
TRANSPORT AND WORKS ACT 1992

ROTHER VALLEY RAILWAY LIMITED PROPOSED ROTHER VALLEY RAILWAY (BODIAM TO ROBERTSBRIDGE JUNCTION) ORDER

NOTES FOLLOWING THE PRE-INQUIRY MEETING

Held on 24 February 2020

At Woodlands Enterprise Centre, Hastings Road, Flimwell, Wadhurst

1. Introduction

1.1. At the start of the Pre-Inquiry Meeting, the Inspector welcomed all present and introduced himself as **Ian Jenkins** (BSc(Hons) CEng MICE MCIWEM). He has been appointed by the Secretary of State for Transport to hold an Inquiry into the proposed Transport and Works Act Order.

1.2. **Mrs Joanna Vincent** has been appointed as the Programme Officer for the Inquiry. She is a neutral officer of the Inquiry, responsible to the Inspector. Her main duties, under the direction of the Inspector are:

1. keeping records of those attending the Pre-Inquiry meeting and Inquiry;
2. organising and keeping under review the Inquiry programme;
3. organising practical arrangements for the Inquiry, including co-ordinating and advising on appearances;
4. acting as a contact between participants and the Inspector;
5. co-ordinating the receipt and distribution of documents;
6. holding a master set of all documents (inc Inquiry Library) and maintaining document lists; and,
7. planning site visits.

She will play no part in the Inspector's report to the Secretary of State beyond helping with the collation of lists of those appearing at the Inquiry and of Inquiry documents, which will be appended to it.

1.3. The Programme Officer's contact details are given below:

Mrs Joanna Vincent	
Tel.	01483 577091
Mobile no.	07483 133975
Email address	Joanna.vincent@gateleyhamer.com
Postal address	2000 Cathedral Square, Cathedral Hill, Guildford GU2 7YL

2. Scope of the Inquiry

- 2.1. The Inquiry will be into the proposed *Rother Valley Railway (Bodiam to Robertsbridge Junction) Order*.

3. Purpose of the pre-Inquiry meeting

- 3.1. The purpose of the meeting was to enable all concerned to discuss procedural matters relating to the Inquiry, which is due to open on Tuesday, 26 May 2020. It should help everyone to make the best use of their time between now and the Inquiry, and help the proceedings to run smoothly.

4. Parties present and appearances at the Inquiry

- 4.1. Parties appearing at the Inquiry may do so in person and may be represented by counsel, a solicitor or some other representative. The *Transport & Works (Inquiries Procedure) Rules 2004* (TW Inquiry Rules) confirm that the persons entitled to appear at an Inquiry are: the applicant, in this case Rother Valley Railway Limited (RVR); any statutory objector; and, any other person who has served a Statement of Case under Rule 7. It is a matter for the Inspector to determine whether any other person may appear at the Inquiry.
- 4.2. When making a case, prospective participants should bear in mind that if a point is a good one, and is supported by relevant evidence, it needs to be made only once in order to carry weight. Repeating the point will not add to that weight, but will simply waste Inquiry time. With that in mind it may be that arguments for or against the proposals could be made more effectively and succinctly by one person/organisation than by many individuals making the same points in slightly different ways. The Inspector urged parties/individuals to get together wherever possible to present joint cases through a single spokesperson. In order to ensure that the Inquiry is completed as expeditiously as possible, the Inspector will intervene to prevent any unnecessary repetition.
- 4.3. Details of those who identified themselves at the meeting as representing parties who wish to appear at the Inquiry and their proposed representation at the Inquiry, where known, are appended at Appendix 1 (each has a reference number reflecting the nature of their interest for example, OBJ/, SUPP/ or REP/).
- 4.4. The absence of any other party from the pre-Inquiry meeting will not of itself preclude their participation at the Inquiry.
- 4.5. People who do not need or wish to speak at the Inquiry will, nonetheless, be welcome to attend as observers. In considering the Order, the Inspector will take account of all of the evidence heard at the Inquiry as well as written representations received before it closes. However, greater weight can be attached to evidence given at the Inquiry which is open to testing through cross-examination.

