

**LAND TO THE EAST OF M40 AND SOUTH OF A4095
CHESTERTON
BICESTER**

APPEAL REFERENCE: APP/C3105/W/20/3259189

APPEAL BY GREAT LAKES UK LIMITED

**PROOF OF EVIDENCE OF
STEVEN J SENSECALL BA (HONS) DIP. T.P. MRTPI**

**ON BEHALF OF
PARISHES AGAINST WOLF**

JANUARY 2021

Carter Jonas

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1.0 INTRODUCTION

1.1 I am Steven John Sensecall. I have an Honours Degree in Planning Studies and a Graduate Diploma in Conservation and Urban Renewal. I am a member of the Royal Town Planning Institute. I am an Equity Partner at Carter Jonas LLP. I am the firm's Head of Planning & Development for the South and South West. I am also head up the firm's office in Oxford, the address for which of Mayfield House, 256 Banbury Road, Oxford OX2 7DE.

1.2 This Proof of Evidence relates to an appeal by Great lakes UK Ltd ("the Appellant") in respect of Land to the East of M40 and South of A4095, Chesterton, Bicester, OX26 1TH.

1.3 I represent Parishes Against Wolf ("PAW"). PAW is a rule six party in this case. PAW comprises (at the time of writing) 24 Parish Councils, which are listed below:

- Ambrosden
- Ardley with Fewcott
- Bletchington
- Charlton on Otmoor
- Chesterton
- Duns Tew
- Fritwell
- Godington
- Heyford Park
- Kirtlington
- Lower Heyford and Caulcot
- Middle Aston
- Middleton Stoney
- North Aston
- Oddington
- Rousham
- Shipton-on-Cherwell & Thrupp
- Somerton
- Steeple Aston
- Stratton Audley
- Upper Heyford
- Wendlebury
- Weston on the Green
- Woodeaton

1.4 The application the subject of this appeal was submitted to Cherwell District Council ("the Council") on 13 November 2019. It was given the application reference number 19/02550/F. The applicant was Great Lakes Limited. The description of the application was as follows:

"redevelopment of part of golf course to provide new leisure resort (sui generis) incorporating waterpark, family entertainment centre, hotel, conferencing facilities and restaurants with associated access, parking and landscaping".

1.5 The application was refused by notice dated 12 March 2020. Great Lakes Limited appealed the decision. The appeal was given the reference APP/C3105/W/20/3259189.

1.6 The Council's reason for refusal were as follows:

1. *The proposed development by reason of its location would result in the loss of an 18-hole golf when the Local Planning Authority's evidence indicates the course is not surplus to requirements and there is a need for more provision for golf courses in the Bicester sub-area over the plan period. The evidence and proposals for alternative sports and recreation provision included with the application is not considered sufficient to make the loss of the golf course acceptable. The development is contrary to Policy BSC10 of the Cherwell Local Plan 2011-2031 Part 1 which seeks to protect existing sport and recreation provision and enhance the existing provision. It is also contrary to Government guidance contained within the National Planning Policy Framework.*
2. *The proposed development would result in the creation of a substantial leisure and hospitality destination in a geographically unsustainable location on a site largely devoid of built structures and beyond the built limits of the nearest settlement. It has no access via public transport and would not reduce the need to travel or offer a genuine choice of alternative travel modes over the private motor vehicle. Given the predominant guest dynamic (families with children) the majority of trips are likely to be made via private motor vehicle, utilising minor rural roads. Furthermore, the proposal is for retail and leisure development in an out-of-centre location and no impact assessment has been provided as required by Policy SLE2. The Council do not consider that exceptional circumstances have been demonstrated to justify the development in this location, and as such the proposal is contrary to Policies SLE1, SLE2, SLE3, SLE4 and ESD1 of the Cherwell Local Plan 2011-2031 Part 1, Saved Policies T5, TR7 and C8 of the Cherwell Local Plan 1996 and Government guidance contained within the National Planning Policy Framework.*
3. *The proposed development fails to demonstrate that traffic impacts of the development are, or can be made acceptable, particularly in relation to additional congestion at the Middleton Stoney signalised junction of the B4030 and B430. As such the proposal is contrary to Policy SLE4 and ESD15 of the Cherwell Local Plan 2011-2031 Part 1, Saved Policy TR7 of the Cherwell Local Plan 2011-2031 Part 1, Policy 17 of the Oxfordshire Local Transport Plan 4 and Government guidance contained within the National Planning Policy Framework.*
4. *The development proposed, by virtue of its considerable size, scale and massing and its location in the open countryside beyond the built limits of the village of Chesterton, along with its institutional appearance, incongruous design, and associated levels of activity including regular comings and goings, will cause significant urbanisation and unacceptable harm to the character and appearance of the area, including the rural setting of the village and the amenities enjoyed by users of the public right*

of way, and would fail to reinforce local distinctiveness. The proposal is therefore contrary to Policies ESD13 and ESD15 of the Cherwell Local Plan (2011-2031) Part 1, Saved Policies C8 and C28 of the Cherwell Local Plan 1996 and Government guidance contained within the National Planning Policy Framework.

5. *The submitted drainage information is inadequate due to contradictions in the calculations and methodology, lack of robust justification for the use of tanking and buried attenuation in place of preferred SuDS and surface management, and therefore fails to provide sufficient and coherent information to demonstrate that the proposal is acceptable in terms of flood risk and drainage. The proposal is therefore contrary to Policies ESD6 and ESD7 of the Cherwell Local Plan 2011-2031 Part 1 and Government guidance contained within the National Planning Policy Framework.*
6. *In the absence of a satisfactory unilateral undertaking or any other form of Section 106 legal agreement the Local Planning Authority is not satisfied that the proposed development provides for appropriate infrastructure (including highway infrastructure) directly required as a result of the development and necessary to make the impacts of the development acceptable in planning terms, to the detriment of both existing and proposed residents and contrary to Policies SLE4, INF1, and PSD1 of the Cherwell Local Plan 2011-2031 Part 1 and Government Guidance contained within the National Planning Policy Framework*

My Role

- 1.7 Carter Jonas was approached by PAW (previously “the Parish Councils” led by Chesterton Parish Council) in January 2020 to raise objections in relation to the planning application 19/02550/F. This work was undertaken by colleagues in my team at Carter Jonas’ Oxford office in combination with other consultants appointed by Chesterton Parish Council. The letter of objection was submitted to the inquiry as an appendix to PAW’s Statement of Case.
- 1.8 When the appeal was submitted, Carter Jonas was again asked to act on behalf of PAW. Initial work in connection with the appeal was undertaken by my colleague, Peter Canavan. However, he was then faced with a diary clash with another public inquiry, which meant that he was unable to appear at this Inquiry. This led to PAW asking me whether I could step in. Having reviewed the case, I came to the considered view that professionally, I was able to appear on behalf of PAW at this Inquiry and to give detailed planning evidence in support of its case. Having reached that view, my instructions were confirmed.

Professional Experience

- 1.9 I have been in practice as a consultant Town Planner for over 38 years, during which time I have been involved in a wide range of planning applications, appeals, development plan inquiries and Examinations in Public throughout England and Wales.
- 1.10 I am acting currently for a diverse list of clients including the United Kingdom Atomic Energy Authority, the Science and Technology Facilities Council (STFC), Medway Council, Commercial Estates Group, Oxford Preservation Trust, the University of Oxford, Rebellion Film Studios, the Defence Infrastructure Organisation, Berkeley Strategic, Berkeley (Oxford & Chiltern) Limited, Lands Improvement Holdings, Hallam Land, Welbeck Estates, and Müller UK. My CV is attached at **Annex A**.

Scope of My Evidence

- 1.11 In this proof of evidence, I comment on the location of the appeal site and provide an overview of the appeal scheme. Thereafter, I set out the main issues in the appeal before outlining the planning policy framework and any other material considerations. I then set out PAW's case. Finally, I will come to a considered judgement as to where the planning balance lies in this case before setting out my summary and conclusions.
- 1.12 This proof should be read alongside those of:
- Mr Rupert Lyons, Transport witness;
 - Mr Andrew Cook, Landscape witness; and,
 - Mr Dominic Woodfield, Biodiversity witness.

- 1.13 I defer detailed and technical matters of the above matters to the relevant witness.

Declaration

- 1.14 The evidence that I present at this Inquiry has been prepared and is given in accordance with the guidance of my professional institute. I confirm that the opinions are my true and professional opinions.

2.0 THE APPEAL SITE

- 2.1 The appeal site is a roughly triangular shaped parcel of land approximately 18.6 hectares in area. It is currently the western nine holes of the 18-hole golf course of the Bicester Hotel Golf and Spa. The site is located to west of the village of Chesterton; Little Chesterton is approximately 1.3 km to the south; and Bicester is 1.3km from the site to the east.

- 2.2 The site is outside the built-up limits of the village beyond the Chesterton settlement boundary, as defined in the Cherwell Local Plan, and as such is in open countryside.
- 2.3 The site is located immediately to the east of the M40, which runs north to south along the boundary of the site. This boundary is predominantly lined with trees, woodland and established vegetation. Junction 9 is 2.2km to the south of the site. To the southeast of the site is land and buildings associated with Bicester Hotel Golf and Spa. The A4095 road runs roughly east to west, along the north-eastern boundary of the site.
- 2.4 Beyond the A4095 is a mix of agricultural land and 'Bignell Park,' which is a residential property with outbuildings which have been converted into office accommodation. Beyond the M40 to the west of the site is further agricultural land and some farms.
- 2.5 The site contains several landscape features, including ponds, tree cover, some of which provide semi natural woodland and hedgerows. There are also a variety of grasslands, dense scrub throughout the site. The ponds are mostly located in a cluster in the northern part of the site and have been engineered as part of the design of the golf course landscape.
- 2.6 The vegetation on site mainly comprises trees, shrubs and grassland areas. The larger scale and more dense areas of vegetation include tree belts, woodland, areas of scrub and hedgerows which are largely located along the boundaries, but some areas of tree cover punctuate the site itself, with many of the trees and shrubs scattered across the site individually in groups as part of the golf course design and whose purpose is to frame fairways and greens to provide some enclosure. There is established tree cover along the western boundary adjacent to the M40 motorway and along the northern boundary abutting the A4095.
- 2.7 There are two registered parks and gardens within 5km of the site, namely Middleton Park (Grade 2) located 1.4km to the north west, and Kirtlington Park (Grade 2) circa 2.8km to the south west of the site.
- 2.8 A public right of way (PROW) reference 161/6/10 runs through the site and is orientated north south, extending initially from the golf club entrance and running along its driveway passing through the car park, past the club house itself, and runs across the site itself in a north-south orientation to link with the A4095 to the north.

3.0 PROPOSED DEVELOPMENT

3.1 The appeal proposal was submitted by way of a detailed planning application. It comprises:

- 498 bed hotel (27,250m²)
- Indoor water park (8,340m²) with external slide tower (height 22.5m)
- Family entertainment centre including an adventure park, food and beverage and merchandise retail, conferencing and back of house (12,350m²)
- The adventure park will provide activities including ropes course, climbing wall, mini golf, family bowling, arcade games and an interactive role-playing game
- Associated access and landscaping
- 902 new parking spaces
- Public parkland (6 hectares) including nature trails and play spaces

3.2 The water park and hotel proposed would be different to any other resort in UK and Europe. The proposal is by Great Wolf Resorts; an American company which owns and operates a chain of indoor waterparks in United States and Canada. The following is a list of the Great Wolf Resorts across North America according to the company's website¹.

- | | |
|--|---------------------------------------|
| • Anaheim / Garden Grove, California | • New England / Boston, Massachusetts |
| • Atlanta / LaGrange, Georgia | • Niagara Falls, Ontario, Canada |
| • Charlotte / Concord, North Carolina | • Pocono Mountains, Pennsylvania |
| • Chicago / Gurnee, Illinois | • San Francisco / Manteca, California |
| • Cincinnati / Mason, Ohio | • Sandusky, Ohio |
| • Colorado Springs, Colorado | • Scottsdale / Talking Stick, Arizona |
| • Grand Mound, Washington | • Traverse City, Michigan |
| • Grapevine, Texas | • Williamsburg, Virginia |
| • Kansas City, Kansas | • Wisconsin Dells, Wisconsin. |
| • Minneapolis / Bloomington, Minnesota | |

3.3 Having carried out my own research into these sites, I have concluded that, in the main, these resorts are to be found in urban or suburban locations.

¹ <https://www.greatwolfresorts.com/company-overview/#locations>

3.4 The Great Wolf website goes on to explain (with my emphasis) that²:

“In addition to the thrills of enormous indoor water parks, Great Wolf Resorts offers an expansive selection of characters, attractions, activities and dining and shopping outlets that capture family vacation expenditures...”

3.5 The proposed scale of the development is clear: it will result in just under 48,000m² of new floor space with the tallest elements of the scheme, comprising the water slide tower and the hotel, extending to some 22.5 metres and 18 – 20 metres in height, respectively.

4.0 MAIN ISSUES

4.1 Having regard to the reasons for refusal, the appellant’s Grounds of Appeal and PAW’s Statement of Case, the main issues for consideration at this appeal can be summarised as follows:

- i. Conflict with the development plan;
- ii. the appeal site’s unsustainable location;
- iii. unacceptable traffic impacts;
- iv. the likely impacts on the local landscape and the character of the area;
- v. the loss of (at least) half of an existing and well established the golf course;
- vi. the management of drainage and surface water; and
- vii. failure to demonstrate compliance with national and local policies to protect and enhance biodiversity.

