

Chiltern Railways

**THE CHILTERN RAILWAY COMPANY LIMITED ("CRCL")
 PROPOSED CHILTERN RAILWAYS (BICESTER TO OXFORD IMPROVEMENTS) ORDER
 UPDATE OF CRCL'S RESPONSE TO THE SECRETARY OF STATE'S STATEMENT OF MATTERS**

The table below sets out where CRCL have responded in CRCL's Proofs of Evidence and through submissions to the Inquiry to the matters set out in the Secretary of State's Statement of Matters. Please note this document only refers to the Core Documents in relation those further Core Documents submitted by CRCL during

Secretary of State's Statement of Matters matter	CRCL's response in the Proofs of Evidence
<p>(1) The aims and objectives of, and the need for, the proposed connection between the London to Birmingham railway and the Bicester to Oxford railway and the proposed improvements to the line between Bicester Town station and Oxford station ("the scheme").</p>	<p><u>STATEMENT MATTER 1</u></p> <p>Witness documents:-</p> <ul style="list-style-type: none"> • Proof of Evidence of Graham Cross (CRCL/P/1/A) - Sections 3, 4, 5, 8 and 9. • Note by Graham Cross to the Inspector on DfT BCR approval thresholds (CRCL/P/1/E). • Note by Graham Cross on the regulation of access to the rail network and consultation (CRCL/P/1/F). • Proof of Evidence of Allan Dare (CRCL/P/2/A) - Sections 2, 3 and 4. • Appendices of Alan Dare (CRCL/P/2/B) - Appendix 1 and 4. • Proof of Evidence of Neil Gibson (CRCL/P/3/A) - Sections 2 and 3. • Proof of Evidence of Patrick O'Sullivan (CRCL/P/4/A) - Section

Secretary of State's Statement of Matters matter	CRCL's response in the Proofs of Evidence
<p>(2) The justification for the particular proposals in the draft TWA Order, including the anticipated transportation, regeneration, environmental and socio-economic benefits of the scheme.</p>	<p>10.</p> <ul style="list-style-type: none"> • Appendices of Patrick O'Sullivan (CRCL/P/4/B). <p>STATEMENT MATTER 2</p> <p>Witness documents:-</p> <ul style="list-style-type: none"> • Proof of Evidence of Allan Dare (CRCL/P/2/A) - Sections 3, 4, 5, 6, 7 and 9. • Appendices of Allan Dare (CRCL/P/2/B) - Appendix 1, 2, 3, 4, 5 and 6. • Proof of Evidence of Leo Eyles (CRCL/P/5/A) - Section 4. • Appendices of Leo Eyles (CRCL/P/5/B). • Note by Leo Eyles on Capital Cost Price Base (CRCL/P/5/E). • Proof of Evidence of Stephen Barker (CRCL/P/6/A) - Section 4. • Proof of Evidence of Paul Tregear (CRCL/P/8/A) - Sections 6, 7 and 9. • Note by Paul Tregear response to Inspector's questions on Bicester station car parking (CRCL/P/8/E). • Proof of Evidence of Ian Gilder (CRCL/P/12/A) - Section 2. • Note by Ian Gilder on East-West Rail (Western Section) Planning and Transport Policy (CRCL/P/12/H). <p>CRCL general Inquiry documents:-</p>

Secretary of State's Statement of Matters matter	CRCL's response in the Proofs of Evidence
	<ul style="list-style-type: none"> • Note to the Inspector on evidence of robustness of the business case model (CRCL/INQ/22). • Note responding to Inspector's questions to Mr Eyles following cross-examination by Mr Withrington (CRCL/INQ/71).
<p>(3) The main alternative options considered by Chiltern Railways and the reasons for choosing the proposals comprised in the scheme.</p>	<p><u>STATEMENT MATTER 3</u></p> <p>Witness documents:-</p> <ul style="list-style-type: none"> • Proof of Evidence of Allan Dare (CRCL/P/2/A) - Section 8. • Proof of Evidence of Stephen Barker (CRCL/P/6/A) - Section 4. • Proof of Evidence of Ian Gilder (CRCL/P/12/A) - Section 3, paragraphs 5.17 to 5.57.
<p>(4) The extent to which the scheme would be consistent with national and local planning, transport and environmental policies.</p>	<p><u>STATEMENT MATTER 4</u></p> <p>Witness documents:-</p> <ul style="list-style-type: none"> • Proof of Evidence of Paul Tregear (CRCL/P/8/A) - Section 4. • Note responding to Inspector's questions on the Highway's Agency's response to the further highway traffic assessment (CRCL/P/8/F). • Note responding to Inspector's questions on the validation of Oxfordshire County Council's COTM Model (CRCL/P/8/G). • Proof of Evidence of Ian Gilder (CRCL/P/12/A) - Section 2. • Note by Ian Gilder on East-West Rail (Western Section) Planning and Transport Policy) (CRCL/P/12/H).

