

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

**CHILTERN RAILWAYS' REBUTTAL PROOF OF EVIDENCE**

**IN RELATION TO**

**THE OBJECTION AND EVIDENCE OF**

**CATHERINE AND BARTHOLOMEW QUINN**

**1 Introduction**

- 1.1 This rebuttal proof of evidence has been prepared on behalf of the Chiltern Railway Company Limited (Chiltern Railways) to respond to particular aspects of the objection and evidence of Catherine and Bartholomew Quinn.
- 1.2 Catherine Quinn and Bartholomew Quinn have raised additional points since their original letter of objection dated 16 February 2010. Chiltern Railways has previously addressed the points in the objection letter in its response to that letter.
- 1.3 It is not intended that this rebuttal proof should repeat material that the witnesses for Chiltern Railways have already covered in their evidence. Cross-references to relevant paragraphs of those witnesses' proofs of evidence are given below, where appropriate.
- 1.4 It is intended that this rebuttal proof should be a composite response by Chiltern Railways to those new points raised in the evidence of Catherine and Bartholomew Quinn and referred to above. In this respect, for cross-examination purposes, the name of the Chiltern Railways witness who is responsible for each aspect of this rebuttal proof is given at the beginning of each section below.

**2 Defined Terms**

- 2.1 The following defined terms are referred to throughout this rebuttal proof:

*“the Correspondence”* means correspondence in the form of letters exchanged between Chiltern Railways and Catherine Quinn dated 16 February 2010, 18 June 2010, 8 July 2010, 29 June 2010, and 27 June 2010, attached to this rebuttal proof in Appendix A;

<i>“the Objectors”</i>	means Catherine and Bartholomew Quinn;
<i>“the Objector’s evidence”</i>	means the Statement of Case of Catherine and Bartholomew Quinn;
<i>“the Order application”</i>	means the application for the proposed Order submitted on 6 January 2010 and the Proposed Modification dated 9 September 2010; and
<i>“the proposed Order”</i>	means the proposed Chiltern Railways (Bicester to Oxford Improvements) Order.

### **3 Chiltern Railways’ Rebuttal of the Objectors’ Evidence**

#### *Context*

- 3.1 The Objectors live at Merton Grounds Farm Cottage, Merton Grounds, Wendlebury, Oxfordshire. The objection relates to both the original TWA Order alignment of Langford Lane and the alignment in the Proposed Modification. The Objectors support an alternative route to the east of the railway referred to as the ‘Orange Route’. The Objectors state that they made it clear in their original objection letter their willingness to withdraw their objection if Chiltern Railways adopted the Orange Route to the east of the railway.

#### *Landowner Consultation, Richard Caten*

- 3.2 The Objectors state that Chiltern Railways stated its intention to contact and consult local property owners whose rights are likely to be affected or whose access will be compromised by the Order. The Objectors state that Chiltern Railways’ agents failed to notify the owner and residents of Merton Grounds Farm Cottage of the Order application. The Objector states that they were informed by neighbours at Merton Grounds Farm in January 2010.
- 3.3 The Objectors state that the Chiltern Railways has failed to acknowledge the concerns of the owners and residents of Merton Grounds Farm and Merton Grounds Farm Cottage and that they had not been directly informed or consulted about the Order application. The Objectors state that Chiltern Railways primary concern is to *“remove as many objections before the Public Inquiry commences as is possible.”*
- 3.4 The Objectors state that they remain frustrated that their points have neither been addressed nor acknowledged appropriately by Chiltern Railways.
- 3.5 As set out in the Statement of Consultation [CD/1.5], extensive local consultation has been carried out, in accordance with The Transport and Works (Applications and Objections Procedure) (England and Wales) Rules 2006 [CD/5.22]. Public consultation exercises have taken place including exhibitions, newsletters and targeted info-mails, a website. A hotline has been publicised so that residents and other interested parties can make contact with consultation team, and enquiries have been followed up with written and verbal correspondence. The Objectors and their

neighbours were certainly in the area where newsletters were delivered to. One of the early exhibitions was held in Bicester itself. The Order Scheme has also appeared in the media locally.

- 3.6 The land that the Objectors have a private access right over, that has been included within the draft Order, extends only to include parcel 07a005. This parcel contains land that forms part of a private road owned by Topbreed Limited. This parcel has been included in the Order to allow for highway tie-in and continuity works from Topbreed's private road to Langford Lane and the proposed Langford Lane alternative, both of which will be adopted public highways.
- 3.7 Chiltern Railways can confirm that it has been and remains its objective to satisfy and remove as many objections as possible.

*Disruption to Access, Ian Gilder*

- 3.8 The Objectors state that realignment of Langford Lane would cause significant inconvenience for local residents of Merton Grounds. They object to the closure of the Langford Lane level crossing which provides sole vehicular access from Merton Grounds Farm Cottage to the public highway.
- 3.9 The Objectors calculate that the Order Scheme alignment of Langford Lane will add an extra 1.5 kilometres in each direction for residents of Merton Grounds Farm Cottage and Merton Grounds Farm. The Objectors calculate that for one return journey on week days and two return journeys on a weekend day which amounts to an increase of 27 kilometres per week and 1,404 kilometres per year. The Objectors state that the attendant costs of this increase are significant.
- 3.10 The Objectors state that the response they received from Chiltern Railways to their original objection that their daily commute would be easier was incorrect.
- 3.11 Figures **OBJ230/1/A** and **OBJ230/1/B** in Appendix B show indicative journeys from Merton Grounds Farm in both the Bicester and Oxford Direction in the existing situation and with the original TWA Order Alignment of Langford Lane. The distances are summarised in *Table 1*.

*Table 1: Changes in Journey Length by Road from Merton Grounds*

Journey	Distance (Kilometres)	
	Point A to B Eastwards to Bicester	Point A to C Westwards to Oxford
Existing Alignment of Langford Lane	3.98	4.29
Original TWA Alignment of Langford Lane	5.84	5.37
<b>Net Difference</b>	<b>+1.86</b>	<b>+1.08</b>

- 3.12 The distances presented in *Table 1* show that the Order Scheme would result in an additional journey distance of 1.86 kilometres [1.15 miles], which is in fact greater than that suggested by the Objectors. Taking the assumptions the Objectors make regarding number of trips this would equate to 33.5 kilometres [20.82 miles] per week

and 1,742 kilometres [1,082 miles] per year. Taking a likely average speed of 30 mph for a rural country road, the extra distance would only add just over two minutes to each journey.

- 3.13 The Objectors have not provided a cost to them for the additional distance travelled and it is, therefore, not possible to confirm their statement or otherwise that this would be a significant cost to them.