4.2 I consider each of these matters in turn and in detail in the subsequent sections of this proof of evidence.

5.0 PLANNING POLICY FRAMEWORK

5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004, read with section 70(2) of the Town and Country Planning Act 1990, requires planning applications and appeals to be determined in accordance with the policies of the Development Plan unless material considerations indicate otherwise.

The Development Plan

5.2 The relevant Development Plan for these purposes comprises:

- The Adopted Cherwell Local Plan 2011-2031 (Part 1)

² <https://www.greatwolfresorts.com/partnership-opportunities/>

- The Adopted Cherwell Local Plan 2011-2031 (Part 1) Partial Review - Oxford's Unmet Housing Need
 - Saved policies in the Adopted Cherwell Local Plan 1996
- 5.3 The site is not allocated for development in the Development Plan; to the contrary the site is protected for its sporting provision. On its face, the appeal proposal is therefore contrary to the Development Plan.

Cherwell Local Plan 2011-2031 Part 1 (Adopted 20th July 2015)

- 5.4 The Cherwell Local Plan explains at paragraph A.29 that sustainable development is about change for the better. It is about positive growth, making economic, environmental and social progress for this and future generations. To achieve sustainable development, economic, social and environmental gains should be sought jointly.
- 5.5 Paragraph 1.9 of the Local Plan confirms that Bicester and Banbury are the most sustainable locations for growth, with the plan seeking to strengthen the role of both towns as the centre of the local economy set within a "rural hinterland" (my emphasis).
- 5.6 The Local Plan contains various strategic development areas at Bicester, as a strategy to promote growth. Three of the strategic development areas include hotels as part of the expected leisure provision requirements:
- South West Bicester Phase 2 (**Policy Bicester 3**)
 - Bicester Business Park (**Policy Bicester 4**)
 - Former RAF Bicester (**Policy Bicester 8**)
- 5.7 Chesterton, by comparison, is identified as a Category A Village (**Policy Villages 1**), which would be suitable for minor development, infilling and conversions.
- 5.8 Policy BSC10: Open Space, Outdoor Sport and Recreation Provision states that – amongst other measures – the Council will ensure that enough quantity and quality of, and convenient access to open space, sport and recreation provision will be secured through protecting existing sites.
- 5.9 Policy SLE1: Employment Development seeks to focus employment-generating development:

"...on existing employment sites. On existing operational or vacant employment sites at Banbury, Bicester, Kidlington and in the rural areas employment development, including intensification, will be permitted

subject to compliance with other policies in the Plan and other material considerations.”

And goes on to explain that:

“Employment proposals at Banbury, Bicester and Kidlington will be supported if they meet the following criteria:

- *Are within the built-up limits of the settlement unless on an allocated site*
...
- *Have good access, or can be made to have good access, by public transport and other sustainable modes*
- *Meet high design standards, using sustainable construction, are of an appropriate scale and respect the character of its surroundings*
- *Do not have an adverse effect on surrounding land uses, residents and the historic and natural environment.”*

The policy states also that:

“Unless exceptional circumstances are demonstrated, employment development in the rural areas should be located within or on the edge of those villages in Category A (see Policy Villages 1).”

And that:

“New employment proposals within rural areas on non-allocated sites will be supported if they meet the following criteria:

...

- *Sufficient justification is provided to demonstrate why the development should be located in the rural area on a non-allocated site.*
- *They will be designed to very high standards using sustainable construction and be of an appropriate scale and respect the character of villages and the surroundings.*
- *They will be small scale unless it can be demonstrated that there will be no significant adverse impacts on the character of a village or surrounding environment.*

- *The proposal and any associated employment activities can be carried out without undue detriment to residential amenity, the highway network, village character and its setting, the appearance and character of the landscape and the environment generally including on any designated buildings or features (or on any non-designated buildings or features of local importance).*
 - *The proposal will not give rise to excessive or inappropriate traffic and will wherever possible contribute to the general aim of reducing the need to travel by private car.*
 - *There are no suitable available plots or premises within existing nearby employment sites in the rural areas.”*
- 5.10 Policy SLE2: Securing Dynamic Town Centres directs “Main Town Centre Uses” towards the town centres of Banbury and Bicester and the village centre of Kidlington.
- 5.11 Policy SLE3: Supporting Tourism Growth identifies demand for hotel provision in the county. The policy references that demand and states that proposals for new or improved tourist facilities that increase overnight stays will be supported within the District, provided they are in *sustainable* locations.
- 5.12 Policy SLE4: Improved Transport and Connections states that financial and/or in-kind contributions will be required to mitigate the transport impacts of development. It also clarifies that development that is not suitable for the roads that serve the development, and which have a severe traffic impact will not be supported. Chesterton village is served by minor roads, including Alchester Road and Green Lane.
- 5.13 Policy ESD1: Mitigating and Adapting to Climate Change sets a general context within which to mitigate and adapt to climate change. The policy is to balance the needs for growth against their direct impacts and effects on the environment and especially the climate. Policy ESD1 reiterates the importance of locating development in sustainable locations; promotes sustainable construction techniques; and seeks the use of resources more efficiently, including water.
- 5.14 Policy ESD6: Sustainable Flood Risk Management explains Cherwell District Council’s approach to managing flood risk. The policy includes a sequential approach to development which avoids areas of highest risk. It also includes the requirement from flood risk assessment to support certain types of development proposals.
- 5.15 Policy ESD7: Sustainable Drainage Systems sets out the Council's approach to Sustainable Drainage Systems (SuDS). All development is required to use sustainable drainage systems (SuDS) for the management of surface water run-off. Potential flooding and pollution risks from surface water can be

reduced by reducing the volume and rate of water entering the sewerage system and watercourses.

5.16 Turning specifically to the efficient use of water, Policy ESD8 states that the Council will seek to maintain water quality, ensure adequate water resources and promote sustainability in water use.

5.17 Policy ESD13: Local Landscape Protection and Enhancement sets out a range of factors that would limit the approval of development proposals in respect of settlement character (the settlement of Chesterton has a distinct rural character which should be protected and enhanced), including the following:

- *The proposal is inconsistent with local character*
- *The proposal would harm the setting of settlements*
- *The proposal would harm the historic value of the landscape*

5.18 Chesterton Conservation Area encompasses most of the village. Policy ESD15 sets out criteria for new development proposals that could potentially impact on such areas:

- *Development of all scales should be designed to improve the way an area functions*
- *Support the efficient use of land and infrastructure, through appropriate land uses, mix and density/development intensity*
- *Contribute positively to an area's character and identity by creating or reinforcing local distinctiveness and respecting local topography and landscape features, including skylines, valley floors, significant trees, historic boundaries, landmarks, features or views, in particular within designated landscapes, within the Cherwell Valley and within conservation areas and their setting*

Cherwell Local Plan 1996 Saved Policies

5.19 Proposals for new hotels, motels, guest houses and restaurants in the countryside are covered by saved Policy T5. The application site sits outside of the built-up limits of Chesterton. The site is therefore deemed to be in open countryside. Saved Policy T5 suggests that development proposals in this location must either:

- i) *Be largely accommodated within existing buildings which are suitable for conversion or for such use, OR*
- ii) *Totally replace an existing commercial use on an existing acceptably located commercial site.*

- 5.20 The explanatory text for Policy T2 states that large establishments will generally be unacceptable in smaller villages. It states also that the Council supports the provision of new hotel, motel, guest houses and restaurants within settlements, provided that the nature of the proposed development is compatible with the size and character of the settlement and there are no adverse environmental or transportation affects resulting from the proposal.
- 5.21 Saved Policy TR7: Development attracting traffic on minor roads states that development that would regularly attract large commercial vehicles or large numbers of cars onto unsuitable minor roads will not normally be permitted.
- 5.22 Saved Policy C8: Sporadic development in the countryside confirms that sporadic development in the open countryside will generally be resisted. The accompanying text for the policy states that development in the countryside must be resisted if its attractive, open, rural character is to be maintained. It also states that Saved Policy C8 will apply to all new development proposals beyond the built-up limits of settlements.
- 5.23 Policy C28: Layout, design and external appearance of new development outlines that *“control will be exercised”* over all new development, including conversions and extensions, to ensure that the standards of layout, design and external appearance, including the choice of external finish materials, are sympathetic to the character of the urban or rural context of that development.

The National Planning Policy Framework

- 5.24 The National Planning Policy Framework (“the Framework”) is a material consideration in the determination of planning appeals. The policies in the Framework that are relevant to consideration of the appeals are discussed in detail in subsequent sections of this proof.
- 5.25 Paragraph 8 in the Framework states that:

“Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):

- a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*
- b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by*

fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and

- c) an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.”*

- 5.26 Paragraph 11 requires that Local Plans and planning decisions should apply a presumption in favour of sustainable development.
- 5.27 Paragraph 15 reinforces the primacy of development plans and states that the planning system should be “genuinely plan-led”.
- 5.28 Regarding rural enterprise and development, the Framework includes the following text at paragraphs 83 and 84:

“83. Planning policies and decisions should enable:

- a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings;*
- b) the development and diversification of agricultural and other land-based rural businesses;*
- c) sustainable rural tourism and leisure developments which respect the character of the countryside; and*
- d) the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.*

84. Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport). The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist.”

- 5.29 Where leisure proposals are to be considered by a planning authority the Framework offers the following direction at paragraphs 89 and 90:

“89. When assessing applications for retail and leisure development outside town centres, which are not in accordance with an up-to-date plan, Local Planning authorities should require an impact assessment if the development is over a proportionate, locally set floorspace threshold (if there is no locally set threshold, the default threshold is 2,500m² of gross floorspace). This should include assessment of:

- a) the impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal; and*
- b) the impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and the wider retail catchment (as applicable to the scale and nature of the scheme).*

90. Where an application fails to satisfy the sequential test or is likely to have significant adverse impact on one or more of the considerations in paragraph 89, it should be refused.”

5.30 Also, of relevance to this proposal is paragraph 98, which requires:

“Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails.”

5.31 Paragraph 103 of the Framework which states that:

“significant development should be focussed on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.”

5.32 Moreover, paragraph 103 states that:

“Significant development should be focussed on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.”

5.33 Paragraphs 148 and 149 outlines the role of the planning system and planning decisions in engaging with the challenges of climate change including:

“...Shap[ing] places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy...”

“...taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures...”

5.34 Paragraph 155 states that:

“Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas of the highest risk, they should consider the cumulative impacts in or affecting local areas susceptible to flooding.”

5.35 And paragraph 170, which recognises that:

“Planning policies and decisions should contribute to and enhance the natural and local environment by... recognising the intrinsic character and beauty of the countryside...[and] minimising impacts on and providing net gains for biodiversity...”

Planning Practice Guidance

5.36 Paragraph: 012 Reference ID: 2b-012-20190722 in the PPG provides guidance as to how locational requirements be considered in the sequential test?

Use of the sequential test should recognise that certain main town centre uses have particular market and locational requirements which mean that they may only be accommodated in specific locations. Robust justification will need to be provided where this is the case, and land ownership does not provide such a justification.

5.37 The policies listed above are cited in the Council's reasons for refusal and are, in my view, all relevant to consideration of the appeal proposal. These policies (and the guidance in the Framework) are discussed in more detail below.

6.0 PARISHES AGAINST WOLF'S CASE

The Appeal Proposal is in an Unsustainable Location

6.1 The Council's second reason for refusal states that:

“The proposed development would result in the creation of a substantial leisure and hospitality destination in a geographically unsustainable location on a site largely devoid of built structures and beyond the built limits of the nearest settlement. It has no access via public transport and would not reduce the need to travel or offer a genuine choice of alternative travel modes over the private motor vehicle...”

- 6.2 The Council has made a broad identification of sustainable locations – i.e., at Banbury and Bicester – as preferred locations for growth. Moreover, Strategic Objective 12 of the Local Plan, confirms that (with my emphasis):

“...development will be focussed in Cherwell’s sustainable locations, making efficient and effective use of land, conserving and enhancing the countryside and landscape and the setting of its towns and villages.”

- 6.3 The appellant suggested in its Statement of Case at paragraph 2.3 that based on its close proximity to Bicester and the proposed public transport links, the site is in a sustainable location. The appellant also refers to the site being ‘close to the rapidly expanding settlement of Bicester.’ This, however, ignores the clear separation of Bicester and Chesterton and indeed the site from Chesterton. The site can, in no logical way, be described as compliant with Policy SLE3.

- 6.4 Furthermore, the proposed development does not comply with saved Policy T5. There are no buildings on the proposed development site and the development cannot therefore be accommodated within converted existing buildings, as required by criterion (i). Furthermore, I do not consider that the proposals comply with criterion (ii) of Policy T5 because the proposed development site only contains half of the current golf course at Bicester Hotel, Golf & Spa. Therefore, only half of the current existing commercial use would be replaced and for this proposal to be policy compliant, it ought to “totally replace” what is currently in place.

- 6.5 Turning to the sustainable transport accessibility of the proposal site; it is disconnected from Bicester and the M40. It is reached by minor roads through rural villages. There is no significant public transport service to the site, and it is some distance from the nearest railway stations³. This renders the appeal site isolated, and in an unsustainable location.

- 6.6 The Framework confirms that there is a general presumption in favour of sustainable development at paragraphs 8 and 11 as explained above, and further at paragraph 3 that it “*should be read as a whole.*”

- 6.7 With regard the promotion of sustainable transport, paragraph 103 states that:

“Significant development should be focussed on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.”

- 6.8 The Framework does not define the term ‘significant development’. However, the glossary (at Annex 2) defines non-residential major development as “*additional floorspace of 1,000m² or more, or a site of 1 hectare or more*”.