5. Inquiry dates and times

- 5.1. The Inquiry is proposed to open at 10.00 hrs on Tuesday, 26 May 2020. It is provisionally estimated that the Inquiry will sit for 16 days over 4 weeks (That is: 26-29 May; 2-5 June; 9-12 June; and, 16-19 June). A better idea of the length of the Inquiry will emerge once estimates of the time needed for the various stages in the Inquiry have been provided by the parties and a programme has been drafted. More on this below in section 12.
- 5.2. The Inquiry will generally sit at the following times:
- Tues-Thurs: 10.00 hrs to about 17.00 hrs (with a break for lunch between around noon and 13.00 hrs, and a short break at a convenient point mid-afternoon);
 - Fridays: 09.30 hrs to early-afternoon (with a shorter lunch break).
- 5.3. Once the Inquiry is underway the Inspector may decide to start earlier and/or finish later. Any changes to sitting times will be announced at the Inquiry.

6. Inquiry venues

- 6.1. The Inquiry is currently planned to be held at 2 venues:
- Robertsbridge Community College, Knelle Road, Robertsbridge, TN32 5EA from 26-29 May; and,
 - Woodlands Enterprise Centre, Hastings Road, Flimwell, Wadhurst, TN5 7PR from 2-5 June, 9-12 June and 16-19 June.
- 6.2. In addition to the main Inquiry room, there will be side rooms for the Inspector and the Programme Officer. Limited photocopying facilities will be available (a reasonable charge may be made for copying). If the parties who intend to appear at the Inquiry need particular facilities they should take the matter up with the Programme Officer.

7. Main issues and areas of agreement

- 7.1. The Secretary of State has circulated a Statement of Matters about which he wishes to be informed. Copies were circulated prior to the pre-Inquiry meeting and the document is available on the Inquiry website, details of which are set out below in paragraph 9.1. Further copies can be obtained from the Programme Officer.
- 7.2. The Inspector asked all parties to have particular regard to this, and to address explicitly all matters identified that are relevant to them, including the scope for mitigating any harm, in the presentation of

evidence. But he stressed that the list is not exhaustive and it does not preclude other matters from being raised if relevant.

- 7.3. The Inspector requested RVR ensures that it responds explicitly to every objection, including those not the subject of representations at the Inquiry. He recognised that RVR's response to an issue raised by more than one objector may be set out only once in its proofs, rather than being repeated for each objector. This being the case the Inspector requested that, accompanying the proofs of evidence, RVR provides a document that identifies the sections of its proofs which deal with the particular objections raised on an objector by objector basis.
- 7.4. The Inspector recognises that in a case of this kind there is usually limited scope for formalising Statements of Common Ground. Nevertheless, it will be in the interests of at least the main parties to reach agreement on as many issues as possible, thereby enabling them to focus on matters of particular importance to them at the Inquiry. The Inspector confirmed that he would welcome written confirmation, as soon as possible, of areas where agreement has been reached, and where any objections are withdrawn as a result.
- 7.5. RVR indicated that it will endeavour to agree common ground with the parties who intend to call expert witnesses. Some progress in that regard has been made with OBJ/178 and REP/17. It is also in discussion with OBJ/782 and will explore the potential for common ground with OBJ/1002. However, RVR confirmed it is unlikely to be practical to agree common ground with other parties, due to the numbers involved and limited time available. OBJ/782 indicated that whilst discussions are ongoing, it does not expect its objections to be entirely resolved.
- 7.6. OBJ/1002 and others made a plea that any agreements reached with other parties by RVR, which may affect their case, be disclosed as soon as possible, for example, revised protective provisions agreed with the OBJ/178. RVR confirmed that it would endeavour to do so. The Inspector encouraged this and indicated that any Statements of Common Ground which are submitted will be posted on the Inquiry website.

8. Inquiry procedure and site visits

Inquiry procedure

- 8.1. At the Inquiry the Inspector will broadly follow the procedure set out in the TW Inquiry Rules. Briefly:
 1. Following his opening announcements, he will invite RVR to make an opening statement, outlining its case; followed by others who

are entitled to appear¹, in the following order: supporters of the proposed Order; objectors; and, other interested parties;

2. The parties may then give evidence in the same order (subject to paragraph 12.3 and 12.4 below). The evidence of each witness will be open to cross-examination by opposing parties entitled to appear and there may be re-examination to clarify answers given in cross-examination². The Inspector may put questions he has at any stage;
3. There will be a session to allow discussion of any proposed modifications to the draft Order;
4. Each party who has given evidence may make closing submissions, summarising their cases in light of the evidence. This is not an opportunity to introduce new evidence. They may do this either at the end of their individual evidence or at the end of the Inquiry;
5. Closing submissions at the end of the Inquiry will be heard in the following order: 'other interested parties'; objectors; supporters; and finally, RVR.