*Junction Design and Safety, Paul Tregear*

- 3.14 The Objectors state that incoming and outgoing traffic from their property will need to take a sharp hairpin bend at Wendlebury Gate Stables. The Objectors are concerned with the safety of this proposal given the level of congestion and parked cars.

- 3.15 The new junction will be a safe and suitable form of access constructed to adoptable standards.

*Disruption to Deliveries, Paul Tregear*

- 3.16 The Objectors state that the turning space will be insufficient for very large vehicles which could prevent private deliveries to their property and local service providers such as Council services and the Royal Mail might reasonably object to the extra distance.

- 3.17 The new junction arrangement will be designed to accommodate all types of vehicle that reasonably require access to the properties.

*Access by the Emergency Services, Paul Tregear*

- 3.18 The Objector states that Chiltern Railways reported to them that emergency services would have a shorter route to the highway from their property with the Order Scheme. The Objectors state that with the revised alignment under the Proposed Modification the Emergency Services will have to drive even further from Bicester to reach an emergency at Merton Grounds. This is of natural concern to the Objectors, which they state is not satisfactorily addressed.

- 3.19 It is acknowledged that highway journeys to/from Bicester via the Proposed Modification route alignment will be longer than both the original TWA Order alignment and the existing route via Langford Lane. However, the emergency services (and other vehicles) from Bicester could reduce journey times by accessing the new Langford Lane via the Wendlebury A41 junction rather than by using the Chesterford A41 junction, which provides the shortest access via the present Langford Lane.

*Level of Consideration Given to the 'Orange Route' Alternative Proposal, Richard Caten*

- 3.20 The Objectors state that in making their objection they have had regard to page 7 of the Draft Order [CD/1.2] that it is helpful if objections 'also sets out proposals for changes or mitigation that would overcome any problems identified'. The Objectors state that in its response to their original objection letter Chiltern Railways dismissed

the proposals for the Orange Route on the basis that it was premature to review alternatives. The Objectors quote from the letter from Chiltern Railways' property agents, Ardent dated 18 June 2010.

*“The Order application plans do not shown [sic] the proposed road layout, they simply show the land required for the road and bridge” and “detailed design has not been carried out”*

- 3.21 The Objectors refute the assertion in the letter, stating that the Order clearly proposes a route which gave rise to their objection in the first place.
- 3.22 The Objectors state that Chiltern Railways has not provided any evidence that it has carried out reasonable due diligence on the alternative Orange Route, nor has it acknowledged that this has the broad support of the majority of residents and landowners affected directly by the proposed closure of Langford Lane crossing.
- 3.23 The draft Order plans show the land that has been included within the Order Scheme as an outline design. The road layout will be designed during the detailed design process, which will be carried out in 2011, with reference to the Highway Authority as the proposal is for the road to be adopted.
- 3.24 The options considered in the Langford Lane Crossing: Pre-TWA Options Report [CD/2.11] acknowledges that none of the options is without disadvantages. Chiltern Railways has considered the Orange Route and as with all options there will be some parties who feel that an alternative solution would suit them better and it is, therefore, impossible to satisfy the desires of all affected parties.

*Support for the ‘Orange Route’ Alternative Proposal, Paul Tregear and Ian Gilder*

- 3.25 The Objectors propose an alternative option referred to as the ‘Orange Route’ which is also proposed by other objectors in their evidence **OBJ/189/2**, **OBJ/190/2** and **OBJ/191/2**. The alternative route proposes the use of the existing farm road between Merton Grounds and Langford Lane linking into Chiltern Railways proposed alignment to the west of the railway. The Objectors state that the Orange Route will:
- avoid congestion and turning problems at Wendlebury Gate Stables/Bramlow;
  - enable large lorries and service vehicles to continue to deliver directly to their property;
  - significantly reduce the additional cost and time required to travel from their properties to the public highway; and
  - avoids sites of archaeological interest.
- 3.26 Paragraphs 3.14 to 3.19 of this rebuttal provide detail the impact of the Proposed Modification on the transport network. Paragraphs 3.29 to 3.35 of this rebuttal consider the inconvenience associated with the Proposed Modification. The Objector promotes an alternative Orange Route, however, Chiltern Railways cannot see any substantive benefit in the Orange Route above the Order Scheme. English Heritage has removed their objection to the Order Scheme [**OBJ128/1**] following the Proposed

Modification to the Order. Therefore, the Objector's challenge to the alignment of the Order Scheme on archaeological grounds is not supported.

*Deliverability of the Orange Route, Richard Caten*

- 3.27 The Objector states that rights over land required to deliver the Orange Route have already been satisfactorily addressed.
- 3.28 While it appears that all of the landowners who own land required for the Orange Route would be willing to make this available, Chiltern Railways does not see this as the main reason for not pursuing the Orange Route.

*Inconvenience Associated with the Proposed Modification, Ian Gilder*

- 3.29 The Objectors state their objection to the 'revised alignment' to Langford Lane under the Proposed Modification as it will increase the distance of the route diversion from Langford Lane to the public highway, making matters significantly worse for the Objectors. The Objectors quote from the Second Addendum to the Environmental Statement [CD/1.22/1], stating that that *"that the closure of the Langford Lane crossing and its replacement will entail greater travel distances for residents and others east of the crossing"* and that *"compared to the TWA Order Alignment there is an increase of 0.74 km eastwards which provides access to Bicester."* *"The Revised Alignment would not result in a significant impact to users of vehicular transport... The distances to be travelled by road users are not significantly greater"*.
- 3.30 The Objectors state that this conclusion contradicts other advice in the Addendum and is disingenuous as it would result in an extra 0.74 kilometres in addition to the 1.42 kilometres for the original TWA Order Alignment. The Objector calculates that this would lead to an additional 2.16 kilometres each way from their property. Based on a typical weekly travel pattern it would result in a 38.88 kilometres per week, or an additional 2,021 kilometres per year.
- 3.31 The Objectors state that the additional mileage is excessive and unreasonable, particularly where a practical alternative strategy (the Orange Route) has been offered by the Objectors.
- 3.32 Figures **OBJ230/1/A** and **OBJ230/1/B** show indicative journeys from Merton Grounds in both the Bicester and Oxford Direction in the existing situation, with the original TWA Order Alignment of Langford Lane and with the Revised Alignment of Langford Lane. Figures **OBJ230/2/A** and **OBJ230/2/B** show the same journeys with the 'Orange Route', being supported by the Objector. These figures are included as Appendix B to this rebuttal. The distances are summarised in *Table 2*.