³ Bicester Village railway station (on the Oxford-Bicester Line) and Bicester North railway station (on the Chiltern Main Line).

Reasonably, therefore, I consider that the appeal proposal amounts to significant development.

- 6.9 In respect of the consideration of development proposals, paragraph 108 of the Framework states that:

“it should be ensured that... appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location”.

- 6.10 Policy SLE4: Improved Transport and Connections of the Cherwell Local Plan also states that:

“All development where reasonable to do so, should facilitate the use of sustainable modes of transport to make the fullest possible use of public transport, walking and cycling.”

- 6.11 Policy ESD1 states that:

“Measures will be taken to mitigate the impact of development within the District on climate change.... Delivering development that seeks to reduce the need to travel and which encourages sustainable travel options including walking, cycling and public transport to reduce dependence on private cars.”

- 6.12 The development will generate a very significant number of trips and by virtue of being situated in a rural, isolated and unsustainable location neither reduces the need to travel; nor dependence on private cars.

- 6.13 The proposals do include measures aimed at improving sustainable accessibility to the site, but these are unlikely to achieve the desired outcome.

- 6.14 Mr Lyons, in his evidence, considers in detail the package of measures to improve the sustainable accessibility of the appeal site. A key conclusion which he draws from the evidence presented by the appellant is that there is a significant gap. This gap in the appellant's case is the lack of analysis regarding the likelihood that visitors and staff at the appeal proposal will actually use the package of measures and neither is there an assessment of their influence on mode of travel choice.

- 6.15 The proposals include the creation of a new footway between the site and Chesterton, along the A4095. However, it is unclear as to how this will encourage walking to/from the appeal site given the extent of the catchment area. Similarly, it is also considered highly unlikely that any visitors will cycle to the site, given the size of the catchment area and lack of dedicated cycling facilities on the A4095, as well as the likely need for luggage.

- 6.16 The Transport Assessment states that National Cycle Network Route 51 (NCN51) runs alongside the A41 Oxford Road south east of the site and is a traffic-free shared pedestrian and cycle route. This is not correct: beyond the Bicester Avenue Home and Garden Centre, the route becomes an on-road route requiring cyclists to cycle alongside vehicular traffic. Considering the likely family nature of typical guest groups (typical room occupancy is 4.5 guests per room including children according to TA para 5.16), even if visitors were prepared to cycle to the site, the lack of cycle routes will discourage most groups from cycling.
- 6.17 The above places great importance upon the use of public transport to reduce dependency on private cars but, as the appellant acknowledges, only one bus service operates per day between Chesterton and the site. This service is a one-way service and departs Chesterton at 07:25 (Monday-Friday). The absence of any bus service back to Chesterton and the infrequency of this one-way service are insufficient to serve a development of this scale. In this respect, the proposed shuttle bus from the site to Bicester Village and Bicester North railway stations could encourage visitors to travel by train.
- 6.18 However, in practice, the shuttle bus of unspecified size offers a poor, infrequent service and will do little to encourage sustainable travel. At a frequency of once every 2 hours (between 9.00am and 5.00pm (i.e. five services per day)), the shuttle bus is impractical and unattractive. Rather than encouraging the use of public transport, I consider that the additional travel-time penalty is likely to discourage those who would otherwise consider travelling by train. Those that do travel by train may have to wait a considerable amount of time at the station. It is also unclear as to what would be done if the shuttle bus were full.
- 6.19 Considering the potential staff on site, and while a staff shuttle bus is also in theory positive, this is again considered unlikely to encourage any meaningful amount of sustainable travel, with similar issues to the visitor shuttle bus.
- 6.20 Mr Lyon's assessment indicates that the modal share for visitors will be 98% in favour of private cars. For staff at the site, Mr Lyons' calculates that car dependency is likely to be in the order of 91.7%. This, I can only conclude, is contrary to the Development Plan and specifically Local Plan policies SLE1, SLE4 and ESD1. It is also contrary to paragraphs 103 and 108 in the Framework. The harms should be given significant weight
- 6.21 Accordingly, my considered view is that the unsustainable nature of the proposals (especially given the location of the site) weigh heavily against the grant of permission.

Unacceptable Traffic Impacts

- 6.22 The Council's third reason for refusal states that:

“The proposed development fails to demonstrate that traffic impacts of the development are, or can be made acceptable, particularly in relation to additional congestion at the Middleton Stoney signalised junction of the B4030 and B430...”

6.23 Chesterton village is served by minor roads, including Alchester Road and Green Lane. The character of the surrounding highway network is inconsistent with the character and type of roads required to support a scheme of the scale and nature of the appeal proposal. The cumulative impact of the appeal proposal would result in unacceptable transport impact on these roads.

6.24 At paragraph 108 of the Framework, it states:

“it should be ensured that... any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.”

6.25 Also, at paragraph 109 of the Framework it states that:

“Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.”

6.26 Policy SLE4: Improved Transport and Connections of the Cherwell Local Plan states that:

“financial and/or in-kind contributions will be required to mitigate the transport impacts of development.”

6.27 It also clarifies the District Council's position that:

“development that is not suitable for the roads that serve the development, and which have a severe traffic impact will not be supported.”

6.28 Moreover, Saved Policy TR7 (Development attracting traffic on minor roads) states that:

“Development that would regularly attract large commercial vehicles or large numbers of cars onto unsuitable minor roads will not normally be permitted.”

6.29 Mr Lyons, in his evidence, has made a very detailed assessment of the appellant's Transport Assessment. Mr Lyons' assessment shows that the Appellant has under-estimated the traffic attractiveness of the appeal proposal

such that the car parking accumulation assessment is unreliable. Similarly, that the capacity analyses are equally unreliable because they are predicated on an unrealistic assessment of both the quantum and assignment of traffic that will be attracted to the appeal proposal.

- 6.30 Mr Lyons notes also that the appeal proposal includes for the provision of conferencing facilities, which may well interact with the proposed hotel accommodation and restaurant facilities but that are likely to attract traffic that is unrelated to the proposed waterpark and family entertainment centre. No effort has been made in the Appellant's evidence base to account for such additional trips and the consequential additional demand for car parking or impact on the adjacent public highway network.
- 6.31 With regard to the likely trip attraction of the appeal proposal, Mr Lyons critically assesses and challenges the Appellant's proxy sites in California, North Carolina and Texas in the United States of America are acceptable, especially noting that in the Appellant's presentation to the District Council on 5 February 2019, and with reference to vacation patterns, it noted that families in the United Kingdom take 19% more trips annually than families in the United States of America. No effort is made in the Appellant's evidence base to consider the implication of that on the application of foreign data, nor the effect of other transport related characteristics may have on the number and profiles of trips to and from the appeal proposal.
- 6.32 Mr Lyons has therefore undertaken a *first principles*-based analysis of the likely traffic attraction of the appeal proposal to provide a more reliable assessment.
- 6.33 Mr Lyons' concludes from his *first principles*-based analysis that the appellant is likely to have underestimated the traffic impact of the appeal proposal on the various junctions referenced in its TA.
- 6.34 My conclusion based in the above, is that the proposals are contrary to the Development Plan and specifically Local Plan policy SLE4 and saved policy TR7, moreover, it is contrary to the Framework at paragraphs 108 and 109.
- 6.35 Mr Lyons' concludes also that the Appellant's Parking Accumulation Assessment appears inconsistent with its own evidence base and the typical operational parameters that it has defined. His 'first principles' parking demand analysis suggests that the appeal proposal provides insufficient car parking such that it will give rise to inappropriate parking on the verges (or the proposed foot/ cycleway) along the A4095 or elsewhere in Chesterton. This must weigh heavily against the grant of permission.

Local Landscape, Character and Design

- 6.36 The Council's fourth reason for refusal states that:

“The development proposed, by virtue of its considerable size, scale and massing and its location in the open countryside beyond the built limits of the village of Chesterton, along with its institutional appearance, incongruous design, and associated levels of activity including regular comings and goings, will cause significant urbanisation and unacceptable harm to the character and appearance of the area, including the rural setting of the village and the amenities enjoyed by users of the public right of way, and would fail to reinforce local distinctiveness.”

6.37 The proposals would be incongruous, excessive, and certainly out of place in a rural landscape around the appeal site, which is typified by rolling countryside and small villages. The Framework at paragraph 170 recognises that:

“Planning policies and decisions should contribute to and enhance the natural and local environment by...(b) recognising the intrinsic character and beauty of the countryside...”

6.38 Moreover, the proposals disregard the Cherwell Local Plan Strategic Objective 12, which is very clear (with my emphasis):

“...development will be focussed in Cherwell’s sustainable locations, making efficient and effective use of land, conserving and enhancing the countryside and landscape and the setting of its towns and villages.”

6.39 The settlement of Chesterton has a distinct rural character which should be protected and enhanced. Policy ESD13: Local Landscape Protection and Enhancement sets out a range of factors that would limit the approval of development proposals in respect of settlement character, including the following:

- *The proposal is inconsistent with local character*
- *The proposal would harm the setting of settlements*
- *The proposal would harm the historic value of the landscape*

6.40 Policy ESD 15: The Character of the Built and Historic Environment, meanwhile, sets out other criteria for new development proposals as follows:

- *Development of all scales should be designed to improve the way an area functions*
- *Support the efficient use of land and infrastructure, through appropriate land uses, mix and density/development intensity*
- *Contribute positively to an area’s character and identity by creating or reinforcing local distinctiveness and respecting local topography and landscape features, including skylines, valley floors, significant trees, historic boundaries, landmarks, features or views, in particular within*

designated landscapes, within the Cherwell Valley and within conservation areas and their setting

- 6.41 Two saved policies from the Local Plan 2006 are also relevant here. First, Policy C8: sporadic development in the open countryside, states that:

“Sporadic development in the open countryside including developments in the vicinity of motorway or major road junctions will generally be resisted.”

- 6.42 Second, Policy C28: Layout, design and external appearance of new development, outlines that:

“Control will be exercised over all new development, including conversions and extensions, to ensure that the standards of layout, design and external appearance, including the choice of external finish materials, are sympathetic to the character of the urban or rural context of that development. In sensitive areas such as conservation areas, the Areas of Outstanding Natural Beauty and Areas of High Landscape Value, development will be required to be of a high standard and the use of traditional local building materials will normally be required.”

- 6.43 The appellant contends that the effects of the proposal on the landscape are negligible and can be mitigated where necessary. Mr Cook’s evidence demonstrates that this is not the case and that in fact the effects of the development will have an unacceptable and detrimental impact on the rural setting of the village of Carterton, as well as the amenities enjoyed by the users of public rights of way and highways in the locality.

- 6.44 Mr Cook’s conclusions regarding seven areas of landscape and character effects are summarised below.

Size, Scale and Massing

- 6.45 The proposals are set in a rural landscape at its heart punctuated with a number of estate parklands with associated country houses but even these very large properties pale into insignificance in terms of size, scale and massing when compared with the Great Lodge resort built complex. This is also borne out by reference to the development footprint of the proposal in appendix 5 which shows the greying of the local landscape and just how the proposed development would be at odds in terms of size, scale and massing. As a consequence of these parameters, the proposed development would cause significant urbanisation on site and have a strong urbanising influence on adjacent countryside.

Location in the Open Countryside

- 6.46 Significant urbanisation would come about as a consequence of this scheme. This perhaps might be wholly appropriate in an urban environment, such as Bicester or other nearby town, a benchmark being the landscape grain analysis, appendix 5. However, the appeal site is not in a town. Indeed, it is not even edge of town but located some distance away from any sizeable settlements in the area and as such is located in countryside both in terms of the Development Plan and in reality. The countryside is locally defined by a range of green infrastructure, primarily comprised of farmland subdivided into fields punctuated with some estate parklands. As such, for the reasons articulated the development proposed would be located in open countryside yet cause significant urbanisation, both on and near site.

Appearance, Design and Activity Causing Urbanisation

- 6.47 The area's characterisation (*Wooded Estate Lands*) informs the appearance of the area. Whilst there is some built form locally, it is relatively modest and recessive in nature and adopts a low visual profile and as such the appearance of the landscape is overwhelmingly rural in character. Such significant urbanisation of the site would be unacceptably harmful to the appearance of the area.

Local Landscape Character

- 6.48 The local landscape type (*Wooded Estatelands*) provides a clue in the name as to what is present locally, i.e., a relatively wooded landscape but with parkland estates. The golf course in terms of its landscape character when considered in its totality has significant commonality with these parklands which collectively reflect and are the characteristics that define the local landscape.

General Visual Amenity

- 6.49 A public right of way currently runs through the site and benefits from the golf course's visual amenity that provides an attractive context to the route. For the length of footpath within the site itself, this amenity would be totally lost as a consequence of the development. With the development in place, users of this route would have to take the diverted route passed and alongside the monolithic building complex, walk alongside the internal roads and car park with associated traffic movement to exit the site and come onto the Kirtlington Road. At which point, pedestrians would have to walk in the roadway as no pavement is present in a rural lane until re-joining the unaffected route further west, having crossed over the arrival entrance access point with associated vehicle movements. Such change in the viewing experience for users of this route would be significant adverse and materially harm the amenity of the route and its appreciation.

Local Distinctiveness

- 6.50 Analysis of the American resorts reveals the standard approach to the building complex and resort design which has been lifted and placed on the site with no genuine regard to the site specific and circumstances pertaining to the site's landscape context. There is no element associated with this scheme that either respects, conserves or enhances the local distinctiveness of the site and its rural context as explained in Mr Cook's proof. Put simply, the appeal scheme fails to reinforce the local distinctiveness of the area.