<p>Secretary of State's Statement of Matters matter</p>	<p>CRCL's response in the Proofs of Evidence</p>
<p>(5) The likely impact on local residents, businesses and the environment of constructing and operating the scheme, including:</p> <ul style="list-style-type: none"> (a) noise and vibration; (b) impacts on air quality; (c) impacts on water resources and the risk of flooding; (d) impacts on landscape and visual amenity; (e) impacts on cultural heritage and archaeological remains, including the setting of scheduled ancient monuments; (f) impacts on land use, including effects on commercial property and agricultural land and on rights of access; and (g) the effects of the scheme on open space and Chiltern Railways' proposals for providing replacement open space having regard to PPG17: Planning for Open Space, Sport and Recreation. 	<p>CRCL general Inquiry documents:-</p> <ul style="list-style-type: none"> • Note on the saved polices contained in the Cherwell Local Plan and the adopted Cherwell Local Plan (CRCL/INQ/40). • Note on the relevant planning and transport policies (CRCL/INQ/43). • Note on Directions to saving policies in the Oxford and Cherwell Local Plans (CRCL/INQ/82). <p>STATEMENT MATTER 5(a)</p> <p>Core Documents:-</p> <ul style="list-style-type: none"> • Noise and Vibration Mitigation Policy (CD/1.29) and the revised Noise and Vibration Policy (January 2011) (CD/1.29/1 and CD/1.29/2). <p>Witness documents:-</p> <ul style="list-style-type: none"> • Proof of Evidence of Michael Fraser (CRCL/P/9/A) - Sections 3 and 4. <p>CRCL general Inquiry documents:-</p> <ul style="list-style-type: none"> • Note on train service timetable planning (CRCL/INQ/28). • Note on implementation of the noise and vibration mitigation planning condition and policy (CRCL/INQ/31). • Note on refined noise modelling and monitoring (CRCL/INQ/32).

<p>Secretary of State's Statement of Matters matter</p>	<p>CRCL's response in the Proofs of Evidence</p> <ul style="list-style-type: none"> • Note on the offer of vibration monitoring in response to the request from Engage Oxford (CRCL/INQ/45). • Note on example locations of existing riding stables close to high speed railways (CRCL/INQ/53). • Note on identification of train movements during noise measurements as raised Dr C Robertson (CRCL/INQ/57). • Note on revised Noise and Vibration Mitigation Policy (CRCL/INQ/69 and CRCL/INQ/69/1). <p><u>STATEMENT MATTER 5(b)</u></p> <p>Witness documents:-</p> <ul style="list-style-type: none"> • Proof of Evidence of Ian Gilder (CRCL/P/12/A) - Section 10. <p>CRCL general Inquiry documents:-</p> <ul style="list-style-type: none"> • Note on air quality management areas featuring in the Environmental Statement (CRCL/INQ/56). • Note in response to air quality question raised by Dr S Young (OBJ/95) (CRCL/INQ/59). • Note on CRCL's position statement on Natural England's objection in relation to the effects of air emissions on sites of special scientific interest (CRCL/INQ/74). <p><u>STATEMENT MATTER 5(c)</u></p> <p>Witness documents:-</p>
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Secretary of State's Statement of Matters matter	CRCL's response in the Proofs of Evidence
	<ul style="list-style-type: none">• Proof of Evidence of Ian Gilder (CRCL/P/12/A) - Section - 7. <p><u>STATEMENT MATTER 5(d)</u></p> <p>Witness documents:-</p> <ul style="list-style-type: none">• Proof of Evidence of Ian Gilder (CRCL/P/12/A) - Section 8. <p><u>STATEMENT MATTER 5(e)</u></p> <p>Witness documents:-</p> <ul style="list-style-type: none">• Proof of Evidence of Ian Gilder (CRCL/P/12/A) - Section 9. <p>CRCL general Inquiry documents</p> <ul style="list-style-type: none">• Notes to the Inspector on progress with the Scheduled Monument Consent (CRCL/INQ/8 and CRCL/INQ/8/1). <p><u>STATEMENT MATTER 5(f)</u></p> <p>Witness documents:-</p> <ul style="list-style-type: none">• Proof of Evidence of Richard Caten (CRCL/P/11/A) -Section 7. <p>CRCL general Inquiry documents</p> <ul style="list-style-type: none">• Notes on the extent of Grade 3A agricultural land to be taken (CRCL/INQ/18 and CRCL/INQ/18/1).• Note on the case for the grant of compulsory purchase powers in the Order scheme (CRCL/INQ/30).• Plans showing land ownership within the vicinity of Holts Farm