*Table 2: Changes in Journey Length by Road from Merton Grounds Farm*

Journey	Distance (Kilometres)	
	Point A to B Eastwards to Bicester	Point A to C Westwards to Oxford
Existing Alignment of Langford Lane	3.98	4.29
Original TWA Alignment of Langford Lane	5.84	5.37

Revised Alignment of Langford Lane	6.48	4.94
Orange Route and Original TWA Alignment of Langford Lane	4.98	4.51
Orange Route and Revised Alignment of Langford Lane	5.63	4.09

- 3.33 The distances in Table 2 shows that the increase in distance with the Revised Alignment of Langford Lane will be 0.64 kilometres, which is close to the 0.74 kilometres quoted in the Second Addendum to the Environmental Statement [CD/1.22/1]. Therefore, the conclusion quoted from the Second Addendum to the Environmental Statement [CD/1.22/1] *“The Revised Alignment would not result in a significant impact to users of vehicular transport...The distances to be travelled by road users are not significantly greater remains valid”*.
- 3.34 The distances presented in Table 3 show that the Orange Route would result in a distance saving of 0.86 kilometres compared to the both the Original TWA alignment of Langford Lane and the Revised Alignment of Langford Lane from Merton Grounds Farm. Whilst there is some distance saving for landowners and residents in the Merton Grounds area, as shown in Table 3, the Orange Route would result in additional distances for the owners, staff and visitors to/from the Wendlebury Gate Stables. Significantly more journeys are likely to be made by these users than by the residents of Merton Grounds Farm Cottage.

*Table 3: Changes in Journey Length by Road from Wendlebury Gate Stables*

Journey	Distance (Kilometres)	
	Eastwards to Bicester	Westwards to Oxford
Existing Alignment of Langford Lane	3.98	4.29
Original TWA Alignment of Langford Lane	4.63	4.13
Revised Alignment of Langford Lane	5.24	3.70
Orange Route and Original TWA Alignment of Langford Lane	5.05	4.57
Orange Route and Revised Alignment of Langford Lane	5.67	4.12

- 3.35 The distances presented in Table 3 show that the Orange Route would result in an additional distance of around 0.42 kilometres compared to the Original TWA alignment of Langford Lane and the Revised Alignment of Langford Lane to/from the Wendlebury Gate Stables.

#### **4 Conclusion**

- 4.1 This rebuttal responds comprehensively to the evidence made by the Objector.
- 4.2 Public consultation exercises have taken place including exhibitions and newsletters in addition to the information contained on the website. A hotline has been publicised on the website and within the other consultation documents, so that residents and other interested parties can make contact with consultation team. Chiltern Railways considers that it has carried out consultation in accordance with the Transport and

Works Act (Applications and Objections Procedure) (England and Wales) Rules 2006.

- 4.3 The Order Scheme necessarily balances a number of conflicting factors including impacts on the Alchester Roman Town Scheduled Ancient Monument, access and additional length of the diversionary route over that of the existing route. The Objector promotes an alternative Orange Route, however, Chiltern Railways cannot see any substantive benefit in the Orange Route above the Order Scheme with the Proposed Modification for the reasons set out in this rebuttal.

Appendix A

CRCL/R/OBJ230

Relevant Correspondence  
between Chiltern Railways  
and the Objector



Merton Grounds Farm Cottage  
Merton Grounds  
Wendlebury  
Oxfordshire  
OX25 2NS

16 February 2010

The Secretary of State for Transport  
c/o The Transport and Works Act Orders Unit  
Unit Department for Transport  
Zone 1/31  
Great Minster House  
76 Marsham Street  
London  
SW1P 4DR

Email: [transportandworksact@dft.gsi.gov.uk](mailto:transportandworksact@dft.gsi.gov.uk)

Dear Secretary of State,

**The Chiltern Railways (Bicester to Oxford Improvements) Order 201 [X]**

I refer to the above Order, Paragraph 15 (Replacement and Closure of Road Level Crossings) which proposes to close the level crossing at Langford Lane as a part of Chiltern Railways' plan to increase the rail traffic and speed on the Bicester to Oxford line. As the owner and full-time resident of Merton Grounds Farm Cottage, I have a direct interest in this proposal, since Langford Lane provides me with the sole vehicular access from my home to the public highway, and it also does for services and visitors to my property.

**I wish to register a formal objection to Chiltern Railways' request to close Langford Lane, at least in the terms proposed by Chiltern Railways.**

**1. Grounds for objection: personal**

The current plan suggests a re-direction of the sole access by car from my property to the public roads via a new road, which will force traffic from the farm track leading out of Merton Grounds onto an overly complicated and elongated route, resulting in a significant increase to the distance that I and my neighbours have to travel each day to reach the public highway.

Compare the following with our current journey of a straight route of approximately 0.5km from Wendlebury Gate Stables/Bramlow Bungalow, over the level crossing, to the end of Langford Lane:

First, Chiltern Railways' proposed new route would force all incoming and outgoing traffic from our farm track onto a sharp hairpin bend at Wendlebury Gate Stables – an area already cramped with cars, horses, horseboxes, riders and children.

This would then be followed by a route swinging immediately Southwards, which would re-trace a great deal of the distance we had just travelled Northwards to get to the Wendlebury Stables hairpin bend: a waste of time and fuel.

There is then a subsequent swing Westwards, and a lengthy passage across the fields ending up somewhere near Wendlebury, from which we would have to drive Northwards again to get to Bicester, as I have to do on a daily basis.

The whole adventure would take me, my neighbours, service providers and visitors in a hugely circuitous route around the farm land to get to a point which is currently just at the top of the lane. The additional mileage (which I estimate at something between 0.5km and 1km per journey), would increase my weekly travel by 10 to 15km per week, and multiplied by 52 weeks per year, that amounts to a significant additional requirement.

It seems to me that Chiltern Railways' proposed re-routing of our access road provides the company with the shortest and therefore the cheapest solution for them, which paradoxically will prove to be the most expensive for the local residents whom it will affect very significantly.

## **2. Other grounds for objection**

I have already referred above to the worrying safety issues associated with Chiltern Railways' proposal to install a sharp hairpin bend at Wendlebury Gate Stables/Bramlow Bungalow. Other considerations, of which I trust you are aware, include the following:

- There will be insufficient turning space at the above hairpin bend for large vehicles (e.g. domestic fuel tankers) which make deliveries to Bramlow, Merton Grounds Farm, and Merton Grounds Farm Cottage. Companies might therefore start refusing to deliver to our properties if they are unable to access our properties without hindrance.
- Our local service providers (Cherwell District Council and Royal Mail, for example) might reasonably object to travelling the significant extra distance required by Chiltern Railways' proposed new route and refuse to deliver their services as closely to our properties as they do at present.
- The proposed route runs so closely along the line of local archaeological sites that it is likely to disturb areas of significant historical interest.