Rural Setting of the Village

- 6.51 The village of Chesterton lies a short distance to the east of the appeal site. Despite Bicester's recent growth, the village retains a strong rural context in both physical and visual terms. Development on the site as proposed would introduce significant urbanisation of the site and exert strong urbanising influences upon the adjacent landscape which in itself contributes to the rural setting of Chesterton. The scheme in such close proximity would, as a result, harm the rural setting of this village.
- 6.52 Considering Mr Cook's conclusions above, I too conclude that the proposals are contrary to the Development Plan and specifically policies ESD13 and ESD15, and saved policies C8 and C28, moreover, it is contrary to the Framework at paragraph 170.
- 6.53 The overall landscape effects of the proposals would be significant and amount to substantial harm that would weigh against the grant of permission.

Loss of Golfing Facilities

- 6.54 The Council's first reason for refusal states that:

"The proposed development by reason of its location would result in the loss of an 18-hole golf when the Local Planning Authority's evidence indicates the course is not surplus to requirements and there is a need for more provision for golf courses in the Bicester sub-area over the plan period. The evidence and proposals for alternative sports and recreation provision included with the application is not considered sufficient to make the loss of the golf course acceptable."

- 6.55 The loss of sporting facilities of any kind reduces opportunities for improved health and wellbeing and active engagement in sport, which is inappropriate in an area which would have a deficit – in golfing facilities in particular - if the development is allowed to go ahead.
- 6.56 The Framework, at paragraph 97 states that:

“Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or*
- b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or*
- c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.*

6.57 Furthermore, Policy BCS10 of the Cherwell District Local Plan states that the Council will ensure sufficient quality and quantity of open space, sport and recreation provision by protecting existing sites and enhancing current provision. It goes on to state that the Council will be guided by evidence base and will consult parish councils together with potential users to ensure the provision meets local needs.

6.58 The accompanying text to Local Plan policy BCS10, at paragraph B.157, confirms that:

“responsibility for provision of open space and recreation facilities in the district is shared between the councils, private sports clubs (such as Bicester hotel golf and spa) and associations and requires partnership working.”

6.59 Paragraph B.158 continues:

“The Districts PPG17 Open Space Sport and Recreational Facilities Needs Assessment, Audit and Strategy 2006 and the subsequent Green Spaces and Playing Pitch Strategies 2008... highlighted the need to protect all sites identified in the audit to ensure an adequate supply of open space provision.”

6.60 Chesterton golf course is in the Green Spaces Strategy 2008 [CD 10-5] and is identified for protection. PAW is of the view that this demonstrates the continued need for the facility contrary to the assertions of the appellant.

6.61 Furthermore, the Green Space Strategy – Background Document (July 2008) [CD 10-6] was used as part of the leisure evidence base to inform the policies relating to open spaces and recreation for the Cherwell Local Plan Part 1. It identifies at point 7.26 an action plan for the current and future need of Golf Courses in the Cherwell Area. It identifies that there is a shortfall of 1 course, and that the action plan should ‘encourage a club/commercial operator to

provide one additional course in the Chesterton area'. This document shows also that Chesterton golf course is used to offset the deficit of golfing in the surrounding areas.

6.62 The Green Space Strategy 2008 [CD 10-5] reports:

- At page 12: "local consultation suggests that there is a need for more facilities with 53% stating that current provision is inadequate."
- At page 23 of green space strategy it also states that CDC should consider the provision of an additional course in the Chesterton Area.

6.63 The CDC Open Space, Sport and Recreation Assessment and Strategies Part 2 Sports facilities strategy executive summary in august 2018 [CD 7-2], which was published in the evidence base for Local Plan part 1 partial review' also reports:

- The existing golf course sites should be protected, unless the tests set out in the Framework are met (Point 11.15)
- Current forecast long term need is for additional provision by 2031 in the Bicester sub area of: 1x 18-hole course or 2x 9 hole courses, 8 driving range bays. (Point 11.18)
- Modelling future growth based on membership – "In the Bicester sub area, there is already a slight shortfall of provision, but this will increase in the period up to 2031 at a level which will mean that a new golf club is very likely to be required with a standard course(s) and driving ranges. Alternatively, the existing clubs may also wish to expand, potentially with new shorter courses and/or new forms of the game." (Point 11.44)

6.64 At **Annex B** of this proof is a report produced by Chesterton Parish Council which considers the likely effects of the proposals on the golf club and golfers in the local area. This report specifically considers how 18-hole golf course users would have to travel further afield, which would represent a further unsustainable result of the proposals and increase in car usage.

6.65 The proposals are contrary to the Development Plan and specifically policy BCS10. They are also contrary to the Framework at paragraph 97.

6.66 While I acknowledge that 9-holes are to be retained, the loss of a full 18-hole course is a harmful effect of the proposals. The value and usability of the subsequent provision is unclear. In this regard, I would give moderate weight to the conflict with the development plan, but it still weighs against the grant of permission.

Drainage and Surface Water Flooding

6.67 The Council's fifth reason for refusal states that:

The submitted drainage information is inadequate due to contradictions in the calculations and methodology, lack of robust justification for the use of tanking and buried attenuation in place of preferred SuDS and surface management, and therefore fails to provide sufficient and coherent information to demonstrate that the proposal is acceptable in terms of flood risk and drainage.

6.68 I am aware that there are ongoing discussions between the appellant and the Lead Local Flood Authority (Oxfordshire County Council). However, at the time of writing, there remains a gap in the appellant's evidence. Without an appropriate and agreed flooding and surface water management plan, there is no understanding of the surface water flood risk, and specifically the downstream and offsite effects, which the proposals pose.

6.69 The Framework at paragraph 155 states:

"Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas of the highest risk, they should consider the cumulative impacts in or affecting local areas susceptible to flooding."

6.70 Policy ESD 1 of the Local Plan seeks (with my emphasis):

"The incorporation of suitable adaptation measures in new development to ensure that development is more resilient to climate change impacts will include consideration of the following:

- *Taking into account the known physical and environmental constraints when identifying locations for development*
- *Demonstration of design approaches that are resilient to climate change impacts including the use of passive solar design for heating and cooling*
- *Minimising the risk of flooding and making use of sustainable drainage methods, and*
- *Reducing the effects of development on the microclimate (through the provision of green infrastructure including open space and water, planting, and green roofs)."*

6.71 In order to achieve this aim, Cherwell District Council also has policy ESD6 in the Local Plan which confirms that:

“Site specific flood risk assessments will be required to accompany development proposals in the following situations:

- *All development proposals located in flood zones 2 or 3*
- *Development proposals of 1 hectare or more located in flood zone 1*
- *Development sites located in an area known to have experienced flooding problems Development sites located within 9m of any watercourses.*

Flood risk assessments should assess all sources of flood risk and demonstrate that:

- *There will be no increase in surface water discharge rates or volumes during storm events up to and including the 1 in 100 year storm event with an allowance for climate change (the design storm event)*
- *Developments will not flood from surface water up to and including the design storm event or any surface water flooding beyond the 1 in 30-year storm event, up to and including the design storm event will be safely contained on site.”*

6.72 Policy ESD7 of the Local Plan also stipulates that:

“All development will be required to use sustainable drainage systems (SuDS) for the management of surface water run-off.”

6.73 I highlight correspondence between the Lead Local Flood Authority (Oxfordshire County Council) and appellants (dated 18 February 2020) in which it states:

“Discharge via ditched to Wendlebury Brook. Discharge to be in third party land to the south of the proposed site”.

6.74 The appellant’s drainage proposals – such as they exist – are site specific and the mitigation works proposed by the appellant will not address the flooding risk to both Little Chesterton and Wendlebury.

6.75 The introduction of significant amounts of hard standing and built form to an area will increase the amount and speed of water runoff. The applicant might be able to manage the effects of this run off on its own site, and the inclusion of attenuation ponds in the proposals is welcomed. There is insufficient consideration of the impact on the Wendlebury Brook and the village of

Wendlebury which is a short distance down-stream. Wendlebury has been the unfortunate focus of recent flood events.

6.76 In the absence of a fully agreed flood mitigation strategy, and certainly nothing that seeks to manage the effects of surface water runoff into Wendlebury Brook there is a conflict with the Development Plan and specifically policies ESD1, ESD6 and ESD7, and moreover, it is contrary to the Framework at paragraph 155.

6.77 I acknowledge that an agreement can be reached between the appellant, the Lead Local Flood Authority and the Planning Authority in this matter and this could resolve the conflict with the development plan. So, whilst this is an acute issue and requires a secured and specific remediation action, I would give moderate weight to the conflict with the development plan here, but it would still weigh against the grant of permission.

Biodiversity

6.78 I note that Biodiversity is not a reason for refusal in this case. However, as the appellant has failed to adequately set out how the development can be mitigated to avoid adverse impacts on biodiversity, this raises matters of compliance with national and Local Planning policies that are material to consideration of this appeal.

6.79 The Framework, at paragraph 170, explains that:

“Planning policies and decisions should contribute to and enhance the natural and local environment by:

...

d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;”

6.80 At paragraph 175 of the Framework, it goes on to state that:

“When determining planning applications, Local Planning authorities should apply the following principles:

a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused”.

6.81 Policy ESD10 of the Local Plan states:

“Protection and enhancement of biodiversity and the natural environment will be achieved by the following:

- *In considering proposals for development, a net gain in biodiversity will be sought by protecting, managing, enhancing and extending existing resources, and by creating new resources.*

...

- *If significant harm resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or as a last resort, compensated for, then development will not be permitted.”*

- 6.82 The appellant has prepared a Biodiversity Net Gain Assessment report⁴ ('BNG report') which presents a calculation of the number of biodiversity units applicable to the existing baseline situation and compares these against what it claims can be achieved via the Great Wolf redevelopment proposals (by reference to the submitted landscaping plans). The claim is that the proposals will deliver an overall Biodiversity Impact Score of +15.13% - i.e. an approximate 15% net gain in biodiversity.
- 6.83 The detailed breakdown of the biodiversity metric calculations is not transparent in the appellant's BNG report. However, the appellant did subsequently provide the 'raw' metric calculations to Cherwell District Council's Ecology Officer, on request.⁵ An interactive version (i.e. as populated by the appellant) was not provided.
- 6.84 The baseline assessment of the site appears to artificially depress the value of the existing habitats resulting in skewed inputs to the biodiversity calculator submitted by the Appellants to demonstrate net gain. The outputs from the calculator are then further skewed by committing to highly ambitious to the point of unrealistic habitat creation proposals, the delivery of which presents significant technical and future management challenges which are neither acknowledged nor addressed.
- 6.85 The compounding effect of these two sources of bias is to suppress the impact significance of habitat losses occasioned by the proposals while exaggerating the positive effects. There also appear to be fundamental numerical errors and oversights in the Appellant's use of the calculators. Full independent correction of these errors is currently hampered by an absence of transparency in the Appellant's submitted material.
- 6.86 Dominic Woodfield has produced a commentary on the appellant's Net Gain Assessment, which concludes that:

⁴ WSP (December 2019). Great Wolf Resorts: Biodiversity Net Gain Assessment Report. [CD 2-1]

⁵ WSP (28 February 2020). Great Wolf Resort, Bicester: WSP Responses to comments from CDC Ecology Officer 05 February 2020.

- If the Warwickshire metric incumbent at the time of the submission of the application is applied using the appellant's area figures (as taken from their 28 February letter to CDC), and correcting back to the defaults in the metric (in respect of condition, distinctiveness and the ease of creation of proposed habitats), then <10% net gain is indicated.
- If the metric is further amended to correct for base errors in habitat classification, then net loss of biodiversity is indicated (i.e. -5% or greater).
- If the metric is further amended to ensure more practically realistic condition targets and/or timescales to delivery are adopted for proposed new or enhanced habitats, significant net loss is indicated.
- If the calculations are re-run through the more up to date Defra 2.0 metric, then net loss is indicated even without any substantive correction of the appellant's figures.

6.87 The proposals are contrary to the Development Plan and specifically policy ESD10. They are also contrary to the paragraphs 170 and 175 in the Framework.

6.88 The appellant has failed to demonstrate a net gain in biodiversity and by reviewing the assessment metrics a net loss can be identified. This is a significant and harmful effect of the proposals. I would give substantial weight to the conflict with the development plan and the Framework here that weigh further against the grant of permission.

7.0 CONCLUSIONS AND PLANNING BALANCE

7.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that proposals be determined in accordance with the development plan unless material considerations indicate otherwise.

7.2 The site is not allocated for development in the Development Plan; to the contrary it is protected for its sporting provision.

7.3 The proposals are at significant scale and should be considered through the development plan process. No attempt has been made to engage with the plan led, Local Plan making process.

The Need for the Development

Employment Need

7.4 It is stated in paragraph B.44 of the Local Plan Part 1 that:

“to ensure employment is located in sustainable locations, to avoid problems such as traffic on rural roads and commuting, employment development in the rural areas will be limited”.

7.5 This is then linked to the Local Plan strategy of focusing new housing development at Banbury and Bicester, making clear its intention to seek the sustainable colocation of housing and employment. Given the relative distance of the appeal site to the homes both existing and proposed in Bicester – especially when compared with other employment opportunities and mixed developments – this proposal is not in conformity with this general strategy.

7.6 Moreover, paragraph B.46 of the Local Plan Part 1 states that:

“the new allocated employment sites in Banbury and Bicester, along with existing employment sites are considered to ensure a sufficient employment land supply”.

7.7 This can be seen to confirm that there is not a significant need for the Great Wolf lodge Resort as a contribution to the CDC employment land supply.

