

*STATEMENT OF CASE OF*  
**The Friends of the Trap Grounds**  
**Hon Secretary: Catherine Robinson**  
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*in relation to the*  
*The Chiltern Railways (Bicester to Oxford Improvements) Order*  
*Public Inquiry*

12 December 2010

The Trap Grounds Town Green (grid ref. SP 503081) in north Oxford comprises an area of woodland and wetland immediately to the east of the railway tracks, and immediately to the north of the Primary School of SS Philip and James. (Despite its name, the Town Green has no connection with the Trap Grounds Allotment Association, which has made its own separate submission to the public inquiry.)

The Friends of the Trap Grounds, a voluntary group, manage the Town Green in partnership with the owner, Oxford City Council. Members of the local community use the land for informal recreation such as bird-watching and dog-walking. The only official access to the Town Green is a track known as Frog Lane, leading from the canal towpath in the north-east corner of the site. There is also, however, an informal path which leaves the Town Green at the south-west corner, running behind the school playground, between the acoustic boundary fence and the railway fence, and ending in the triangle of rough land immediately to the north of the Aristotle Lane railway bridge.

This path has been in use by local people since 2002/2003, when the construction of the school obliterated another (long-established) informal path between the Trap Grounds and Aristotle Lane. Because it constitutes the only alternative exit from the Town Green, and because we believe that on safety grounds there should be two access/exit points, we are anxious to preserve this path.

On a diagram in Appendix C ('Illustrative Mitigation Design Plans') of CRCL/INQ/13, we note that it is proposed to construct a car park for the use of allotment holders on the triangle of land (Plot No. 29003) next to the railway bridge. We respectfully request that the design of the car park should not block the informal path behind the school fence; and that if entrance to the car park is to be controlled by a lockable gate or rising barrier, a small space should be left at one side of it for the unimpeded use of pedestrians.

We hope that our request will be given sympathetic consideration, despite the belated nature of this submission.

*Catherine Robinson*  
*Hon. Secretary, The Friends of the Trap Grounds*  
*[www.trap-grounds.org.uk](http://www.trap-grounds.org.uk)*

*12 December 2010*