<p>Secretary of State's Statement of Matters matter</p>	<p>CRCL's response in the Proofs of Evidence</p>
<p>(CRCL/INQ/44 and CRCL/INQ/44/1).</p> <ul style="list-style-type: none"> • Note on the powers of compulsory and permanent acquisition in the Order (CRCL/INQ/49). • Note on the exercise of compulsory purchase powers on land at Mansmoor Lane (CRCL/INQ/52). • Note on the ownership of Port Meadow (CRCL/INQ/62). • Note on access routes prior and post scheme – Holts Farm, Manor Farm, Beebont and Home Farm (CRCL/INQ/70). <p><u>STATEMENT MATTER 5(g)</u></p> <p>Witness documents:-</p> <ul style="list-style-type: none"> • Proof of Evidence of Ian Gilder (CRCL/P/12/A) - Section 6. • Note on Gavray Drive Meadows Local Wildlife Site - Impact of the Order scheme (CRCL/P/12/F). <p>CRCL general Inquiry documents</p> <ul style="list-style-type: none"> • Update note on rights sought over Port Meadow (CRCL/INQ/50). 	<p><u>STATEMENT MATTER - 6(a)</u></p> <p>Witness documents:-</p> <ul style="list-style-type: none"> • Proof of Evidence of Paul Tregear (CRCL/P/8/A) - Section 6. <p>CRCL general Inquiry documents</p>
<p>(6) The likely impacts of the scheme on users of the rights of way network, including:</p> <p>(a) the impacts of constructing the scheme on road traffic in the area;</p> <p>(b) the operational effects of the scheme on road traffic,</p>	

<p>Secretary of State's Statement of Matters matter</p>	<p>CRCL's response in the Proofs of Evidence</p>
<p>including the effects of increased closure times at the London Road level crossing in Bicester; and (c) the effects of the proposed permanent closure of road, footpath, bridleway and accommodation level crossings of the Bicester to Oxford railway line.</p>	<ul style="list-style-type: none"> • Note on assessment of traffic likely to be generated at the aggregates depot (CRCL/INQ/83). <p>STATEMENT MATTER 6(b)</p> <p>Witness documents:-</p> <ul style="list-style-type: none"> • Proof of Evidence of Aidan Nelson (CRCL/P/7/A) - Paragraphs 90 to 101. • Proof of Evidence of Paul Tregear (CRCL/P/8/A) - Sections 6 and 7. • Note responding to Inspector's questions on the Highway's Agency's response to the further highway traffic assessment (CRCL/P/8/F). • Note responding to Inspector's questions on the validation of Oxfordshire County Council's COTM Model (CRCL/P/8/G). <p>STATEMENT MATTER - 6(c)</p> <p>Core documents:-</p> <ul style="list-style-type: none"> • Network Rail, All Level Crossing Risk Model (ALCRM) User Guide (CD/3.36). <p>Witness documents:-</p> <ul style="list-style-type: none"> • Proof of Evidence of Aidan Nelson (CRCL/P/7/A) - Paragraphs 90 to 152. • Appendices to Proof of Evidence of Aidan Nelson (CRCL/P/7/B)