7.8 In the Economic Statement which supported the original application, the appellant has attempted to demonstrate how the proposals are consistent with the Oxfordshire Local Industrial Strategy (LIS). Reference is made to providing jobs for young and old and to increase the skills of the local community by providing opportunities for life-guard training. These are laudable arguments but not demonstrably an addition to opportunities that already exist both locally in Bicester and across Oxfordshire. The case studies that are included in the Economic Statement also include examples of career paths that can be followed once one has a job at a Great Wolf Resort, and again these appear impressive but are similar to others that can be gained in the leisure and hospitality sectors (including in locations across Oxfordshire). It is also unclear how these claims fit with the explicit ambition of the LIS, which is as follows (taken from its explanatory overview):

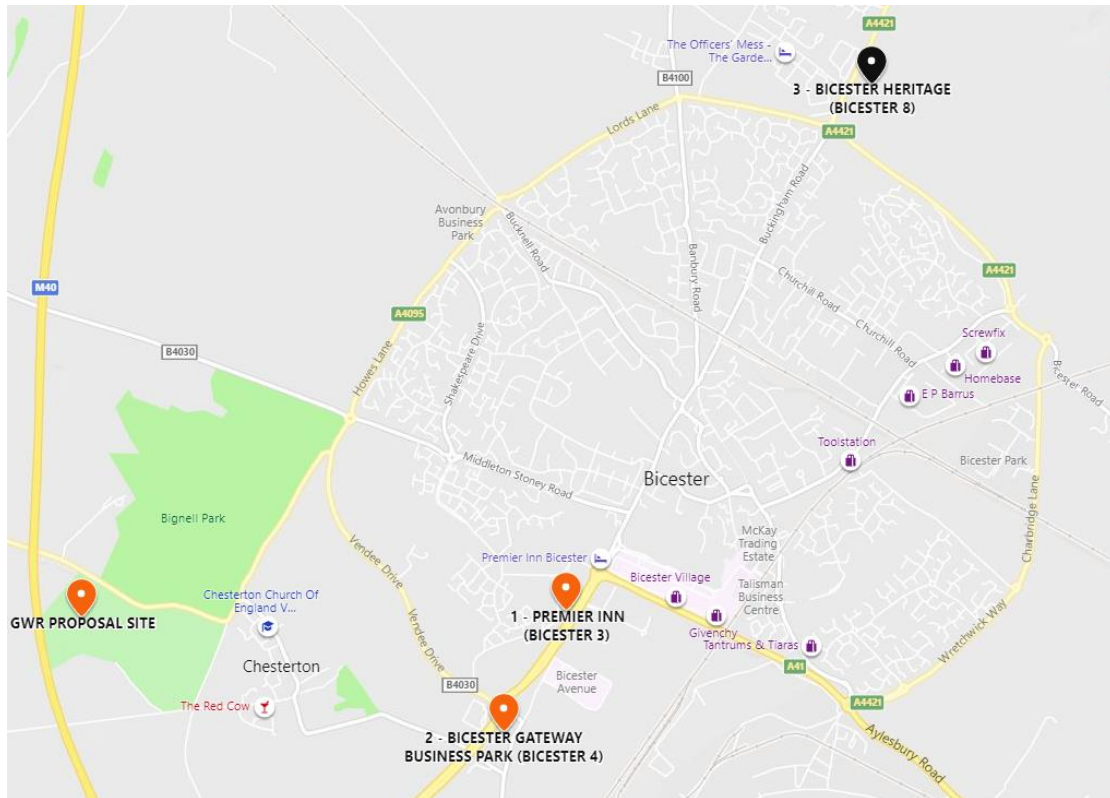
“Our ambition for the Oxfordshire Local Industrial Strategy is to position the county as one of the top three global innovation ecosystems, highlighting our world-leading science and technology cluster and to be a pioneer for the UK and our emerging transformative technologies and sectors.”

Identified Hotel Need by Cherwell District Council

7.9 Cherwell District Council has identified three strategic areas which are expected to have hotels included as part of its leisure provision in Bicester. This will meet the demand for overnight stays as expressed in Policy SLE3. These hotels have been identified in appropriate sustainable areas that are allocated for growth in Bicester.

- 7.10 In the accompanying text for Policy Bicester 3, South West Bicester Phase 2, it states that Phase 1 of the urban extension (known as Kingsmere) is already under construction, including a hotel. The hotel at this strategic area has now been completed and is a Premier Inn. The Premier Inn was granted planning permission for 80 bedrooms on 4/05/2012 (12/00063/REM of 06/00967/OUT) and a 56-bedroom extension was granted on 21/12/2018 (18/01208/F). The premier inn is now a 136-bed hotel.
- 7.11 Policy Bicester 4, Bicester Business Park, includes a 149-bed hotel as part of its already approved planning permission (16/02586/OUT and 17/02557/REM). Full implementation of this scheme requires the completion of Junction 9 improvements, of which both Cherwell District Council and Oxfordshire County Council are both supportive. Oxfordshire County Council has already agreed the junction improvements to allow this site to be developed.
- 7.12 Policy Bicester 8, Former RAF Bicester, includes the provision of a hotel – “the development of hotel and conference facilities will also be supported as part of a wider package of employment uses”. An application at this site for a 344-bed hotel has already been submitted by Bicester Heritage Ltd in July 2018 (18/01253/F) and was granted consent on 11/03/2020.
- 7.13 The combined total of hotel rooms that would/could be provided in these three strategic areas is 629 rooms. Details of their applications can be seen in the table and map below.

Map	Reference	Address	Proposal	Validation Date	Status
1	12/00063/REM	Premier Inn Kelso Road Bicester OX26 1AN	80-bedroom hotel	03/02/2012	Approved 04/05/2012
	18/01208/F		56-bedroom extension	09/07/2018	Approved 21/12/2018
2	17/02557/REM	Bicester Business Park Wendlebury Road Chesterton Bicester OX25 2BX	149-bedroom hotel	19/12/2017	Approved 28/03/2018
3	18/01253/F	Bicester Heritage Ltd	344-bedroom hotel	17/07/2018	Approved 11/03/2020



7.14 Furthermore, in Bicester town centre, the Travelodge Hotel has recently extended to provide 18 additional bedrooms (ref 17/01792/F).

7.15 There are also additional hotels that are identified in Local Plan policy for the wider Cherwell Area and the associated strategic development areas:

- Policy Banbury 8: Bolton Road Development Area (SPD currently being made, no active planning permissions)
- Policy Banbury 9: Spiceball Development Area (Ref 13/01601/OUT approved on 7/10/2016 to include a 92-bed hotel)
- Policy Villages 5: Former RAF Upper Heyford (Ref 16/01000/F approved on 3/11/2016 to include 16 bedrooms)

7.16 These recent permissions, and allocations, are in addition to a range of hotel facilities in Bicester, and around Chesterton. This demonstrates therefore that the needs for hotel beds has been more than met.

7.17 The addition of the proposed unallocated 498-bedroom Great Wolf Lodge Resort is expected to host on average 500,000 visitors per annum. This could potentially undermine the delivery of hotels and indeed the wider development allocations of the Local Plan (i.e., if conditions requiring hotels cannot be discharged – because they are no longer viable – then the developer of new homes and genuinely sustainable development is put at significant risk).

Conference Facility Need

- 7.18 In the application or appeal documentation I cannot find any justification or evidence of need for this element of the proposals. 550sqm GIA of conference space at a dedicated conference centre is included in the scheme but the Local Plan Part 1 only includes conference facilities in one of its policies (Policy Bicester 8: Former RAF Bicester) as a reflection of the lack of need. The conferencing facilities at this strategic location have not yet been built out but planning application 18/01253/F including conferencing facilities at this location now has consent.
- 7.19 The addition of the proposed unallocated conferencing facilities at the Great Wolf Lodge Resort is expected to contribute to the resorts average of 500,000 visitors per annum. This, as with the hotel bed provision, has the potential to undermine the Local Plan's aspirations and allocations. The provision on the appeal site could potentially reduce visitor numbers at the allocated conferencing facilities within the strategic area of the Local Plan at Former RAF Bicester. The conferencing facilities at Former RAF Bicester have not yet been built and as a result their popularity and viability are yet to be established.
- 7.20 Bicester Hotel Golf and Spa currently provides a range of flexible conferencing facilities, with the maximum number of delegates being able to attend at any one time being 200. The proposed conferencing facilities at the Great Wolf Lodge Resort would be in direct competition to those adjacent, potentially create an adverse economic impact to the local and wider economy of Cherwell.

Location and Sequential Choice

- 7.21 In an attempt to demonstrate that the proposed location is appropriate and that the impacts of delivering the scheme will be sustainable and of social and economic benefit to Cherwell, the appellant undertook a sequential test, details of which were included with the application documentation. A review of the sequential test reveals that the 'town centre first' approach has been – to an extent – set aside. This is explained in the Planning Statement by the need to consider the "*particular market and locational requirements*" for the proposals. Whilst this follows the text of the Planning Practice Guidance (PPG), it misses the main emphasis of the guidance, which is that main town centre uses should remain, as first preference, a town centre use. The same paragraph of the PPG (ID: 2b-012-10190722) goes on to explain that in such cases "*robust justification will need to be provided*", which is not the case with the appeal proposal. Instead, the requirements are listed as being:
- Located 90 minutes' drive time from London and Birmingham

- Approximately 12ha (this being the built part of the Site) with a relatively level topography Reasonably well concealed with no nearby sensitive receptors
- Proximity to and ability to connect to public transport infrastructure
- Main road proximity and visibility and ease of access
- M40 corridor location
- Proximity (within 30 minutes' drive time) to population of 30,000 plus providing local workforce

7.22 This list of requirements is not accompanied by any identified need for the proposals or explanation as to how this 'wish list' has had any regard to the local or indeed national planning context. As outlined above, the Local Plan sets out how and where employment and leisure provision will be delivered in sustainable locations. The appeal scheme fails to properly engage with this requirement.

7.23 Moreover, a review of the Great Wolf Resorts annual reports⁶ reveals (on page 14) the development criteria for new projects:

“Development Criteria

We choose or suggest sites for the development of new resorts by considering a number of factors. Those factors can include:

Large target customer base. We select or suggest development sites that generally have a minimum of five million target customers within a convenient driving distance. Because we offer an affordable vacation experience, we appeal to families in a variety of income ranges.

Recognized tourist destination. We may focus on drive-to destinations that attract a large number of tourists, including both emerging and traditional family vacation markets. We believe we can charge premium rates in these markets due to the high quality of our resorts and our family-oriented amenities and activities. In addition, the indoor nature of many of our amenities and activities allows us to reduce the impact of seasonality that may negatively affect other attractions in these areas. These areas also often have active and effective local visitors and convention bureaus that complement our marketing and advertising efforts at little or no cost to us.

⁶ <https://sec.report/Document/0001193125-13-134650/d456266d10k.htm>

Highly visible and large sites. We generally develop or suggest developing resorts in highly visible locations along major roadways. Visibility from highways enhances easy drive-to access, provides marketing benefits due to high volumes of traffic and often produces synergies from adjacent land uses or complementary developments. We generally choose or suggest sites that have enough acreage to allow for potential expansions and future sales of out-lots.”

- 7.24 The “*specific requirements*” and indeed the “*Development criteria*” both omit and go against the identification of a sustainable location (a large site with “reasonable” connections linked to road systems with a workforce that lives up to 30 mins away), except with regard to the identification of accessible public transport which (perhaps ironically) is not actually available at the proposed site and has resulted in the inclusion of the shuttle bus. As explained above, and in Mr Lyons evidence, there is no convincing argument put forward by the appellant that the shuttle bus, given its limited timetable and sphere of influence and that most visitors to the resort will travel from some distance, is likely to be effective.
- 7.25 Turning to those sites that were considered through the sequential test; first there is a seemingly random selection of towns included at a radius of some 120 minutes from London, the premise for which is a flexing of the applicant’s desires. There is no robust planning reason for considering this or suggesting this approach. Following this listing of towns there is then a trawling of large sites. Several sites are listed as not available because they have some form of allocation or consent for a different use (usually housing) and this raises the question as to why they were then included in the list at all, or why more reasonable alternatives were not included. It would be a simple assessment that as a first step filtered out sites that were consented for different uses and then as a ‘stage two’ looked more closely at available sites.
- 7.26 At Bicester specifically, strategic site allocations of the Local Plan are considered but of the three listed at my paragraph 13.14 above, which specifically *include* a hotel provision, one is missed and the other two are suggested to be unsuitable. This is an illogical conclusion, given their explicit allocation for such uses and just because they have some form of consent, does not mean that all the reserved matters or conditions that relate to a hotel have been extinguished. There could exist some form of commercial agreement to include a Great Wolf Resort within the allocated sites. Also, as explained above, the very fact that there are allocated hotel developments around Bicester means that any new applications risks undermining what is planned.
- 7.27 Additionally, the ‘front nine’ holes of the Chesterton golf course has not been included in the sequential assessment. This would appear to be an odd decision given that it has an existing access point, has some built form and

would be a more reasonable and logical alternative to a number of those that are included in Appendix 3 of the planning statement.

Adverse Impacts of Scheme

7.28 As this proof has demonstrated, the proposals have the potential to adversely impact sustainability, generally; highways; local landscape and character; participation in sport (specifically golf); water management; and biodiversity.

7.29 Contrary to the appellant's assertions the proposal would cause harms of **significant weight** as follows:

- Its unsustainable location causing an increase in the reliance on the private car
- severe impact on highway capacity and safety
- to the landscape and character of the local area; and
- a net loss in biodiversity

7.30 Moreover, the proposals will result in loss of golfing facilities, and there are significant uncertainties about service water management, matters which will also carry **moderate weight**.