Site visits

- 8.2. The Inspector indicated, so far as practical from public vantage points, he would familiarise himself with the areas subject to the draft Order prior to the Inquiry on an unaccompanied basis, and may make further such visits during or after the Inquiry.
- 8.3. The Inspector may also, if necessary, make accompanied visits to relevant places during or after the Inquiry. If anyone wishes to request that he make an accompanied visit to a particular location, they should send that request to the Programme Officer.
- 8.4. The Inspector emphasised that all visits will be for the sole purpose of observing the sites in question. He will not hear any evidence from the parties to the Inquiry or receive submissions on site. It is important that all that has to be said in evidence should be put at the Inquiry itself.
- 8.5. OBJ/1002 and OBJ/782 asked that the Inspector observe Bank Holiday peak flow conditions on the A21. The Inspector confirmed that he will be undertaking unaccompanied visits to the area on the Bank Holiday Monday 25 May 2020. The Programme Officer will contact those parties to establish the particular periods during which they suggest observations are made.

¹ Rule 14-Statutory objectors and any other person who has served a Statement of Case under Rule 7.

² Rule 18-Network Rail, statutory objectors and any other person who has served a Statement of Case under Rule 7 are entitled to call evidence. Network Rail and statutory objectors are entitled to cross-examine persons giving evidence. The calling of evidence and cross-examination of persons giving evidence shall otherwise be at the Inspector's discretion.

- 8.6. OBJ/652 asked whether, before the Inquiry, it would be possible for the Inspector to visit areas subject to flooding at short notice. The Inspector indicated that it would be unlikely to be practical. Furthermore, if parties have concerns with respect to the effect of the proposed Order on flood risk, the Inquiry provides an opportunity to set out and substantiate their position in their evidence to the Inquiry.
- 8.7. OBJ/133 requested that the Inspector observe traffic conditions associated with pupils leaving local schools in the afternoon. The Inspector indicated that this would be likely to be possible during the course of, or after, the Inquiry.

9. Nature, format and submission of evidence

- 9.1. RVR's Statement of Case confirms that, until the start of the Inquiry, a copy of every document which it intends to put in evidence, together with a copy of every Statement of Case served by every other party (and associated documents) may be inspected at:

Battle Library
7 Market Road
Battle
TN33 0XB.

(Monday closed; Tuesday 1000-1600 hrs; Wednesday 1000-1300 hrs; Thursday 1000-1800 hrs; Friday 1000-1700 hrs; Saturday 1000-1700 hrs; Sunday closed)

Furthermore, another copy is available for inspection at its Robertsbridge office:

Robertsbridge Junction Station
Station Road
Robertsbridge
TN32 5DG
(Wednesdays between 1400-1630 hrs and Sundays between 1000-1500 hrs)

RVR's proofs of evidence will be added to those sets when they are published.

- 9.2. The Inspector confirmed that, so far as practical, the submitted documents will be posted on the Inquiry website at:

<http://rother-valley.gateleyhamer-pi.com/docs>

- 9.3. During the Inquiry a complete set of Inquiry documents will be available in the Inquiry library held by the Programme Officer throughout the proceedings. As many as possible will also be available on the Inquiry website, referred to above.

Statements of case

- 9.4. With reference to Rule 7 of the TW Inquiry Rules, Statements of Case have been submitted by RVR, 7 objectors and 1 supporter.³ REP/17 has also provided a Statement of Case. Any party who has served a Statement of Case who wishes to comment on another party's Statement of Case shall, not later than 6 weeks before the start of the Inquiry, send further comments in writing to the Secretary of State (TWA Orders Unit at the DfT), the applicant and the party whose Statement of Case is the subject of the comment if that party is not the applicant.

Core Documents

- 9.5. It is likely that some reference documents will be referred to by many parties. A number of these have already been submitted by RVR, a list of which is included in Appendix A of its Statement of Case (RVR01-59), and the documents concerned are available on the Inquiry website.
- 9.6. It will save paper, time and expense if others wishing to refer to the same documents would simply refer to them (by document number and internal reference) in their evidence without the need to submit further copies. The Inspector would welcome suggestions for any further documents that could usefully be included as core documents. The Programme Officer will maintain the schedule of core documents.

