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Your Reference:  
Please Quote: GSE.39369  
Date: 2 August 2010



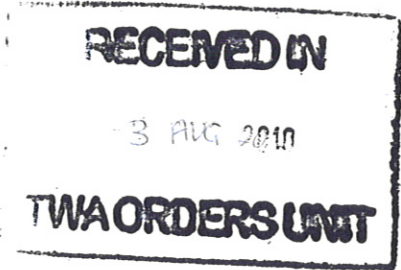
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The Secretary of State for Transport  
Department for Transport  
c/o TWA Orders Unit  
Zone 1/31  
76 Marsham Street  
London SW1P 4DR



**Special Delivery**

Dear Sir

**THE CHILTERN RAILWAYS (BICESTER TO OXFORD IMPROVEMENTS) ORDER  
Transport and Works Act 1992  
Mr B Henman, J E Henman & Son, Pegtop Farm, Woodeaton, Oxford OX3 9RT  
Statement of Case**

This is a statement of case for and on behalf of Mr B Henman, J E Henman & Son, Pegtop Farm, Woodeaton, Oxford OX3 9RT. My client sent you a letter of objection to the scheme dated 16 February 2010 and this statement of case should be read in conjunction with that letter of 16 February.

Background

My client objects to the proposed closure of the Islip Level Crossing. He occupies and farms land as J E Henman & Son on both sides of the railway at Mill Farm utilising Islip Level Crossing with agricultural machinery to access the land he farms. My client also utilises Mill Farm Crossing with agricultural machinery and also objects to the closure of this access.

Reasons for objection to the Order

1. No provision has been made in order to facilitate a replacement vehicular access for farm traffic across the railway at Islip Level Crossing and Mill Farm Crossing.
2. The original survey of the usage of Islip Crossing was undertaken on a single Sunday and the average weekly usage of the crossing is not adequately reflected in the survey. The dataset used to justify the closure of the crossing to vehicles by the acquiring authority is therefore inaccurate. We understand that a subsequent survey has also been undertaken although the data for this has as yet to be published.
3. There is an active badger sett situated at the position of the proposed Islip Crossing bridge. As a result of this the position of the bridge should be re-located to the south.

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:2:  
The Secretary of State for Transport  
2 August 2010

Facts upon which Mr Henman wishes to rely

1. My client, with agricultural vehicles and machinery has safely used the crossings at Islip and Mill Farm since 1962 without incident. It is essential that vehicular access for farm traffic across the railway is maintained at this point for the future otherwise my client's business will be unduly prejudiced.
2. Provide a true reflection of the usage of Islip Level Crossing.

By reason of the facts Mr Henman proposes that a vehicular crossing point for farm traffic should be maintained at Islip and Mill Farm Crossings.

Evidence upon which Mr Henman wishes to rely

There is a crossing at Yarnton Lane between Kidlington and Yarnton which is used by my client on a regular basis. This is a high speed line, operating with barriers and deemed appropriate for farm traffic use.

Alternatively, the proposed bridge to accommodate pedestrians, bicycles and horses at Islip Crossing should be upgraded to accommodate vehicular farm traffic. The bridge should also restrict access to users.

List of witnesses Mr Henman intends to call

As detailed in the Inquiry Questionnaire, my client would wish to appear personally at the Inquiry and reserves the right to call other witnesses as deemed necessary, details of which are to be advised further in due course.

Yours faithfully

A handwritten signature in black ink, appearing to read "Guto Edwards".

**Guto Edwards MRICS FAAV**  
For and on behalf of Robinson & Hall LLP

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