## **3. Lack of direct contact and consultation with affected residents**

In its submission, Chiltern Railways refers to the fact that property owners whose rights are likely to be affected or whose access will be compromised by their plans were all to be contacted directly. **I can confirm that Chiltern Railways made no direct contact with me:** I received no leaflet or correspondence; nor, I believe, did my neighbour at Merton Grounds Farm. The first I heard of the planned closure of my direct access route was indirectly in January 2010, when my neighbour's agent alerted me to Chiltern Railways' proposal. I am dismayed that so little effort was made by Chiltern Railways to investigate what might be significant concerns on the part of residents affected by these plans.

## **4. Alternative or mitigation proposal**

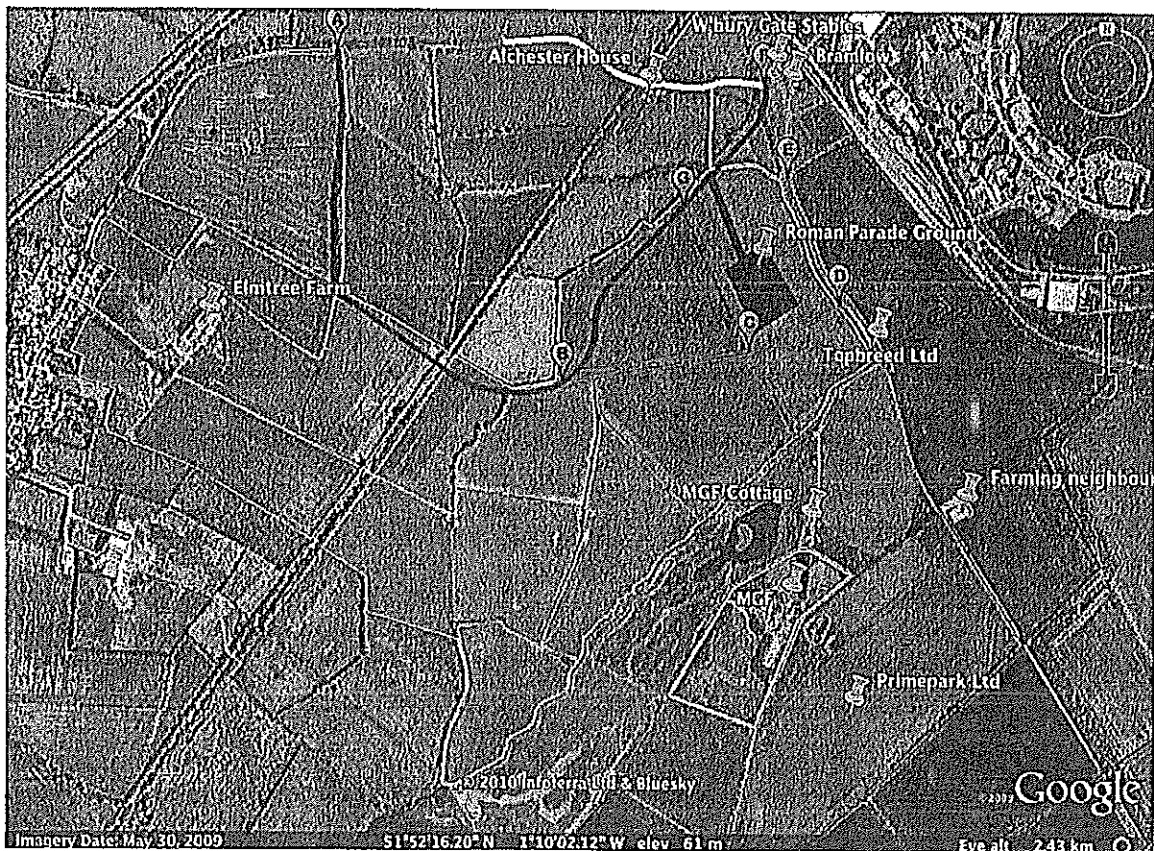
Chiltern Railways state in their Introduction to the Application for the Order (January 2010, p. 7) that

*Any affected person is entitled to make an objection or representation on any relevant aspect of the scheme. This should state the grounds of your objection or representation. It is helpful if it also sets out proposals for changes or mitigation that would overcome any problems identified.*

Whilst I strongly object to Chiltern Railways' specific proposal for the re-routing of my access road to the main highway, I am sympathetic to the public interest in the improvement of the Bicester to Oxford railway line. My neighbour has proposed an alternative option for which he is generously offering use of an existing road, and which:

- Will steer clear of the potential congestion and turning problems at Wendlebury Gate Stables/Bramlow;
- will enable large lorries and service vehicles to continue to deliver directly to our properties;
- will significantly reduce the additional cost and time required to travel from our properties to the main highway; and
- will avoid sites of archaeological interest.

My neighbour's agent, Mr Van Wijngaarden, has submitted this alternative proposal to you in a letter of today's date. For ease of reference, I have replicated below the same map which he includes in his letter, showing Chiltern Railways' unacceptable plans in red; and my neighbour's mitigation proposal in orange.



**I would be prepared to withdraw my objection to the closure of Langford Lane Crossing and the re-routing of my access road if Chiltern Railways were to adopt the orange route shown on the map above.**

Please do not hesitate to contact me if you would like further explanation of why Chiltern Railways' proposal is unacceptable in its current terms.

Yours sincerely,

Catherine Quinn

OBJ 230

Our Ref: PC/P3.2.3.135/EG3/001  
Your Ref:

Ms C Quinn  
Merton Grounds Farm Cottage  
Merton Grounds  
Wendlebury  
Oxfordshire  
OX26 2NS

Dir Tel – 07900 052307  
E-mail – paulclarke@ardent-  
management.com

18<sup>th</sup> June 2010

Dear Ms Quinn,

**Draft Chiltern Railways (Bicester to Oxford improvements) Order  
Objection number 230**

I refer to your letter dated 16<sup>th</sup> February 2010, addressed to the Secretary of State for Transport, setting out your objection to the above Order application. The following are Chiltern's responses to your points of objection.

**1. Grounds for objection: personal**

It is very unfortunate that the necessary closure of the Langford Lane level crossing will entail an increase in the distance travelled for all current users. The safety reasons for closure are set out in the Public Rights of Way Report, which was one of the Chiltern Application Documents. These can all be viewed on the project website at [www.chiltern-evergreen3.co.uk](http://www.chiltern-evergreen3.co.uk).

As I have discussed with you previously, the choice of the replacement access route was made upon consideration of a number of factors. The area is significantly constrained by the Scheduled Ancient Monument and the MoD land ownership. A shorter diversion route was not possible.