Proofs of evidence

- 9.7. Where a party proposes to give evidence at the Inquiry by reading from a document (known as a 'proof of evidence'), it should be submitted in advance of the Inquiry. Proofs of evidence should be succinct and to the point. Voluminous documents do not add weight to a case (except in the literal sense) and may detract from it by obscuring the key points. Additional evidence may be given orally, though as far as possible such material would be better included in proofs.
- 9.8. In accordance with the TW Inquiry Rules, if the proofs are longer than 1500 words, summaries of the proofs must be submitted at the same time as the proofs themselves. Summaries should be no more than 1500 words. Only summaries will be read at the Inquiry, but the full proofs will count as evidence and be open to cross-examination.
- 9.9. If, in evidence, reference is made to any other document, which is not included in the list of core documents, a copy of that document (or the relevant extract plus the cover page), must be submitted as an appendix to the proof of evidence. Those who wish to rely on material from the internet must provide printed copies of the material in question, as the content of websites can change and it is important

³ SUPP/177, OBJ/68, 91, 99, 133, 178, 782 and 1002.

that the Inspector and the Secretary of State see the information the witness intends them to see.

- 9.10. The Inspector urges parties to ensure that proofs of evidence and associated documents conform to the following guidelines:
- Document number on the top right corner of cover page and the spine (if practical);
 - Indicate on the cover page the name of the party on whose behalf the evidence is given, the name of the witness, relevant qualifications and the topic(s) covered;
 - Number all pages and paragraphs;
 - Supporting material in appendices, bound separately from the proof and pages numbered;
 - Summary bound separately or as a self-contained section in the proof.

Submission of evidence

Proofs of evidence

- 9.11. The Inspector confirmed that all proofs of evidence should be submitted to the Programme Officer and circulated to others (see 'copies' below) **not later than 27 April 2020** (*4 weeks before the Inquiry*).
- 9.12. In the event that objectors intend to promote alternatives to the proposed works, the Inspector would expect their proofs to include an evaluation of the merits and practicability of the alternative proposed and whether it would meet the aims and objectives set for the original scheme, taking into account, so far as practical, its costs, benefits and comparative impacts, such as on adjoining land owners.

Written Representations

- 9.13. The Inspector requested that if anyone intends to submit additional written representations rather than appearing at the Inquiry, they should make their submissions to the Programme Officer and circulate them to others (see 'copies' below) **by 27 April 2020**.

Rebuttal proofs of evidence

- 9.14. There is no reference in the TW Inquiry Rules to rebuttal proofs. However, they can sometimes be helpful to deal with complex evidence raised for the first time in the proofs of evidence, particularly if they deal with points that could reduce the need for cross-examination and so reduce the Inquiry time. However, they should not be seen as an opportunity to gain a tactical advantage by deliberately withholding evidence until a late stage (see section 11. below).
- 9.15. The Inspector confirmed that following submission of the main proofs of evidence, he will consider justified requests for the submission of

rebuttal proofs. If any are to be submitted, rebuttal proofs should be submitted to the Programme Officer and circulated to others (see 'copies' below) **by the 11 May 2020**.

Copies

- 9.16. The Inspector will require a hard copy of every document submitted, plus a further 2 hard copies for the Inquiry library/Secretary of State and an electronic copy for the Inquiry website. These should be sent to the Programme Officer.
- 9.17. The TW Inquiry Rules specify that copies must also be sent at the same time to the applicant, any statutory objector and anyone who has served a statement of case. The Programme Officer will be able to provide details. The Rules indicate that only 1 copy is to be sent to each of those other parties. The Inspector leaves the parties to negotiate directly if they seek additional copies of each other's evidence or if they wish to exchange documents other than in hard copy.

Opening, closing and legal submissions

- 9.18. The TW Inquiry Rules require those making closing submissions to provide the Inspector with copies of these in writing before the close of the Inquiry. These should if possible be drafted with a view to incorporating them into the Inspector's report as the case for the party concerned. However, the Inspector reserves the right to edit them and to add material drawn from evidence given orally or in documentary form. It would be helpful if copies in electronic form could also be provided.
- 9.19. The Inspector would also find it helpful if hard copies of the texts of opening submissions would be provided at the time of delivery. Hard copies will also be required of any legal submissions.