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	<p>ACEN/1 - Paragraphs 5 to 41.</p> <ul style="list-style-type: none"> • Note in response to questions of clarification raised on Day 2 and matters raised by the Inspector on Day 3 (CRCL/P/7/E). • Rebuttal by Aidan Nelson in response to rebuttal of Mr Salisbury (OBJ5/9) (CRCL/P/7/F). • Note on safety management information system data (CRCL/P/7/G). • Proof of Evidence of Paul Tregear (CRCL/P/8/A) - Section 8. • Proof of Evidence of Richard Caten (CRCL/P/11/A) -Section 10, paragraphs 10.2.1 and 10.2.2. • Proof of Evidence of Ian Gilder (CRCL/P/12/A) - Section 11. • Aristotle Lane mitigation works - progress of negotiations with Oxford City Council (CRCL/P/12/E). <p>CRCL general Inquiry documents:-</p> <ul style="list-style-type: none"> • Modifications to Order for removal of land or rights in land within Port Meadow (CRCL/INQ/16 and CRCL/INQ/16/1). • Note to the Inspector on Trap Ground Allotments Association car parking (CRCL/INQ/29). • Update note on rights sought over Port Meadow (CRCL/INQ/50). • Note on access routes prior and post scheme – Holts Farm, Manor Farm, Beebont and Home Farm (CRCL/INQ/70).

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<p>(7) The likely impacts of the scheme on flora and fauna, including whether implementation of the scheme is likely to damage or destroy a breeding site or resting place of any species protected under the Conservation of Habitats and Species Regulations 2010 ("the 2010 Regulations"); and, if so, whether appropriate mitigation measures have been designed and licences applied for by Chiltern Railways under the 2010 Regulations.</p>	<p>STATEMENT MATTER 7</p> <p>Witness documents:-</p> <ul style="list-style-type: none"> • Proof of Evidence of Andy Coates (CRCL/P/10/A) - Section 2 and 3. • Note on update in relation to Natural England (OBJ/246/3) (CRCL/P/10/E). <p>CRCL general Inquiry documents</p> <ul style="list-style-type: none"> • Note on the conservation of Habitats and Species Regulations 2010, as applied to the Order application (CRCL/INQ/60). • Note on Chiltern Railways' position statement on Natural England's objection in relation to bats at Wolvercote Tunnel (CRCL/INQ/61). • Note on CRCL's position statement on Natural England's objection to bats in their natural range (CRCL/INQ/73). • Note on lighting report on Wolvercot Tunnel (CRCL/INQ/81).
<p>(8) In relation to the Oxford Meadows Special Area of Conservation (a "European site" under the 2010 Regulations):</p> <p>a) whether the scheme (either alone or in combination with other plans or projects) is likely to have an adverse effect on the integrity of the site, having regard to the conservation objectives of the site and to the manner in which the scheme is proposed to be carried out by Chiltern Railways, including any proposed conditions or restrictions to which the draft TWA</p>	<p>STATEMENT MATTER 8</p> <p>Witness documents:-</p> <ul style="list-style-type: none"> • Proof of Evidence of Andy Coates (CRCL/P/10/A) - Section 2, paragraphs 2.11 to 2.39 and paragraph 2.92. • Note on update in relation to Natural England (OBJ/246/3) (CRCL/P/10/E).