Alleged Benefits of the Scheme

7.31 It is accepted that development will bring with it some benefits which are economic and social.

Proposed Economic Benefits

7.32 The appellant claims that the proposals will bring:

- *“Significant direct investment in Cherwell of £200 million, reinforcing its position as an open and growing district and acting as a positive catalyst for future investment and development, particularly in the tourist sector*
- *Creation of significant additional local spin-off jobs and wider economic benefits created through demand for local goods and services in the area associated with increased visitor numbers and £4.9 million of additional spend per year to the area*
- *Securing a viable future for the BHGS golf club and its members, including investment in the existing course and creation of a golf scholarship programme for young people local*

- *Generation of substantial business rates contributions, for local and regional benefit.”*

7.33 Chapter 5 of the Environment Statement is the socio-economic assessment of the proposals. At paragraph 5.3.29 proposed visitor spend is summarised as follows:

- *Visitors to the Proposed Development spend the same proportion of their total expenditure on accommodation, shopping, food and drink, and attractions as staying visitors;*
- *The average room rate at the Proposed Development is 41% of visitors’ total spend, which is the total of accommodation and attraction spend for staying visitors in Oxfordshire. This conservatively assumes that all of visitors’ expenditure on attractions would be within the Proposed Development. After travel expenditure (which is assumed to be fully absorbed by the transport providers), the remaining 43% would therefore be spent on shopping and food and drink;*
- *A high proportion of the food and drink and shopping spend would also take place in the Proposed Development. However, there are some opportunities for local retail and food and beverage spend outside the Proposed Development, particularly in Bicester Village. It is conservatively assumed that 25% of total spend on food & drink and shopping is spent outside the Proposed Development in the rest of Oxfordshire; and*
- *There will be a high proportion of children visiting the Proposed Development and whilst these will support expenditure in Oxfordshire, they will not be expected to do so directly. This analysis therefore only accounts for spending of adult visitors, which, based on likely attendance, is expected to be approximately half of visitors.*

7.34 The summary appears to suggest that the majority of the spend by visitors and staying guests will be retained within the resort. This is, after all, the business model which is described elsewhere through the application and supporting documentation. Moreover, the off-site spend is suggested to be most likely focussed at ‘Bicester Village’ which is a destination in its own right at Bicester (and in Oxfordshire) that brings some limited benefits to the surrounding area but is not a large generator of local economic growth.

7.35 At best, it appears that a quarter of the overall spend might be in the local area, but once people arrive at the resort it is unlikely that they will be enticed beyond the front gates because everything is on site. Moreover, the unsustainable nature of the location means anyone will have to travel by car, quite some distance, to find a food offer or indeed visit ‘Bicester Village’.

- 7.36 The claim that the Great Wolf Lodge Resort will create “£4.9 million of additional spend per year to the area” is not strongly substantiated. As explained above, the Great Wolf Lodge Resort will encompass a large number of food and beverage outlets, as well as various recreational activities. As a result, the majority of spending will be internal as ‘everything is under one roof’. The economic statement (prepared by Volterra) states that the Great Wolf Lodge Resort visitors are expected to spend £4.9 million per year on food and beverage and retail across Oxfordshire. Point 4.17 of the economic statement clarifies that this amount assumed that 25% of the total spend on food and drink being outside of the proposed development.
- 7.37 I am unconvinced that a resort which provides the range of dining facilities as proposed would also provide a compelling reason for visitors to leave and spend their money outside its gates. Furthermore, those that do leave are likely to do so by private car given the closest alternative eating options are at some distance, so again, this undermines the sustainable location arguments for the proposal. On this point I note also that the transport assessment that is submitted alongside the proposals does not appear to include traffic movements for visitors leaving temporarily to find food in the local area.
- 7.38 The nature of hotel employment is that it is necessarily seasonal, and staff are generally lowly paid. 4.13 of the economic statement identifies that workers are expected to spend an estimated £157,000 per year in the local area. 4.14 continues: “due to lack of relative spending options within close proximity of the site, it is likely that many workers will have their lunch at the proposed development or bring lunch from home.” Indeed, Chesterton has two options – the Red Cow pub or the brasserie at the Chesterton Hotel – and there is no local shop. Once more, if staff do choose to go to a shop for lunch it will be in Bicester which means more vehicle trips.
- 7.39 Furthermore 42% of the jobs are targeted at those under the age of 21 (lifeguard and hospitality training). The wages for this are likely to be limited and represent a limit on the spending power.
- 7.40 The employment of construction staff is likely to be a short term social and economic benefit. Spending is based on the assumption that 60% of workers will spend £10.32 a day for 220 days a year. However, a ‘Yougov’ survey found that workers spent £6 average in local area on average in 2005, this has been uplifted to reflect earnings growth and then a 50% leakage applied to total spend to account for lack of options at the site and current lack of transport. As with the hotel staff considered above, the direct local return seems limited and certainly there will be very few benefits to Chesterton locally during construction regarding worker spending. Moreover, this is not a significant or unique benefit of this proposal. Development jobs – and the limited associated spending – will be generated by all development proposals in and around the local area, and across Cherwell.

- 7.41 The arguments that the appellant present in terms of the supply chain for the proposals are not convincing. There is limited evidence that this will be sourced locally. It is likely that a corporate chain like Great Wolf Resorts will have a branded catalogue which ensures that products and supplies are kept within a company or often shipped in with minimal positive impact for local providers. Moreover, the fact that the proposal is to include laundry facilities and other 'back of house' functions within the site will prevent other opportunities for local supplies to engage with the new resort.
- 7.42 Finally, the generation of business rates is suggested as a potential benefit of the scheme. However, it is considered that contributions for local and regional benefit is not likely to be sufficient to outweigh the harm into landscape and the local highway network. This benefit is a general benefit of most commercial development and is of limited weight in a single case. This must also be balanced against the potential that business rates could be lost through increased hotel or conference competition where no increase need has been identified and at the golf course and spa for example due to closure of half of the golf course and reduction in conference facility use.
- 7.43 Therefore, only **moderate weight** can be afforded to these arguments in favour of the proposals.

Proposed Social Benefits

- 7.44 The appellant claims that the proposals will bring:
- Provision of an exciting new family leisure resort, waterpark and hotel designed for young families, complementing the existing offer in the area.
 - Provision of discounted day passes, designed to support local families in the wider Bicester area, including additional sustainable day passes, available to those using public transport to visit the resort.
 - Delivery of new local employment opportunities, with up to 600 permanent Great Wolf Lodge jobs (460 FTEs) created with further jobs created during the construction and fit out period.
 - Supporting local young people with 42% of jobs targeted at those under the age of 21 offering full lifeguard and hospitality training.
 - Commitment to working alongside and supporting local and national charities through partnerships, employment and apprenticeship opportunities and community events.
 - Creation of a substantial new public nature trail, including educational and wayfinding material, expressly for local residents', workers' and visitors' benefit.

- Securing investment in a diverted and improved a section of Public Right of Way, increasing use and amenity compared to the existing underused and restricted route through an active golf course.
- Investment in the creation of safe and secure off-road footways and crossings in three places, along the A4095 to the west and north of Chesterton village and on Green Lane, to connect currently separate parts of the Public Right of Way network in the area.
- Delivery of a new shared pedestrian footpath / cycleway from the resort into Chesterton village aiding accessibility in the immediate area and providing a contribution to wider cycle improvements initiatives.
- Provision of free-to-use shuttle bus services for resort visitors, staff and Chesterton residents and making a £1.6 million contribution to fund public bus services to Bicester and Chesterton bus stop improvements.
- Provision of a public art contribution of £75,000 over three years to benefit the cultural well-being of the local population to support strategic public events such as the Bicester Festival and other initiatives.

7.45 The first two 'benefits' in the list above are put forward on the premise that there is need for this facility in this location. In this proof evidence I have questioned that assumption. I cannot agree therefore that the first two points are benefits.

7.46 It is accepted that the proposals will provide employment. However, the value of this employment is questioned, and would be in direct competition with positions at hotels with planning consent locally, and local leisure centres. As is discussed above, it is not clear how these jobs will fit with the economic strategy for Cherwell, or Oxfordshire, and the seasonal nature of them also undermines their benefit.

7.47 The remaining 'benefits' are necessary mitigation to make the proposals acceptable in planning terms and as such cannot be properly claimed to be material benefits in a planning sense.

7.48 Therefore, only **limited weight** can be afforded to these arguments in favour of the proposals.

Proposed Environmental Benefits

7.49 The appellant claims that the proposals will bring environmental benefits as follows:

- *Creation of a substantial new public nature trail, including educational and wayfinding material, expressly for local residents', workers' and visitors' benefit.*

- *Protecting and enhancing local biodiversity through extensive greening and ecological works, including securing significant biodiversity net gain.*

7.50 However, as Mr Woodfield's evidence has demonstrated, the proposals would, in fact, result in a net loss to biodiversity. Therefore, there is no benefit here and only a demonstrable harm; no weight can be given to this argument in favour of the proposal.

Conflict with the Development Plan

7.51 As described throughout this proof of evidence, proposed development the subject of this appeal would conflict with the development plan, when considered as a whole, and specifically Local Plan policies:

BSC10: Open Space, Outdoor Sport and Recreation Provision. The site is identified as providing an important open space and sporting provision in the Local Plan. The loss of golf facilities in an area of deficit is a clear contradiction to the plan, but some re-provision is proposed. This breach affords **moderate** weight.

SLE1: Employment Development. The site is in the open countryside and it is in an unsustainable location. This breach affords **significant** weight.

SLE2: Securing Dynamic Town Centres. The appellant has undertaken a sequential test, but this has limited reference to the effects of the centres of Bicester. The proposals are not strictly 'main town centre' use, but will have an effect on the planned provision of hotels locally. This breach affords **limited** weight.

SLE3: Supporting Tourism Growth. The proposal is in an unsustainable location, and risks undermining the locally planned tourist strategy as articulated through hotel development allocations.. This breach affords **significant** weight.

SLE4: Improved Transport and Connections. The unsustainable nature of the site's location coupled with its limited and inefficient public transit and other sustainable travel options, included those proposed do not alleviate the situation. This breach affords **significant** weight.

ESD1: Mitigating and Adapting to Climate Change. The proposed development would not reduce the need to travel and would not encourage sustainable travel options including walking, cycling and public transport. This would not reduce dependence on private cars. This breach affords **significant** weight.

- ESD 6: Sustainable Flood Risk Management.** In the absence of a fully agreed flood mitigation strategy, and certainly nothing that seeks to manage the effects of surface water runoff into Wendlebury Brook there is a clear conflict with this policy. However, I am aware that this not necessarily an insurmountable challenge. This breach affords **limited** weight.
- ESD 7: Sustainable Drainage Systems (SuDS).** As above, in the absence of a fully agreed flood mitigation strategy, and certainly nothing that seeks to manage the effects of surface water runoff into Wendlebury Brook there is a clear conflict with this policy. However, I am aware that this not necessarily an insurmountable challenge. This breach affords **limited** weight.
- ESD13: Local Landscape Protection and Enhancement.** The effects of the proposals will have an unacceptable detrimental bearing upon the rural setting of the village of Carterton as well as the amenities enjoyed by the users of public rights of way and highways in the locality. This breach affords **significant** weight.
- ESD15: The Character of the Built and Historic Environment.** Chesterton retains a strong rural context in both physical and visual terms. The proposals would introduce significant urbanisation of the site and exert strong urbanising influences upon the adjacent landscape which in itself contributes to the rural setting of Chesterton, and its Conservation Area. This breach affords **significant** weight.
- T5: Proposals for new hotels, motels, guesthouses and restaurants in the countryside.** The nature of the proposed development is not compatible with the size and character of its location and there are adverse environmental, and transportation affects resulting from the proposal. Therefore, this breach affords **significant** weight.
- TR7: Development attracting traffic on minor roads.** The proposals will regularly attract large numbers of cars onto unsuitable minor roads, and thus is entirely contrary to this policy. Therefore, this breach affords **significant** weight.
- C8: Sporadic development in the open countryside.** The proposed development would be in the open countryside and would be entirely detrimental to its attractive, open, and rural character and thus is entirely contrary to this policy. Therefore, this breach affords **significant** weight.
- C28: Layout, design and external appearance of new development.** The layout, design and external appearance, of the proposals are not

sympathetic to the character of rural context of that development. This breach affords **significant** weight.

National Policy

- 7.52 The proposals are at odds with paragraphs 8, 11, 83, 84, 89, 90, 98, 103, 148, 149, 155 and 170 in the Framework.

Conclusion

- 7.53 Having regard to the foregoing, my considered view is that the balance in this case lies squarely with a decision to dismiss this appeal.

ANNEX A: STEVEN SENSECALL – CURRICULUM VITAE



Steven Sensecall MRTPI

Partner

Oxford

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Steven is Head of Carter Jonas' Planning & Development team in the south and south-west having joined in May 2017 as part of the acquisition of Kemp & Kemp. He leads a team of 20 planning and development professionals working for a wide variety of public and private sector clients for whom the firm provides planning and development consultancy services on a national basis. Steven is an equity partner and the Oxford 'Head of Office'. He is also a member of the firm's Planning & Development Board.

Steven appears regularly at Planning Inquiries and Development Plan Examinations in Public as both an advocate and expert witness. He is also a frequent speaker on planning matters.