10. Document numbering

- 10.1. As indicated above, every document should be numbered. The numbering system should be kept as simple as possible, but numbers should be prefixed with an abbreviation to indicate the party on whose behalf it is submitted, followed by a sequential number. For example, a typical RVR document is prefixed with **RVR**. Each supporter/objector/other interested party has been/will be allocated a reference number, which can be confirmed by the Programme Officer, for example OBJ/1. The following numbering system is suggested for documents of witnesses:

OBJ/1/W1/1 - Proof of evidence of witness 1
OBJ/1/W1/2 - Appendices to the proof of evidence
OBJ/1/W1/3 - Summary of the proof of evidence
OBJ/1/W2/1 - Proof of evidence of witness 2
OBJ/1/W2/2 - Appendices to the proof of evidence

OBJ/1/W2/3 - Summary of the proof of evidence etc.

Each party should agree their proposed approach in advance with the Programme Officer, in the interests of consistency and clarity.

- 10.2. Each party should keep an up-to-date list of their documents, providing a copy of the list to the Programme Officer at the beginning of the Inquiry, with an update if necessary at the end.

11. Costs

- 11.1. Normally, parties are expected to meet their own expenses in attending the Inquiry. However, the Secretary of State has the discretionary power to make an order as to the costs of parties at an Inquiry, in effect to award costs to one party against another. Costs may be awarded where a party is found to have behaved unreasonably and thereby caused another party to incur unnecessary or wasted expense.
- 11.2. Everyone has a responsibility to meet the deadlines set for the submission of evidence. The procedure is designed to secure maximum disclosure and exchange of information before the Inquiry takes place, so the proceedings can be conducted efficiently and effectively. The Inspector will seek to ensure that no one gains a tactical advantage by deliberately withholding evidence until a late stage. For example, if late evidence is admitted, it may be necessary to adjourn the Inquiry in order to give others the opportunity to consider and prepare to deal with it. Such circumstances may give rise to an award of costs, associated with wasted or otherwise unnecessary expense, against the party who has submitted the late evidence and caused a delay.

12. Inquiry Programme

- 12.1. The Programme Officer will be contacting all parties who indicate that they intend to appear to gain information needed to draw up a programme for the Inquiry. **In any event, the following information must be submitted to the Programme Officer by 13 May 2020, by all those who intend to appear at the Inquiry to give evidence:**
- The duration of any opening and closing statements, if any are to be made;
 - The duration of evidence in chief for each of their own witnesses; and,
 - The duration of cross-examination of opposing parties' witnesses.
- 12.2. The draft Programme will be available on the website and in the Inquiry Library when the Inquiry is sitting. It will remain in draft and

will be subject to change throughout the Inquiry. It is important that people appearing are available when required, and the onus will be on them to keep in touch with the progress of the Inquiry. If they are not there when required, the Inquiry may proceed without them.

- 12.3. The Inspector explained that arrangements have been made for the first week of the Inquiry to sit at Robertsbridge Community College, in order to provide some opportunity to appear for **parties who** wish to give evidence and **would have particular difficulties accessing the Woodland Enterprise Centre** in subsequent weeks. **Parties who meet those criteria should contact the Programme Officer to discuss their particular circumstances, as soon as possible and in any event, before 13 May 2020** when the programme will be drafted. Depending on the numbers involved, it may become necessary to alter the usual order of giving evidence from that set out above in paragraph 8.1, with some other parties giving evidence before RVR has finished giving its evidence. RVR confirmed that it has no in principle objection to such an approach.
- 12.4. OBJ/1002 suggested that an evening session may be necessary during the course of the Inquiry, in order to provide some opportunity to appear for parties who wish to give evidence and **cannot make arrangements to attend during the day-time. Parties who meet those criteria should contact the Programme Officer to discuss their particular circumstances, as soon as possible and in any event, before 13 May 2020** when the programme will be drafted. Details would be required with respect to the numbers involved and the time likely to be needed, before a decision could be made. No one at the meeting was able to confirm the need for such a session.
- 12.5. The Inspector asked RVR to reflect on the number of witnesses that have been identified at the meeting and give further consideration to whether additional sitting time is likely to be necessary.

13. Other matters

Bus service

- 13.1. The letter sent by the Department for Transport to notify interested parties of the Inquiry arrangements indicated that, after the first week of the Inquiry, a private bus would be run for people who are unable to make their own way to the Woodlands Enterprise Centre by private or public transport. The letter indicated that it would run from Robertsbridge Railway Station at 9.30 am and then back to the station at the close of the Inquiry day. The Inspector made a plea to those people who are likely to need to use the service to confirm that to the Programme Officer as soon as possible.
- 13.2. Once the Inquiry is underway the time for the bus to depart the station may change to suit the Inquiry sitting times. Any changes will be announced in advance at the Inquiry. The need for the service may also be reviewed, if it is not being used.