In earlier correspondence between us you mentioned that the distance that you travel to the railway station will be increased. As I pointed out to you, on completion of the scheme, you will have access to the Bicester Town station, which will be much easier for you to reach than the Bicester North station that you currently use. Consequently, post scheme your commute is likely to be shorter than it is now and certainly won't entail driving through Bicester.

Ardent Management Ltd  
P.O Box 3050 . Wokingham  
Berkshire . RG40 3YD  
t . +44 (0)1870 443 9100  
f . +44 (0)1870 443 9101  
e . info@ardent-management.com

## **2. Other grounds for objection**

The Order application plans do not show the proposed road layout, they simply show the land required for the road and bridge. Detailed design will not be carried out until the Order is made. This must be carried out in consultation with the Highway Authority, as it is intended that this route will become an adopted highway – Chiltern will have to comply with all statutory requirements for a new highway. This will resolve perceived safety and usability issues.

In relation to the other points:

- As above, detailed design has not been carried out.
- This issue has not been raised at all in our consultation with the Highway Authority or any of the Statutory Undertakers. Presumably such bodies also use the access to your property from the Merton Road, which is unaffected?
- Chiltern is working closely with English Heritage to ensure that the impacts of the new road are minimised.

## **3. Lack of direct contact and consultation with affected residents.**

As set out in the consultation report, extensive local consultation has been carried out, in accordance with The Transport and Works (Applications and Objections Procedure) (England and Wales) Rules 2006. Public consultation exercises have taken place including exhibitions, newsletters and targeted infomails, a website. A hotline has been publicised so that residents and other interested parties can make contact with the consultation team, and enquiries have been followed up with written and verbal correspondence. You and your neighbours were certainly in the area where newsletters were delivered to. One of the early exhibitions was held in Bicester itself, which was publicised with a flyer which was delivered to properties within your postcode. The Scheme has also appeared in the media locally.

## **4. Alternative or mitigation proposal**

The alternative route will slightly reduce the distance (by 0.7km) you need to travel in this direction to Bicester, but it will increase that distance for other users quite considerably. As one of the other users is a riding school, the distance to it from the public highway for ambulances was one of the considerations taken into account. As above, emergency services vehicles have another shorter route to the highway from your property.

This route also has its own problems in terms of the Scheduled Ancient Monument that needs to be skirted. As above, Chiltern is working closely with English Heritage to minimise any potential impacts.

I hope the above clarifies some of the issues you have raised. Please contact me if you would like to discuss the above or if you require any further information.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'P. Clarke', written in a cursive style.

**Paul Clarke**  
**Associate director**

cc C Baker ERM  
Enc

**Nicola Finlay**

---

**From:** Paul Clarke [PaulClarke@ardent-management.com]  
**Sent:** 08 July 2010 14:43  
**To:** 'catherine.quinn@oba.co.uk'  
**Cc:** ERM UK Chiltern Objections; chiltern objections  
**Subject:** RE: FW: Proposed diversion of road

**Follow Up Flag:** Follow up  
**Flag Status:** Red

Catherine

As it appears that you won't be disadvantaged by the scheme in your journey to work, are you able to withdraw your objection to the scheme? Our aim is to remove as many objections before the Public Inquiry commences as is possible.

If not and you still have outstanding concerns, please let me know.

Regards,

Paul

Paul Clarke | Associate Director  
 Ardent Property Consultants  
 Tel: +44 (0)870 443 9100 | Mobile: +44 (0)7900 052307 PaulClarke@ardent-management.com  
 | www.ardent-management.com |

-----Original Message-----

**From:** catherine.quinn@oba.co.uk [mailto:catherine.quinn@oba.co.uk]  
**Sent:** 29 June 2010 12:41  
**To:** Paul Clarke  
**Subject:** RE: FW: Proposed diversion of road

Dear Paul,  
 Thanks very much - especially for the information about Bicester Town and Marylebone.  
 I appreciate the feedback.

Yours,  
 Catherine

-----Original Message-----

**From:** "Paul Clarke" <PaulClarke@ardent-management.com>  
**Sent:** Tuesday, June 29, 2010 9:51am  
**To:** "'catherine.quinn@oba.co.uk'" <catherine.quinn@oba.co.uk>  
**Cc:** "Peter Gibbard" <PeterGibbard@ardent-management.com>, "Charlene Baker" <Charlene.Baker@erm.com>  
**Subject:** RE: FW: Proposed diversion of road

Catherine

1. I can confirm that London Marylebone bound trains will be stopping at Bicester Town, two trains per hour. This will be in addition to the existing services that stop at Bicester Town station. So, the additional distance you mention in 4. will not be an issue. This should be an easier drive, as you won't have to negotiate Bicester traffic.

2. we are constrained by the limits of the land as applied for. These limits cannot now be varied. The detailed design will though take on board the usability points raised by you and your neighbours.

With regards to updates, please contact me at any time and I will let you know what is happening. Updates will also be put on the Chiltern website.

Regards,

Paul

Paul Clarke | Associate Director  
Ardent Property Consultants  
Tel: +44 (0)870 443 9100 | Mobile: +44 (0)7900 052307 PaulClarke@ardent-management.com  
| www.ardent-management.com |

-----Original Message-----

From: catherine.quinn@oba.co.uk [mailto:catherine.quinn@oba.co.uk]  
Sent: 27 June 2010 19:56  
To: Paul Clarke  
Subject: RE: FW: Proposed diversion of road

Dear Paul,

Thank you for your letter of 18 June. I appreciate your taking the trouble to address the points I raised in February. Just a quick response:

1. Journey to work: I won't be using Bicester Town Station as it will not be on the route for trains to Marylebone Station, which is my destination in London. Thus, I'll still have to drive through Bicester to Bicester North station so that I can go direct to Marylebone.

2. I hope that when the detailed road layout plans are prepared, sufficient notice is taken of my and my neighbours' (Merton Grounds Farm) position, and that every effort will be made to endeavour to create the shortest possible route for us as well as for the other residents affected.

3. Neither the Farm nor my cottage received any consultation materials, as we have pointed out previously. However, you have very helpfully supplied me with all the information since I got in touch, for which I am grateful.

4. 0.7km at least twice a day (four times a day on weekends) is a lot of extra mileage for me = 12.6km extra per week = 655km extra per year. I appreciate that the riding school will want quick and direct access for emergency purposes, but I suspect that the alternative route we have proposed makes only a minimal difference to vehicles requiring access to the stable, whilst for us 0.7km makes a big difference to each journey. Is there a sensible compromise to be struck here?