Primary Skills

- Site-wide masterplans
- Securing planning permissions
- Development plans
- Expert Witness

Examples of Experience

- Led the professional team appointed by the landowners and a promoter to secure a housing allocation and outline planning permission for 1,500 new homes and associated infrastructure on land at Crab Hill, Wantage in Oxfordshire.
 - Acting for Berkeley Strategic in the promotion of land at Broadwater Farm, Tonbridge & Malling for circa 900 new homes and leading the professional team currently preparing an outline planning application consistent with a draft Local Plan allocation.
 - Secured an allocation on Green Belt land in the South Oxfordshire Local Plan 2035 for circa 3,500 new homes with associated services and infrastructure, including improvements to the rail network. Now heading up the professional team instructed to prepare and submit an outline planning application pursuant to the allocation.
 - Promoting land for inclusion in emerging Local Plans in Wiltshire, North Somerset, Staffordshire, Oxfordshire and Dorset for circa 6,000 new homes and new employment-generating development.
 - Acted for Berkeley Homes (Oxford & Chiltern) Limited and leading the professional team in securing permission in respect of a hybrid application (part outline, part detailed) for 750 homes on land at Warfield near Bracknell.
-

- Acted as lead consultant in securing outline planning permission on behalf of Lands Improvement Holdings Ltd for a scheme for 550 homes and a 23-hectare business park on land at Oteley Road South, Shrewsbury.
 - Secured on allocation in the St Edmundsbury Plan for circa 1,300 new homes on land at Bury St Edmunds in Suffolk. Now leading the professional team in seeking a hybrid permission pursuant to that allocation.
 - Advising a large US corporation on proposals for new data centres across the UK.
 - Acting for Herford College and the University of Oxford on a scheme for graduate accommodation and academic space.
 - Retained for over 25 years by the United Kingdom Atomic Energy Authority (“UKAEA”) and then by Harwell Campus Partnership to deal with all planning and development matters relating to Harwell, Oxford. Notable successes include:
 - Co-authorship of *Laying the Foundations*, which set out the blueprint for the redevelopment of the Harwell Oxford Campus
 - Securing a site-wide employment and housing allocation in the Vale of White Horse Local Plan
 - Securing detailed planning permission for over 50,000 square metres of new science and technology related development
 - Securing detailed planning permission for Diamond Synchrotron
 - Securing detailed planning permission for the Vaccines Manufacturing and Innovation Centre
 - Retained for over 25 years by the UKAEA to provide planning consultancy services in connection with Culham Science Centre (CSC). Notable successes include:
 - Securing the removal of CSC from the Green Belt and the allocation of the site in the SODC Local Plan 2035 as a strategic employment site
 - Renewing/extending the Joint European Torus temporary permissions to allow the continued operation of that facility.
 - Working up and agreeing a Masterplan Framework for the CSC as a whole and agreeing the same with officers from SODC as the basis for a Supplementary Planning Document (SPD) for the site
 - Securing planning permission for 9,000 square metres of new Class B1 development
 - Securing planning permission for a new Remote Applications in Challenging Environments (RACE) building
 - Securing planning permission for a new Materials Handling Facility and the National Fusion Technology Platform
 - Appointed by Abingdon School to develop a site-wide masterplan and to handle detailed planning applications for a New Science Centre and a new Humanities building.
 - Acted for the Defence Infrastructure Organisation in the promotion through the development plan process of an army barracks (and former airfield) at Abingdon in Oxfordshire. Secured the removal of the site from the Green belt and allocation for circa 2,750 homes. Now heading up the team preparing an outline planning application.
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- Agreeing a site-wide masterplan for new development in the Green Belt at the Manor School in Oxfordshire and then securing a hybrid planning permission pursuant to the masterplan for a new sports hall, a swimming pool, new classrooms and amended parking and circulation space.
- Secured an allocation in the recently adopted Cherwell Local Plan for circa 300 new homes on land at Begbroke in Oxfordshire. Now leading the team appointed to progress an outline planning application pursuant to the allocation.
- Securing a Local Plan application for Müller UK for some 31 hectares of new employment development at Market Drayton in Shropshire and then pursuing an outline planning application for a new 1,100 sqm, 28-metre high production facility, planning permission for which was secured.
- Acting for the University of Oxford in seeking planning permission for a new £150m Humanities Building in the Radcliffe Observatory Quarter, Oxford.

Qualifications

- Member of the Royal Town Planning Institute
- Graduate Diploma Planning for Urban Conservation and Renewal
- BA (Hons) Planning Studies

Career

- 2017 to present: Equity Partner, Carter Jonas
- 1982 to 2017: Kemp & Kemp LLP

ANNEX B: PARISHES AGAINST WOLF – GOLF REPORT

Golf Report



By Parishes Against Wolf - 'PAW'

Appeal Ref: APP/C3105/W/20/3259189

January 2021

Introduction

This report has been prepared by Parishes Against Wolf 'PAW' in objection to the above mentioned planning appeal submitted by Great Wolf resorts. The report specifically relates to grounds for refusal 1 as outlined in the decision notice (19/02550/FUL), which states: -

1. The proposed development by reason of its location would result in the loss of an 18-hole golf course when the Local Planning Authority's evidence indicates the course is not surplus to requirements and there is a need for more provision for golf courses in the Bicester sub-area over the plan period. The evidence and proposals for alternative sports and recreation provision included with the application is not considered sufficient to make the loss of the golf course acceptable. The development is contrary to Policy BSC10 of the Cherwell Local Plan 2011-2031 Part 1 which seeks to protect existing sport and recreation provision and enhance the existing provision. It is also contrary to Government guidance contained within the National Planning Policy Framework.

This report has been prepared in conjunction with Members of the golf committees from the Bicester Hotel Golf and Spa (BHGS) and appended to this report is a letter written by the Chairman, Paul Brain outlining their strong objection to the appeal.

It is the view of PAW and the Members of the golf committees that the Appellant has failed to provide evidence that the traditional style 18 hole course is surplus to requirements. Bicester's population continues to grow rapidly and in fact Cherwell District is projected to grow by 34,500 from 2017-2027. It is therefore important that viable golfing facilities such as the BHGS are protected to provide an important facility for this growing population. On this basis the reason for refusal shown above still stands.

On this basis, this should be a key factor in the dismissal of the above mentioned planning appeal.

Key Documents

The following key documents are referred to in this report: -

- BGHS Golf Committee Member's letter – shown at Appendix 1
- CDC's Sports Facilities Strategy dated 2018 – "*Cherwell's Sports Facilities Strategy*" – shown at Appendix 2
- England Golf's report on golf provision in the area dated December 2020 – "*England Golf's Report*" – Shown at Appendix 3

Structure of Report

1. Context – outlining why the PAW feels the applicant has not followed the correct consultation process and evidence from BHGS's company accounts illustrating how golf demand has continued
2. Planning Policy Review – update on planning policy with focus on specific policies relating to North Oxford golf course (a course located within 20 minutes from BGHS)
3. Review of the Appellant's report (by CBRE) as part of planning application 19/02550/FUL
4. Commentary on England Golf's Report commissioned in December 2020
5. Conclusion

1. Context

The BHGS course is a key part of the local area and as stated in the Committee Members letter shown at Appendix 1, the golf course has been (and continues to be) a long standing part of the community positively contributing economically, socially and to the well-being of its members and players over the past 50 years.

The club continues to attract members and the outlook is positive for the club in light of the large number of houses being delivered in the Bicester area. Understandably prospective members and those seeking to renew were put off from doing so in light of the Great Wolf planning application in 2019 therefore seeing a drop in memberships. In 2020 however after the refusal of planning permission, the golf club saw an increase in new Members and an increase in pay-as-you-play players proving the viability of the golf club in its current form as a traditional 18 hole course.

On this basis and supporting the sentiment outlined above and information provided in Mr Brain's letter at Appendix 1, extracts from Bicester Hotel Ltd's company accounts are highlighted below with the supporting documents shown at Appendix 5.

<i>Accounts - 31.10.17</i>	<i>Accounts - 31.10.18</i>	<i>Accounts - 31.10.19</i>
Review of Business 'Golf subscriptions have followed national trend, with a decrease in the number of members, <u>however additional income from other golf segments have partially compensated for this and are expected to generate further growth in the future.</u> '	Review of Business Section it state 'Golf subscriptions have followed national trends, with continued decrease in membership numbers, <u>however additional income from another golf segments have partially compensated for this and the contribution to golf operations has increased tremendously.</u> '	Review of Business Section it states 'Golf subscriptions have followed the national trends with a continued decrease in membership numbers <u>but the contribution from golf operation has improved due to other revenue stream and greater efficiency.</u> '
		In the principal risk and uncertainties section it states when referring to the Covid pandemic 'On 23 rd March the business closed its doors and it is expected that it will remain closed untiluntiluntiluntil July 2020, <u>except Golf which was allowed to re-open and continues to thrive.</u> '

The above extracts from Bicester Hotel Ltd's accounts serve to illustrate that the golf course continues to be attractive for players new and old and remains viable. Importantly, and as seen across the country, BHGS continues to diversify the source of its income streams not relying solely on Member's fee income.

For example and as outlined in the supporting text at Appendix 1, the golf course continues to attract visitors from the website Golfbreaks.com and appears to be very popular having been

rated as being in the 'Top 10 Best golf resorts in the UK' (extract shown at Appendix 4). BHGS is in good company listed alongside 2014 Ryder Cup venue, Gleneagles and also Trump Turnberry.

On this basis, it is difficult to see what empirical evidence the appellants have to illustrate the current set up as a traditional 18 hole course is surplus to requirements. An indicator of this would be the club going into financial distress. To the contrary, golf continues to 'thrive' as per the latest set of accounts.

2. Planning Policy Review

Policy BCS10 of the Cherwell District Local Plan Part 1 states that the Council will ensure sufficient quality and quantity of open space, sport and recreation provision by protecting existing sites and enhancing current provision. It goes on to state that the Council will be guided by evidence base and will consult parish councils together with potential user to ensure the provision meets local needs.

Furthermore, the NPPF states that the access to a network of high quality open spaces and opportunities for sport and physical activity is important for health and well-being of communities and paragraph 97 of the NPPF states existing open space, sports and recreation buildings and land, should be protected unless certain aspects are met.

North Oxford Golf Course

North Oxford Golf course is located close to BGHS (within a 20 minute drive time). Since the refusal of planning permission (Ref 19/02550/FUL) in March 2020 of Great Wolf's scheme, on the 7th September 2020 Cherwell District Council formally adopted the '[Adopted Cherwell Local Plan 2011-2031 \(Part 1\) Partial Review - Oxford's Unmet Housing Need](#)'. This document sets out strategic planning framework and sets out strategic site allocations to provide Cherwell District's share of the unmet housing needs of Oxford to 2031.

This allocates North Oxford Golf Club for housing to deliver 670 housing units under allocation reference PR6B. On this basis, it is clear that the golf course will close in the short to medium term and will be re-developed for housing.

In terms of the site's deliverability, the document also states in para 5.74 that, '*It comprises some 31 hectares of land and operates with the benefit of a rolling lease from the University college*'. This therefore supports the principle the site can be developed and is deliverable.

On this basis there is a very real probability that this course will be lost in the short term therefore reducing the level of traditional 18 hole courses within the vicinity of the BHGS.

3. Review of the Appellant's report as part of planning application 19/02550/FUL

Throughout the appellants golf study (undertaken by CBRE) and planning statement there are some fundamental errors and misconceptions which need to be addressed in order to fully appreciate and understand the impact of this development on the existing golf club and their facilities should it go ahead.

Golf has always been and will continue to be played over 18 holes and any club that wishes to provide to a sustainable membership which participates in matches, offers charity and society must retain the 18 hole format. As CBRE point out there are other formats of golf which have been created to attract a wider audience and therefore greater participation but to fully provide for every format a club would need to be a course of 18 individual holes.

Golf has been in decline, but statistics show that this decline has ceased and in-fact 2019 shows that there was an increase in Golf Participation despite CBRE deciding not to show this in their document and therefore providing misleading information on Page 9 of their report (Figure 1 below). We have included the statistics from exactly the same source which shows the 2019 increase in Figure 2 below. These statistics were available when the appellant submitted the planning application so it appears the figures have been selected to fit their argument which is disappointing to see and also sheds doubt on the robustness of their report.