Miscellaneous

- 13.3. OBJ/1002 and OBJ/782 indicated that the concerns set out in their submissions to date with respect to the adequacy of the Environmental Statement remain. OBJ/1002 also indicated that it is still seeking clarification from RVR with respect to the proposed funding arrangements associated with the Order. RVR stated that these are matters which will be addressed in its evidence.
- 13.4. OBJ/1002 indicated that it intends to contact REP/17 to gain a clear understanding of the information upon which its Statement of Case is based and any limits that may apply to the position set out. In the event that questions remain, it would endeavour to put those in writing before the Inquiry, rather than asking REP/17 to appear to answer questions. REP/17 confirmed that it intends to attend the Inquiry in any event, in case it can be of assistance.
- 13.5. RVR indicated that it may wish to include a short video as part of its proofs of evidence, which it would make arrangements to show at the Inquiry. There was no objection to this, providing it is provided in a format such that parties who wish to are able to view before the Inquiry.

I Jenkins
INSPECTOR

26 February 2020

Appendix 1-Appearances at the Pre-Inquiry meeting***Parties who have duly submitted a Statement of Case***

Rother Valley Railway Limited		RVR (Promoter/applicant)
Rep at PIM	Richard Turney of Counsel.	
Rep at Inq	Richard Turney of Counsel.	
11 Witnesses		
1. The Order-merits/need.		
2. Economics.		
3. Highways-general.		
4. Highways-traffic impact.		
5. Alternatives.		
6. Environment-general.		
7. Environment-ecology.		
8. Environment-flood risk.		
9. Railway safety.		
10. Railway operations.		
11. Impact on landowners.		

Rother District Councillor-I Hollidge		SUPP/177
Rep at PIM	Not present.	
Rep at Inq	TBC.	

P Smith		OBJ/68
Rep at PIM	P Smith.	
Rep at Inq	P Smith.	

Rother District Councillor-S Hart		OBJ/91
Rep at PIM	Not present.	
Rep at Inq	TBC.	

E Hardwick		OBJ/99
Rep at PIM	E Hardwick.	
Rep at Inq	E Hardwick.	

K Bell		OBJ/133
Rep at PIM	K Bell	
Rep at Inq	K Bell	

Environment Agency		OBJ/178
Rep at PIM	Sophie Page.	
Rep at Inq	TBC.	
1 witness-TBC		

Highways England		OBJ/782
Rep at PIM	Richard Honey of Counsel.	
Rep at Inq	Richard Honey of Counsel.	
6 witnesses		
1. Highways engineering.		
2. Railway engineering.		
3. Highway safety/risk assessment.		
4. Construction costs.		
5. Economics.		
6. Highways England-general.		

Mr & Mrs Hoad, the Executors and Trustees of the Noel de Quincy Estate		OBJ/1002
Rep at PIM	Paul Brown QC.	
Rep at Inq	Paul Brown QC.	
4-5 witnesses		
1. Highways (1 or 2)		
2. Flood risk		
3. Economic/social benefits.		
4. Policy/landowner impacts.		

The Office of Rail and Road		REP/017
Rep at PIM	Ian Raxton	
Rep at Inq	Ian Raxton.	

Other parties

David Webster		OBJ/71
Rep at PIM	David Webster.	
Rep at Inq	David Webster.	

Nigel Leigh		OBJ/652
Rep at PIM	Nigel Leigh.	
Rep at Inq	Nigel Leigh.	

Edward Flint		OBJ/61
Rep at PIM	Edward Flint.	
Rep at Inq	Edward Flint.	

Emma Ainslie		OBJ/767
Rep at PIM	Emma Ainslie.	
Rep at Inq	TBC.	
1 witness		
1. Emma Ainslie.		

Harry Wills		OBJ/100
Rep at PIM	Harry Wills.	
Rep at Inq	Harry Wills.	

Emma Watkins		OBJ/25 (200)
Rep at PIM	Emma Watkins.	
Rep at Inq	Emma Watkins.	

Nicholas Moor		OBJ/729
Rep at PIM	Nicholas Moor.	
Rep at Inq	Nicholas Moor.	

Charles Wyndham		OBJ/1035
Rep at PIM	Charles Wyndham.	
Rep at Inq	Charles Wyndham.	