me when giving my expert opinion in a court of law under oath or affirmation. I confirm that this duty overrides any duty to those instructing or pay me, and I have understood this duty and complied with it in giving my evidence impartially and objectively, and I will continue to comply with that duty as required.
- 7.5. I confirm that I have no conflicts of interest of any kind other than those already disclosed in this rebuttal evidence.

ARON LESLIE WISDOM

9 February 2024