



**TRANSPORT AND WORKS ACT 1992**

**PROPOSED  
CHILTERN RAILWAYS (BICESTER TO OXFORD  
IMPROVEMENTS) ORDER**

**STATEMENT OF CASE ON BEHALF OF  
MARK RICHARDSON & DAVID RICHARDSON  
T/A BICESTER BODYSHOP**

**REFERENCE: PETOM/119788-010009**

**PURSUANT TO RULE 7 OF THE TRANSPORT AND WORKS  
(INQUIRIES PROCEDURE)  
RULES 2004**

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## 1. BACKGROUND AND INTRODUCTION

- 1.1 This statement is made by GVA Grimley on behalf of Mark Richardson, David Richardson and Bicester Bodyshop (“the Objectors”) in accordance with Rule 7 of the Transport and Works (Inquiries Procedure) Rules 2004 and in support of the Objectors’ earlier letter of objection, to the proposed Chiltern Railways (Bicester to Oxford Improvements) Order (“the Order”), dated 15 February 2010.
- 1.2 In accordance with Rule 7 this statement of case has been prepared for submission to the Secretary of State and a copy has also been forwarded to Chiltern Railway Company Limited, c/o Eversheds LLP, One Wood Street, London EC2V 7WS.

## 2. THE OBJECTORS’ INTEREST

- 2.1 The Objectors’ address is Bicester Bodyshop, London Road, Bicester, OX26 6BY.
- 2.2 The Objectors are the freehold owners of the land and warehouses known as Bicester Bodyshop, London Road, Bicester, OX26 6BY.
- 2.3 Part of the Objectors’ property is included in the Order as Plot 04007 - 547.35 sq m hard standing London Road, Bicester, Oxfordshire.
- 2.4 The applicant, Chiltern Railways (“the Applicant”) is looking to acquire plot number 04012 on a permanent basis from the Objector.

## 3. STATEMENT OF CASE

- 3.1 The Objectors’ statement of case in relation to the above Order is as follows.
- 3.2 The Applicant has not demonstrated that the scheme underlying acquisition is necessary and that there is sufficient need for the scheme to justify compulsory purchase. The Objectors contend that the scheme is not necessary.
- 3.3 The Applicant has not demonstrated that scheme should be built in this location. The Objector contends that there are other parcels of land in this locality which could be acquired to meet the requirements of the scheme
- 3.4 If the scheme is to be built in this location it needs to be redesigned to minimise its detrimental impact on the locality and avoid the acquisition of the Objectors’ property. The Objectors’ property is needed for alteration works to the London Road and Station Approach junction. The Objectors wish to take issue with the design of the junction, which could be redesigned to avoid the acquisition of the Objectors’ property. The proposed layout of the junction can be seen at Appendix 1. The Objectors wish to argue that the land to the north of the proposed junction (the land which houses an electricity sub station) could be used for the junction

- alteration, therefore avoiding the need for the Objectors' land, or reducing the amount of the Objectors' land needed.
- 3.5 The Applicant has not demonstrated that the scheme is deliverable and viable and that funding is available.
- 3.6 The Applicant has not attempted to acquire the property by agreement and therefore cannot demonstrate that compulsory purchase is justified.
- 3.7 If the property is to be acquired, the Objectors need significantly more than the statutory minimum notice period to either reconfigure the property to cater for the loss of land, or if this is not possible to find suitable alternative accommodation and relocate the business.. There is concern that the Objectors may not be able to continue carrying out their business operations due to the loss of the hard standing. The objectors need to remain in the locality, ideally on this site, to maintain their business. The objectors estimate that they will need a minimum of 12 months notice to achieve either a successful reconfiguration of the building or a relocation. If they are not provided with sufficient notice there is a real risk that this successful local business will be extinguished and jobs will be lost.
- 3.8 There are also access related concerns which the Objectors will cover, these are as follows:
- 3.9 The temporary closure of Station Approach will cause severe disruption and is unacceptable.
- 3.10 There is likely to be severe access disruption from construction traffic during works.
- 3.11 It is unclear whether the realigned Station Approach, McKay Estate Road and the revised Station Approach/London Road junction will operate effectively.
- 3.12 To date there has been little consultation and no proposals put forward by the Applicant to address the Objectors' concerns. Accordingly, the Order should not be confirmed until these issues have been resolved fully to the satisfaction of the Objectors.
- 3.13 We therefore request that the Secretary of State either refuses to confirm the Order, or amends the Order.

## 4. DOCUMENTS

- 4.1 We would respectfully ask that we are allowed to reserve the right to introduce documents which we may put forward in evidence at a later date, on the basis that we will provide adequate prior notification of this.