I shall not be attending the inquiry as I am unable to take time off work, but I would appreciate it if you could keep me informed as to developments - if indeed it is Ardent's job to do so.

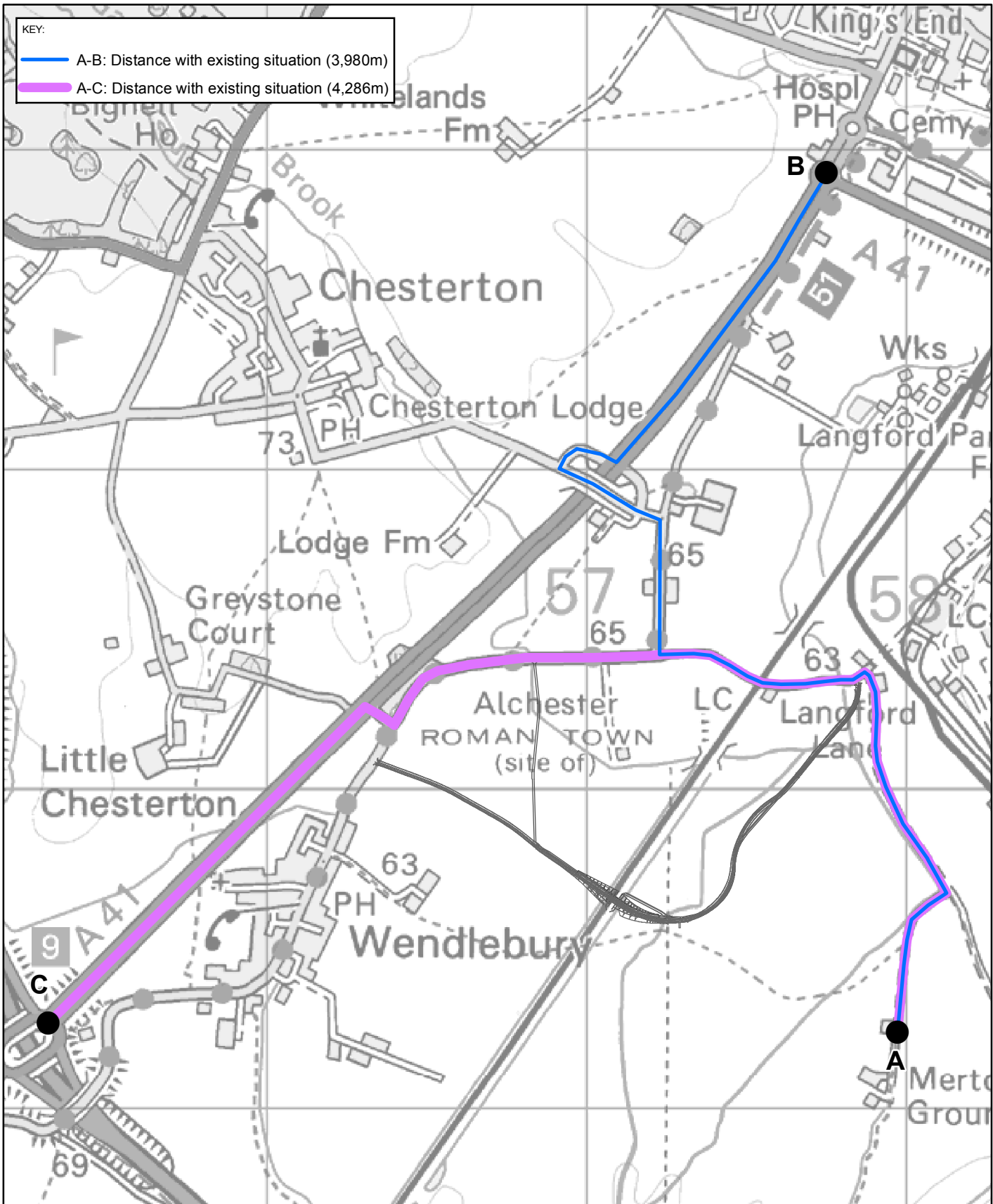
Many thanks,  
Yours sincerely,  
Catherine Quinn

Appendix C

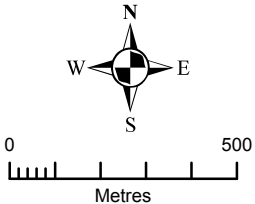
CRCL/R/OBJ230

Figures showing Road Distance





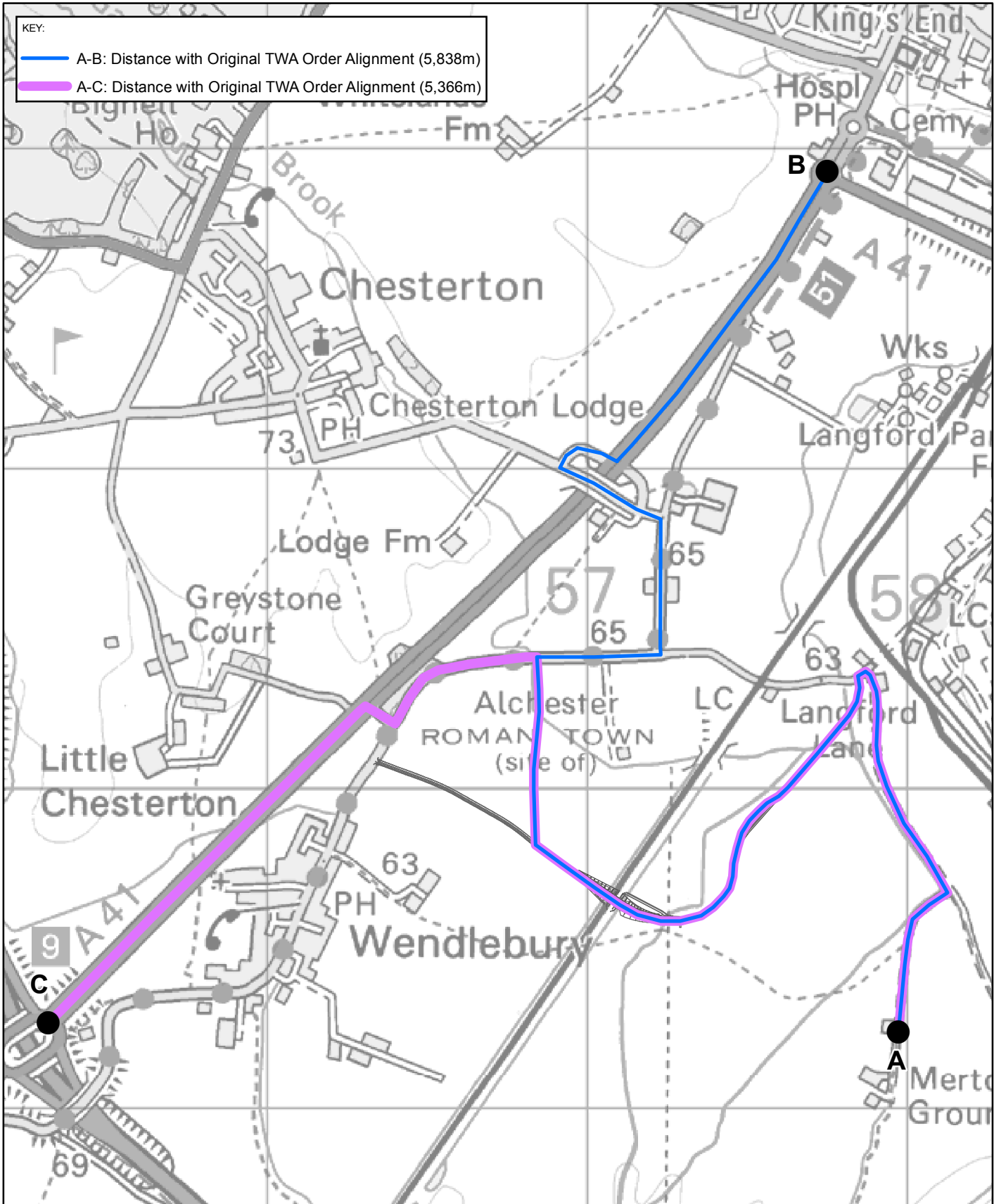
KEY:  
 — A-B: Distance with existing situation (3,980m)  
 — A-C: Distance with existing situation (4,286m)