Secretary of State's Statement of Matters matter	CRCL's response in the Proofs of Evidence
<p>Order and deemed planning permission would be subject; and, if so,</p> <p>b) whether there are any alternatives to Chiltern Railways' proposals which are capable of achieving the objectives of the scheme, which are feasible and which would have less adverse impact on the integrity of the site or no such impact;</p> <p>c) whether the scheme is necessary for imperative reasons of overriding public interest; and</p> <p>d) whether compensatory measures can be secured which would ensure the overall coherence of the Natural 2000 Network.</p>	<ul style="list-style-type: none"> Note on information from air pollution information system (APIS) website (CRCL/P/10/F). <p>CRCL general Inquiry documents</p> <ul style="list-style-type: none"> Note on the conservation of Habitats and Species Regulations 2010, as applied to the Order application (CRCL/INQ/60). Note on summary of information provided for Habitats Regulations Assessment in relation to the Oxford Meadows SAC (CRCL/INQ/72).
<p>(9) Whether the scheme would be inappropriate development in the Green Belt in terms of PPG2: Green Belts and, if so, whether the harm by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations, so as to amount to the very special circumstances necessary to justify the development; whether the proposed park and ride site at Water Eaton would meet the tests in paragraph 3.17 of PPG2.</p>	<p><u>STATEMENT MATTER 9</u></p> <p>Witness documents:-</p> <ul style="list-style-type: none"> Proof of Evidence of Ian Gilder (CRCL/P/12/A) - Section 5. <p>CRCL general Inquiry documents</p> <ul style="list-style-type: none"> Revised Water Eaton Parkway Station - Illustrative general layout (Phase 1 & Phase 2) (CRCL/INQ/54).
<p>(10) The measures proposed by Chiltern Railways for mitigating any adverse impacts of the scheme, including:</p> <p>(a) the proposed Code of Construction Practice;</p> <p>(b) Chiltern Railways' Design and Access Statement;</p> <p>(c) the proposed diversions for rights of way stopped up under the draft TWA Order, including whether they would satisfy</p>	<p><u>STATEMENT MATTER 10 (a)</u></p> <p>Witness documents:-</p> <ul style="list-style-type: none"> Proof Evidence of Ian Gilder (CRCL/P/12/A) - Section 4. <p><u>STATEMENT MATTER 10 (b)</u></p> <p>Witness documents:-</p>

Secretary of State's Statement of Matters matter	CRCL's response in the Proofs of Evidence
<p>the requirements of section 5(6) of the TWA;</p> <p>(d) any measures to avoid, reduce or remedy any major or significant adverse environmental impacts of the scheme; and</p> <p>(e) whether, and if so, to what extent, any adverse environmental impacts would still remain after the proposed mitigation.</p>	<ul style="list-style-type: none"> • Proof Evidence of Ian Gilder (CRCL/P/12/A) - Section 4. <p>CRCL general Inquiry documents:-</p> <ul style="list-style-type: none"> • Revised Design and Access Statement (CRCL/INQ/68). <p>Core Documents:-</p> <ul style="list-style-type: none"> • Design and Access Statement (CD/1.19) and Revised Design and Access Statement (January 2011) (CD/1.19/1). <p><u>STATEMENT MATTER 10 (c)</u></p> <p>Core Documents:-</p> <p>Public Rights of Way Report (CD/1.11) Public Rights of Way Plans (CD/1.21) and Revised Public Rights of Way Plans (CD/1.21/1).</p> <p>Witness documents:-</p> <ul style="list-style-type: none"> • Proof Evidence of Ian Gilder (CRCL/P/12/A) - Section 11. <p>CRCL general Inquiry documents:-</p> <ul style="list-style-type: none"> • Note on the options for footpath diversions at Gosford and Water Eaton No.4 (CRCL/INQ/26). <p><u>STATEMENT MATTER 10 (d)</u></p> <p>Core Documents:-</p> <ul style="list-style-type: none"> • Noise and Vibration Mitigation Policy (CD/1.29) and the revised Noise and Vibration Policy (January 2011) (CD/1.29/1) and