Signed:



Date: 6 August 2010

Please direct all correspondence regarding this matter to:  
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APPENDIX I  
Plans – Proposed Junction Layout



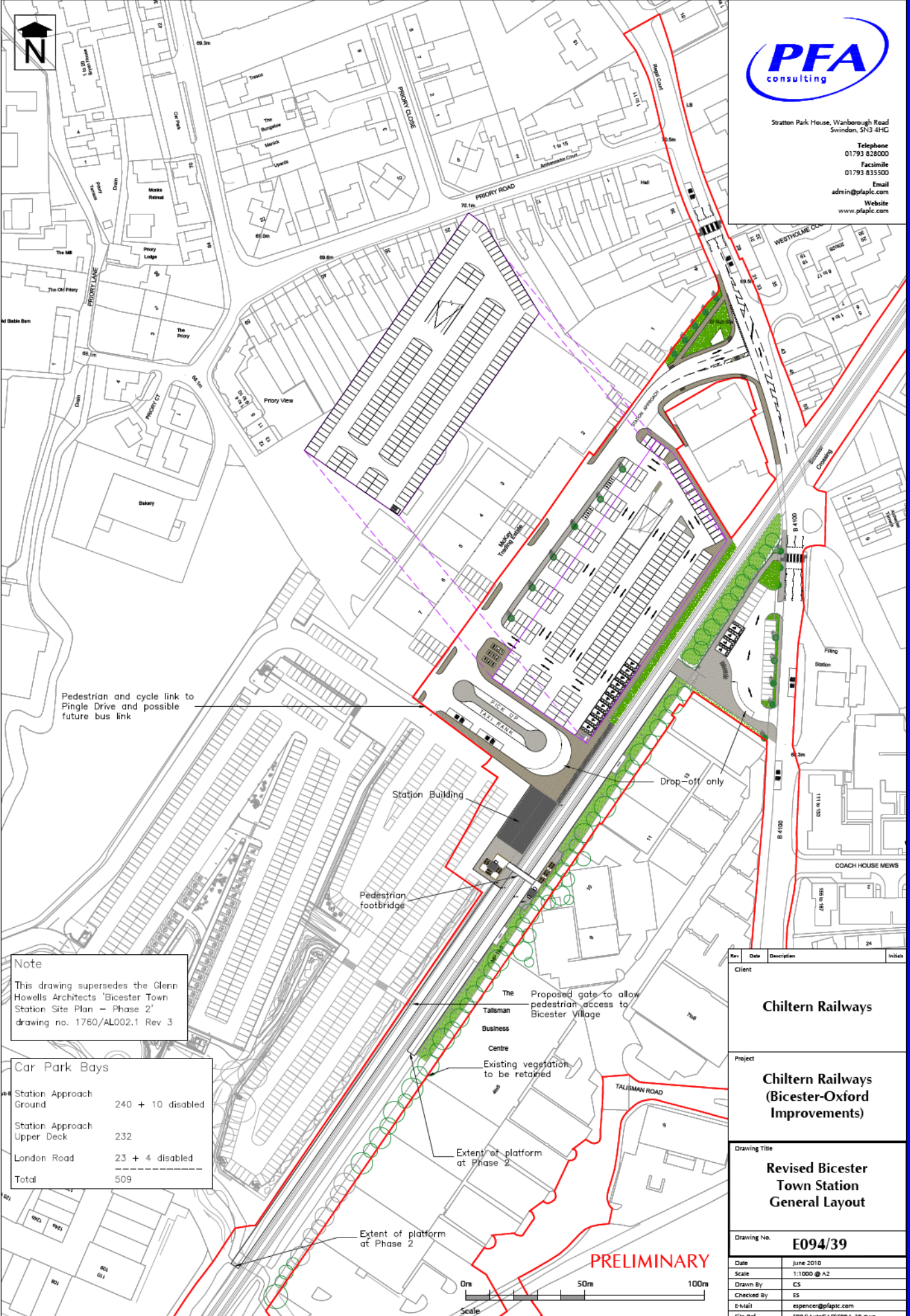
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Pedestrian and cycle link to Pingle Drive and possible future bus link

Station Building

Drop-off only

Pedestrian footbridge

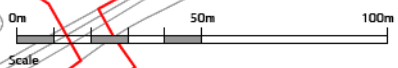
The Proposed gate to allow pedestrian access to Bicester Village

Existing vegetation to be retained

Extent of platform at Phase 2

Extent of platform at Phase 2

**PRELIMINARY**



**Note**  
This drawing supersedes the Glenn Howells Architects 'Bicester Town Station Site Plan - Phase 2' drawing no. 1760/AL002.1 Rev 3

Car Park Bays	
Station Approach Ground	240 + 10 disabled
Station Approach Upper Deck	232
London Road	23 + 4 disabled
<b>Total</b>	<b>509</b>

Rev	Date	Description	Initials

Client	<b>Chiltern Railways</b>
Project	<b>Chiltern Railways (Bicester-Oxford Improvements)</b>
Drawing Title	<b>Revised Bicester Town Station General Layout</b>
Drawing No.	<b>E094/39</b>
Date	June 2010
Scale	1:1000 @ A2
Drawn By	CS
Checked By	ES
E-Mail	espen@pfapl.com
File Ref.	ED94/AutoCAD/ED94_39.dwg

Extract from PFA Consulting Drawing No. E094/39 showing proposed changes to the Station Approach and London Road junction.