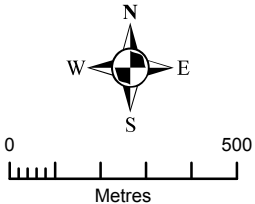
CLIENT: **Chiltern Railways**  
 SIZE: A4  
 ERM  
 2nd Floor  
 Exchequer Court  
 33 Saint Mary Axe  
 London, EC3A 8LL  
 Tel: 020 3206 5200  
 Fax: 020 3206 5440  
 SOURCE: Reproduced from Ordnance Survey digital map data. © Crown copyright. All rights reserved. 2010 License number 0100031673.  
 PROJECTION: British National Grid

TITLE: **Figure OBJ230/1/A  
 Distance by Road with Existing  
 Situation**  
 DATE: 17/11/2010 CHECKED: SLG PROJECT: 0110147  
 DRAWN: IG APPROVED: SCALE: As Scale Bar  
 DRAWING: Footpath\_OBJ190\_1\_A.mxd REV: 0

Fig: 0110147ChilternRGS\_IG\_HFMapaWoringPlanningObjectionsFootpath\_OBJ190\_1\_A.mxd



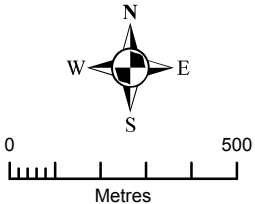
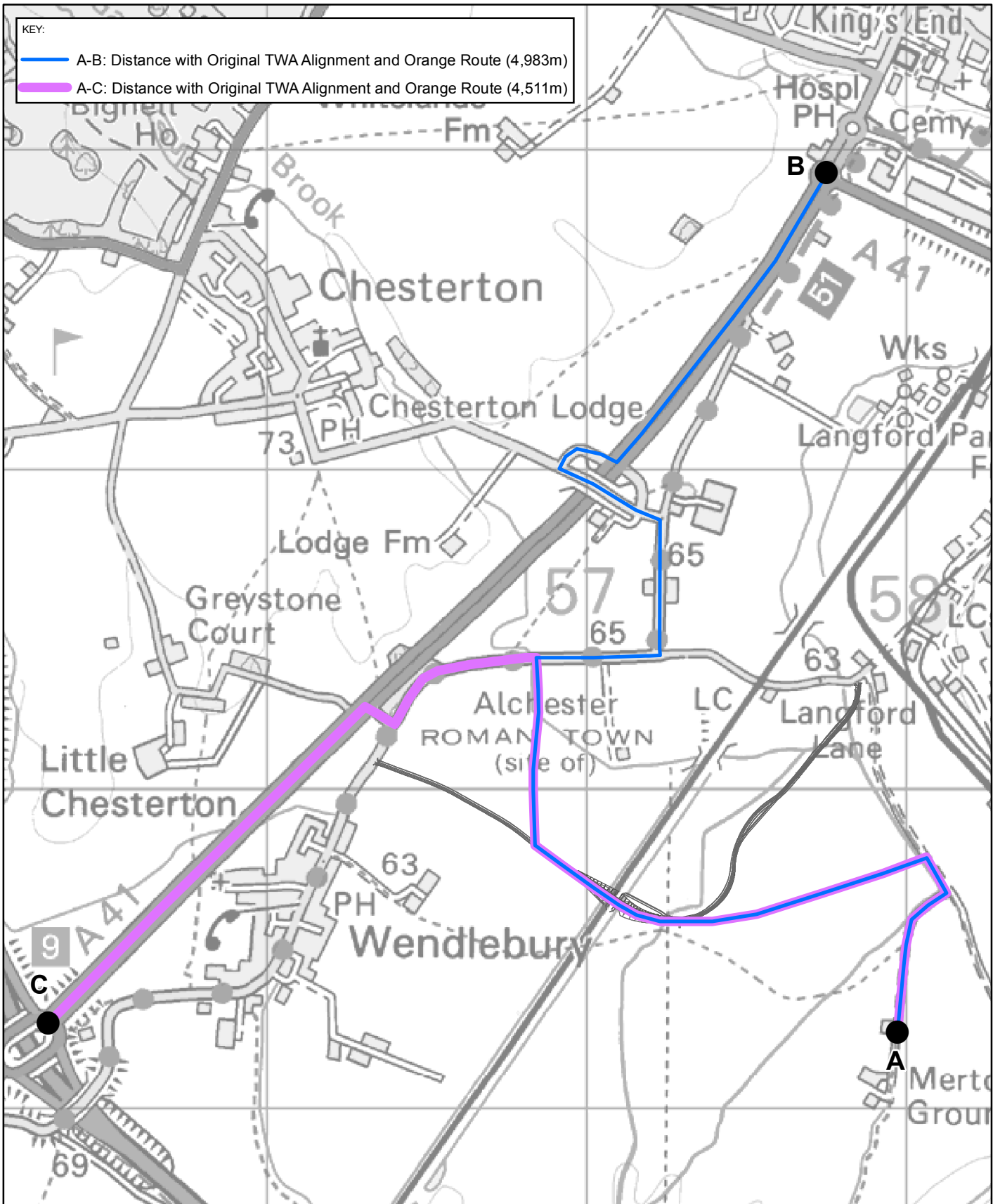
KEY:  
 — A-B: Distance with Original TWA Order Alignment (5,838m)  
 — A-C: Distance with Original TWA Order Alignment (5,366m)