<p>Secretary of State's Statement of Matters matter</p>	<p>CRCL's response in the Proofs of Evidence</p> <p>CD/1.29/2).</p> <p>Witness documents:-</p> <ul style="list-style-type: none"> • Proof of Evidence of Michael Fraser (CRCL/P/9/A) - Sections 3 and 5. • Proof of Evidence of Andy Coates (CRCL/P/10/A) - Section 2 and 3. • Proof of Evidence of Ian Gilder (CRCL/P/12/A) - Section 4, 7, 8, 9 and 10. <p>General Inquiry documents:-</p> <ul style="list-style-type: none"> • Note on train service timetable planning (CRCL/INQ/28). • Note on implementation of the noise and vibration mitigation planning condition and policy (CRCL/INQ/31) • Note on refined noise modelling and monitoring (CRCL/INQ/32). • Note on the offer of vibration monitoring in response to the request from Engage Oxford (CRCL/INQ/45). • Note on example locations of existing riding stables close to high speed railways (CRCL/INQ/53). • Note regarding the design and maintenance of noise barriers (CRCL/INQ/58). • Note on the conservation of Habitats and Species Regulations 2010, as applied to the Order application (CRCL/INQ/60).
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Secretary of State's Statement of Matters matter	CRCL's response in the Proofs of Evidence
	<ul style="list-style-type: none"> • Note on Chiltern Railways' position statement on Natural England's objection in relation to bats at Wolvercote Tunnel (CRCL/INQ/61). • Note on summary of information provided for Habitats Regulations Assessment in relation to the Oxford Meadows SAC (CRCL/INQ/72). • Note on CRCL's position statement on Natural England's objection to bats in their natural range (CRCL/INQ/73). • Note on CRCL's position statement on Natural England's objection in relation to the effects of air emissions on sites of special scientific interest (CRCL/INQ/74). • Note on CRCL's submission in response to Natural England's statement OBJ/236 (CRCL/INQ/75). • Note on lighting report on Wolvercot Tunnel (CRCL/INQ/81). <p><u>STATEMENT MATTER 10 (e)</u></p> <p>Core Documents:-</p> <ul style="list-style-type: none"> • Noise and Vibration Mitigation Policy (CD/1.29) and the revised Noise and Vibration Policy (January 2011) (CD/1.29/1 and CD/1.29/2). <p>Witness documents:-</p> <ul style="list-style-type: none"> • Proof of Evidence of Michael Fraser (CRCL/P/9/A) - Sections 3 and 5. • Proof of Evidence of Andy Coates (CRCL/P/10/A) - Section 2

Secretary of State's Statement of Matters matter	CRCL's response in the Proofs of Evidence
	<p>and 3.</p> <p>General Inquiry documents:-</p> <ul style="list-style-type: none"> • Note on train service timetable planning (CRCL/INQ/28). • Note on implementation of the noise and vibration mitigation planning condition and policy (CRCL/INQ/31) • Note on refined noise modelling and monitoring (CRCL/INQ/32). • Note on the offer of vibration monitoring in response to the request from Engage Oxford (CRCL/INQ/45). • Note on Chiltern Railways response to Natural England's outstanding objections set out in OBJ246/5 (CRCL/INQ/48). • Note regarding the design and maintenance of noise barriers (CRCL/INQ/58). • Note on the conservation of Habitats and Species Regulations 2010, as applied to the Order application (CRCL/INQ/60). • Note on Chiltern Railways' position statement on Natural England's objection in relation to bats at Wolvercote Tunnel (CRCL/INQ/61). • Note on summary of information provided for Habitats Regulations Assessment in relation to the Oxford Meadows SAC (CRCL/INQ/72). • Note on CRCL's position statement on Natural England's objection to bats in their natural range (CRCL/INQ/73).

Secretary of State's Statement of Matters matter	CRCL's response in the Proofs of Evidence
	<ul style="list-style-type: none"> Note on CRCL's position statement on Natural England's objection in relation to the effects of air emissions on sites of special scientific interest (CRCL/INQ/74). Note on CRCL's submission in response to Natural England's statement OBJ/246/6 (CRCL/INQ/75). Note on lighting report on Wolvercot Tunnel (CRCL/INQ/81).
<p>I</p>	<p><u>STATEMENT MATTER 11</u></p> <p>Witness documents:-</p> <ul style="list-style-type: none"> Proof of Evidence of Ian Gilder (CRCL/P/12/A) - Section 3.
<p>(12) The conditions proposed to be attached to deemed planning permission for the scheme, if given, and in particular whether those conditions meet the tests of DOE Circular 11/95 of being necessary, relevant, enforceable, precise and reasonable.</p>	<p><u>STATEMENT MATTER 12</u></p> <p>Core Documents:-</p> <ul style="list-style-type: none"> Request for deemed planning permission, conditions and reserved matters (CD/1.12, CD/1.12.1, CD/1.12.2, CD/1.12.3 and CD/1.12.4). <p>Witness documents:-</p> <ul style="list-style-type: none"> Proof of Evidence of Ian Gilder (CRCL/P/12/A) - Section 14. Note on amended request for Direction and revised draft Planning Conditions (CRCL/P/12/G). <p>General Inquiry documents:-</p> <ul style="list-style-type: none"> Amended request for planning direction and further revisions to proposed planning conditions (CRCL/INQ/67,