CLIENT: **Chiltern Railways**  
 SIZE: A4  
 ERM  
 2nd Floor  
 Exchequer Court  
 33 Saint Mary Axe  
 London, EC3A 8LL  
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 PROJECTION: British National Grid

TITLE: **Figure OBJ230/1/B  
 Distance by Road with the Original  
 TWA Alignment of Langford Lane**  
 DATE: 17/11/2010 CHECKED: SLG PROJECT: 0110147  
 DRAWN: IG APPROVED: SCALE: As Scale Bar  
 DRAWING: Footpath\_OBJ190\_1\_B.mxd REV: 0

Fig: 0110147ChilternRGS\_IG\_HFMapaWoringPlanningObjectionsFootpath\_OBJ190\_1\_B.mxd



CLIENT: **Chiltern Railways**

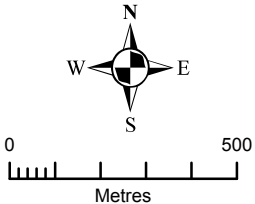
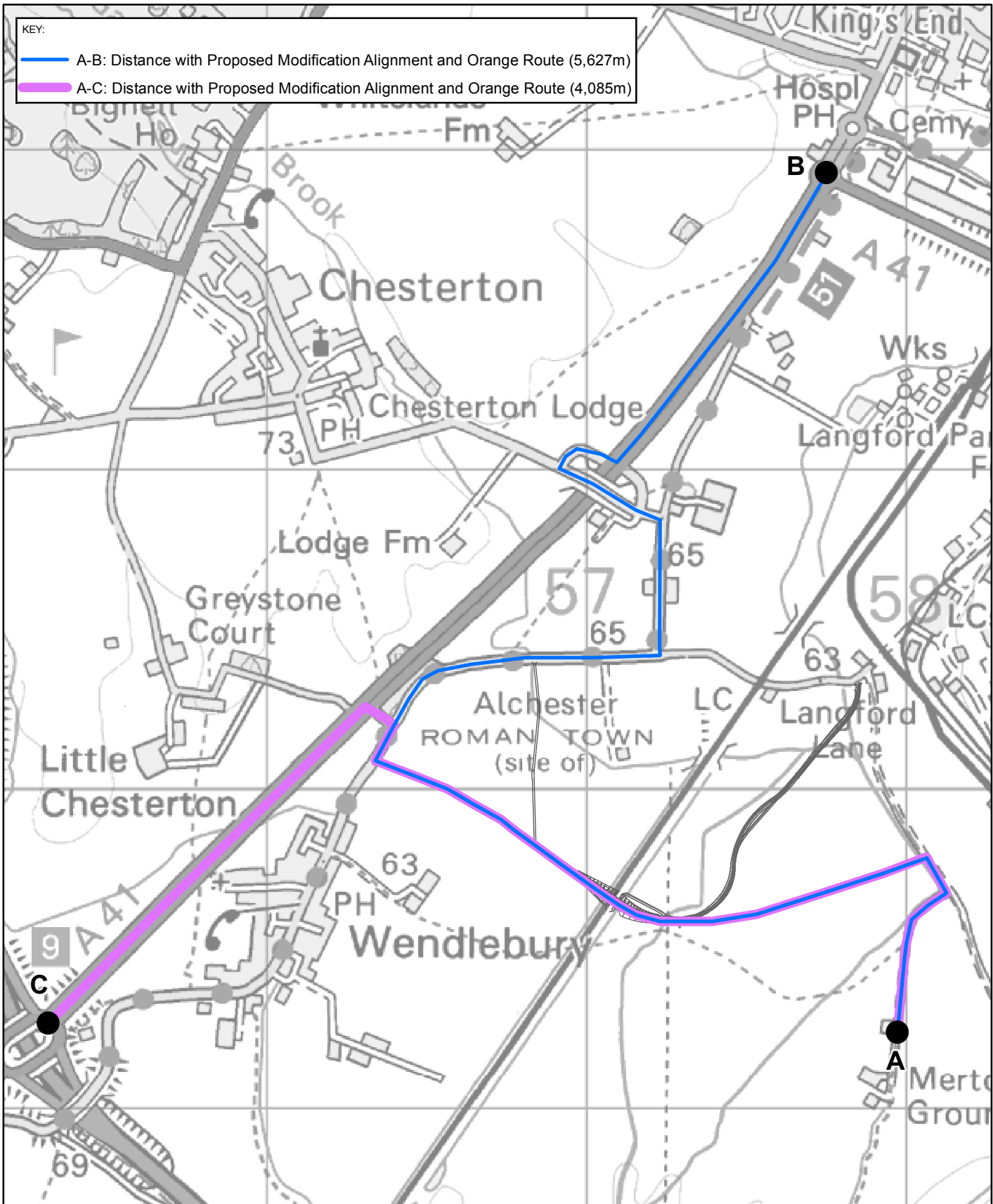
ERM  
2nd Floor  
Exchequer Court  
33 Saint Mary Axe  
London, EC3A 8LL  
Tel: 020 3206 5200  
Fax: 020 3206 5440

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SIZE: **A4**

TITLE: **Figure OBJ230/2/A  
Distance by Road with 'Orange  
Route' and Original TWA Alignment  
of Langford Lane**

DATE: 17/11/2010	CHECKED: SLG	PROJECT: 0110147
DRAWN: IG	APPROVED:	SCALE: As Scale Bar
DRAWING: <b>Footpath_OBJ190_2_A.mxd</b>		REV: <b>0</b>



CLIENT: **Chiltern Railways**

ERM  
2nd Floor  
Exchequer Court  
33 Saint Mary Axe  
London, EC3A 8LL  
Tel: 020 3206 5200  
Fax: 020 3206 5440

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PROJECTION: British National Grid

SIZE: **A4**

TITLE: **Figure OBJ230/2/B  
Distance by Road with 'Orange  
Route' and Revised Alignment  
of Langford Lane**

DATE: 17/11/2010	CHECKED: SLG	PROJECT: 0110147
DRAWN: IG	APPROVED:	SCALE: As Scale Bar
DRAWING: <b>Footpath_OBJ190_2_B.mxd</b>		REV: <b>0</b>