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<p>(13) Chiltern Railways' proposals for funding the scheme.</p>	<p>CRCL/INQ/67/1, CRCL/INQ/67/2, CRCL/INQ/67/3 and CRCL/INQ/67/4).</p> <ul style="list-style-type: none"> • Response to X/15 regarding a candidate planning condition for noise and vibration (CRCL/INQ/78).
<p>(14) Whether there is a compelling case in the public interest for conferring on Chiltern Railways powers compulsorily to acquire and use land for the purposes of the scheme, having regard to the guidance on the making of compulsory purchase orders in ODPM Circular 06/2004, paragraphs 16 to 23; and whether the land and rights in land for which compulsory acquisition powers are sought are required by Chiltern Railways in order to secure satisfactory implementation of the scheme.</p>	<p>STATEMENT MATTER 13</p> <p>Witness documents:-</p> <ul style="list-style-type: none"> • Proof of Evidence of Graham Cross (CRCL/P/1/A) - Sections 5, 6, 7, 8 and 9. • Proof of Evidence of Patrick O'Sullivan (CRCL/P/4/A) - Sections 10 and 12.
	<p>STATEMENT MATTER 14</p> <p>Witness documents:-</p> <ul style="list-style-type: none"> • Proof of Evidence of Richard Caten (CRCL/9/11/A) - Section 10, paragraph 10.2.3. <p>General Inquiry documents:-</p> <ul style="list-style-type: none"> • Note on the case for the grant of compulsory purchase powers in the Order scheme (CRCL/INQ/30). • Note regarding Chesterfield Properties PLC v Secretary of State for the Environment and Harris v First Secretary of State and others (CRCL/INQ/42). • Note response to X/11 regarding land parcels required for phase 2B of the Scheme (CRCL/INQ/65).

Secretary of State's Statement of Matters matter	CRCL's response in the Proofs of Evidence
<p>(15) The purpose and effect of any substantive changes proposed by Chiltern Railways to the draft TWA Order and whether anyone whose interests are likely to be affected by such changes has been notified.</p>	<p><u>STATEMENT MATTER 15</u></p> <p>Core Documents:-</p> <ul style="list-style-type: none"> • Modification to draft Order submission (Langford Lane) (CD/1.28). <p>Witness documents:-</p> <ul style="list-style-type: none"> • Proof of Evidence of Ian Gilder (CRCL/P/12/A) - Section 1. <p>General Inquiry documents:-</p> <ul style="list-style-type: none"> • Paper of amendments to the draft Order as shown on CRCL/INQ/6 (CRCL/INQ/5); • Revised paper of amendments too the draft Order as shown on CRCL/INQ/6/1 (CRCL/INQ/5/1). • Modifications to Order for removal of land or rights in land within Port Meadow (CRCL/INQ/16 and CRCL/INQ/16/1). • Response to X/13 Inspector's further questions of clarification of Chiltern Railways (CRCL/INQ/79).

Please note that the following errata sheets to CRCL's witnesses proofs of evidence have been submitted to the Inquiry:-

- **CRCL/P/1/D;**
- **CRCL/P/2/D and CRCL/P/2/D/1;**
- **CRCL/P/5/D;**
- **CRCL/P/6/D;**

- CRCL/P/7/D;
- CRCL/P/8/D;
- CRCL/P/9/D;
- CRCL/P/10/D;
- CRCL/P/11/D and CRCL/P/11/D/1; and
- CRCL/P/12/D.

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