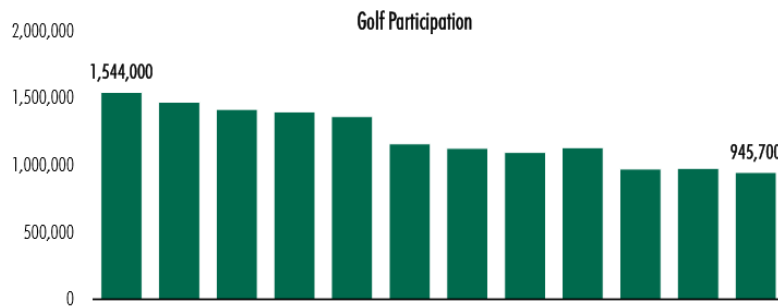


Figure 1 – Extract from Page 9 of CBRE’s Report – no reference to 2019 data

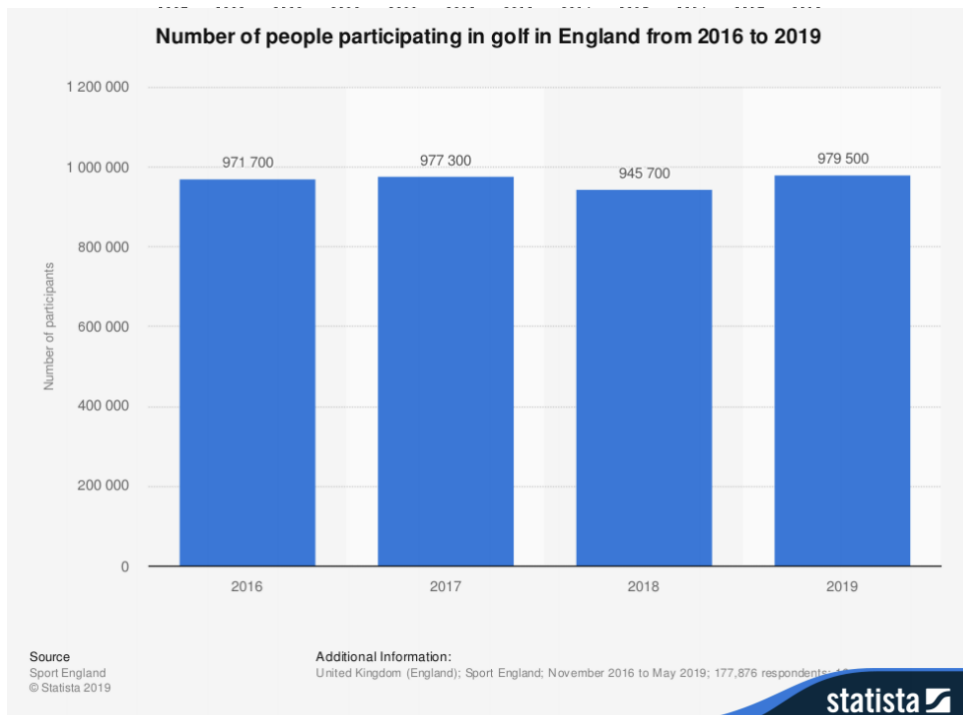


Figure 2 – Statista – CBRE inaccuracies of data

Reviewing the most recent Statista data published in October 2020 (shown at Figure 3 below), whilst the number of participants has reduced year on year from 2019, this does not take into consideration the 7 weeks of national lockdown from 23rd March to 13th May when golf courses closed.

Number of people participating in golf in England from 2016 to 2020

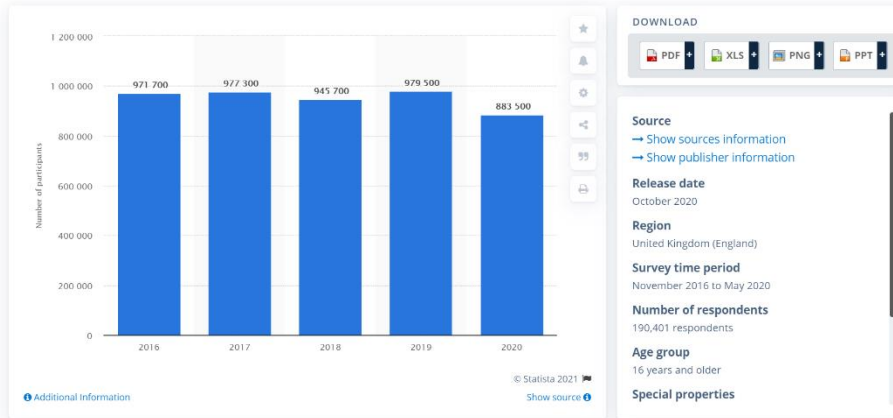


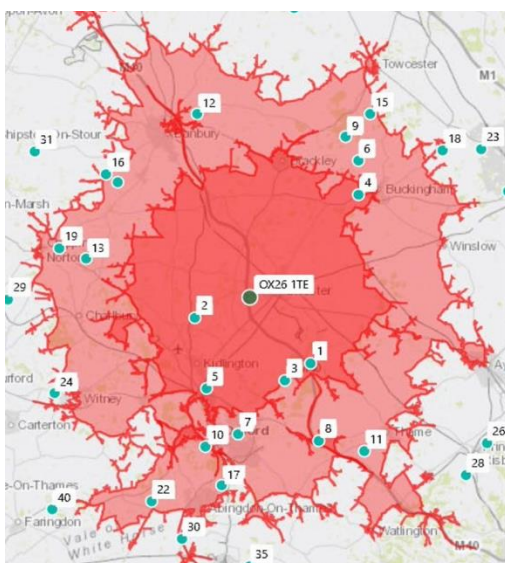
Figure 3 – 2020 Statista Golf Data

Analysing the above, there was 27% (19 weeks rather than 26 weeks) less golf playing time in 2020 as Statista’s survey period was set for 6 months from November 2019 to May 2020. Despite this though, when compared to the 2019 data the number of participants has only reduced by 10%. This is a clear indicator that more people played in 2020 when compared to 2019 which supports the trend that golf participation continues to rise year on year further supporting the need to protect existing golf courses.

In 6.20 of the CBRE report they put great emphasis on increased amenity value to 9 holes as opposed to 18 holes. All courses in the area, including BHGS, offer any member of the public the ability to play 9 holes for a reduced fee so to continually make this statement throughout the document is not only misleading but incorrect by definition.

The Local Golf Provision map on page 16 of the CBRE along with Appendix B both shown below has a multitude of inaccuracies in it as the club numbers annotated on the map to not correlate in any way to the table of clubs. Some of the errors are shown below.

- 1 is not BHGS its Magnolia Park
- 3 is Studley Wood
- 4 is not Studley Wood and there is only 1 course near to Buckingham town centre.
- The remainder of the numbering seem to be out by 1



#	CLUB	ADDRESS	POSTCODE	DIST (MI)
1	Bicester Hotel Golf & Spa	Green Lane Chesterton, Bicester	OX26 1TE	0
2	Kirtlington Golf Club	Kirtlington Golf Club Kirtlington, Oxford	OX5 3JY	4.35
3	Magnolia Park Golf And Country Club	Arncott Road Boarshall, Aylesbury	HP18 9XX	6.32
4	Studley Wood Golf Club	The Straight Mile Horton-Cum-Studley, Oxford	OX33 1BF	6.49
5	North Oxford Golf Club	Banbury Road, Oxford	OX2 8EZ	7.42
6	Oxford Golf Club	Hill Top Road Cowley, Oxford	OX4 1PF	10
7	Buckingham Golf Club	Tingewick Road, Buckingham	MK18 4AE	10.65
8	Hinksey Heights Golf Club	South Hinksey, Oxford	OX1 5AB	11.34
9	Waterstock Golf Club	Thame Road Waterstock, Oxford	OX33 1HT	11.42
10	Heythrop Park Resort	Heythrop Park Enstone, Chipping Norton	OX7 5UF	12.01

Due to the inaccuracies of the map provided in the CBRE submission it now reduces the courses available within a 20 minute drive to 4 not 5.

PAW has been in constant communication with the golf club throughout this planning process as they have a huge stake in the outcome of this application. During meetings with Members of the golf Club, they have provided shocking statistics that should the club be reduced to a 9 hole format course then over ¾ of the current membership would leave to join another club which offered the full 18 holes. This will undoubtedly created viability issues for the club.

This presents two further issues in that over half of the current members live in Chesterton or Bicester adding to the unsustainability and reliance on the use of the private car to travel potentially some distance to a new club. Having spoken to the 3 clubs (Not 4 as in CBRE report) within 20 minutes' drive of BHGS there are only potentially 170 spaces available, in total for full memberships which exceeds the likely 185 members that would be seeking a new membership.

4. Review of England Golf's Report

As supported in the letter at Appendix 1, it is PAW's view that England Golf's report does not provide a realistic and reliable conclusion of the golf provision in the local area. It states the following: -

'Within the identified region there is a relatively low demand for golf when compared to the average for the South East region. The demand is split evenly over the 9 golfing profiles, both club-based and independent. There is a high level of golf provision within the area in comparison to the demand, with a good number of traditional 18-hole courses.'

The key reasons for this are as follows: -

Drive Times

On Pages 8, 9 & 10 of the report it states the golf courses located within 20 minutes of BGHS. The inclusion of these courses are used in the assessment of the current provision in the area.

Shown at Appendix 6 are screenshots of drive time analysis of these courses undertaken at 2045 on 9th January 2021. This time period was chosen to present a best case scenario in terms of free flowing traffic and therefore the quickest travel times being a Saturday evening. These are summarised as follows; -

Club	Time from BGHS	Conclusion
Hinksey Heights	21 mins	Time is close to 20 mins but the route to club is fraught with issues with the A34 regularly subject to traffic jams and delays therefore this should be excluded from the analysis
Waterstock	20 mins	Agreed within 20 mins (approximately)
The Oxfordshire	27 mins	Not within 20 mins
Buckingham	19 mins	Agreed within 20 mins (approximately)

On the basis of the above, the Oxfordshire and Hinksey Heights should not be included in the analysis and therefore the conclusion made in relation to the level of courses is wrong. Both are traditional 18 holes courses. This highlights a clear inaccuracy in the report therefore casts doubt on the robustness of the analysis.

North Oxfordshire Golf Course

North Oxford Golf course is rightly included in the analysis being one of the closest courses to BHGS. As stated in the above planning policy section, the course has recently been allocated for housing in 'Adopted Cherwell Local Plan 2011-2031 (Part 1) Partial Review - Oxford's Unmet Housing Need' and is stated as being a deliverable site with the landowner having the benefit of a rolling lease with its tenant.

On this basis the course will close in the short to medium term therefore significantly reducing the level of course provision (traditional 18 hole course) in the area. This further supports the need to maintain the golf provision in the area and if anything, increase it as per the conclusions of Cherwell's Sports and Facilities Strategy. On the basis of the above two points, a sensitivity of the analysis should be undertaken by England Golf omitting both North Oxford, The Oxfordshire and Hinksey Heights to be robust.

Analysis is just a snapshot and is not forward looking

England Golf's report, unlike Cherwell's Sports and Facilities Strategy report, is undertaken at a moment in time and does not take into consideration of the prospective growth in population in the area.

Bicester has been designated as a Garden Town with strategic allocation of significant housing delivery over the next 20+ years. The population of Cherwell District is planned to grow from 147,500 in 2017 to 181,900 by 2027 (+34,300, 23%) and the majority of this growth will be in the two major settlements in the district, namely Bicester and Banbury (source: JSNA 2007-2017 Population Forecast). On this basis it is important that green spaces, sporting / golfing facilities are protected and enhanced to support the growing population.

5. Conclusion

PAW and the BGHS Golf club are deeply concerned with the lack of consultation from the Appellant throughout this process. At no point has the appellant engaged with the golf club to discuss the plans and importantly how the new course design could work. The proposed replacement of the 18 hole traditional course with a 9 hole will have a material impact on the attractiveness of the club for new members and the retention of existing members.

There is no evidence to state that the current 18 hole course is surplus to requirements. A key indicator of this would be the golf course having financial difficulties but the last three years set of accounts appear to illustrate golf revenues continue to perform well.

Statista data (used by the appellant at application stage) clearly shows that year on year golf participation is rising which is supported by data from Statista. Within Statista's survey period in 2020 (Nov 19 - May 20), the total amount of playing time reduced by 27% however participation only reduced by 10% clearly showing that golf is in demand and continues to thrive.

Bicester and surrounding areas are expanding and the population needs sport facilities to support this growth as outlined in Cherwell Sports and Facilities Strategy. It is imperative that sport facilities that continue to do well are protected and grown.

PAW firmly believes that the reason for refusal still stands and the information within this document fully supports the view that this proposal is unacceptable and would result in the loss of a key local golf facility that is needed to support the housing growth of Bicester and surrounding areas in years to come.

Appendix 1 - BGHS Golf Committee Member's letter

Mr P Brain
Bicester Golf Committees' Chairman
c/o Bicester Hotel Golf and Spa
Chesterton
Bicester
OX26 1TE

S R G Baird BA (Hons) MRTPI
Planning Inspectorate
Temple Quay House
2 The Square
Bristol
BS1 6PN

10 January 2021

Dear Sir,

Objection from the golf committees and golf members at Bicester Hotel Golf and Spa to the development by Great Lakes UK Ltd at Bicester Golf Club, Chesterton. Appeal ref. APP/C3105/W/20/3259189

My name is Paul Brain, I am chairman of the golf members' committees at Bicester Hotel Golf and Spa (BHGS). The golf committees represent the golf members and are headed by the ladies', men's and seniors' captains.

I write on behalf of:

- The club captains namely, Ladies Captain - Roberta Miles, Men's Captain - Richard Topliss, Senior's Captain - Dave Scott.
- The ladies' and men's golf committees
and
- The golf club members.

We have reviewed the appeal documentation submitted by Great Wolf and also the England Golf report commissioned by the appellant and provide comments as follows which are to be used to support Parishes Against Wolf's 'PAW' objection on the loss of the golf course.

Bicester Golf Club, formerly Chesterton Golf and Country Club is a long-standing community and a far-reaching club of 50 years, it has an active membership of men, ladies, seniors and juniors of around 225 members. I can confirm Great Wolf has made no attempt to engage with the golf club at any stage. The lack of consultation on what will have a material impact on our society is very disappointing. We have not even been advised on the layout and plans of the proposed new course.

The golf club with its 18-hole golf course is a vibrant and social club with much to offer to the members and local community. Each year there are approximately 175 internal competitions, 47 matches against other clubs and £10,000 raised for local charities. The benefits of this club extend to the large numbers of visiting golfers, single groups, golf societies, charity events and community groups who pay fees to play.

The 2019 accounts of Bicester Hotel Limited contain a strategic report dated 3 June 2020 that refers to golf "continuing to thrive" having reopened after the March 2020 lockdown. Golf members contribute to the accommodation, food and drink revenue streams at the hotel in addition to their membership and green fees.

It should be noted that when the members were first advised of the original Great Wolf development the membership declined as members realised that the proposed development would destroy the course and Club and, that when the Planning Application was rejected, the membership numbers increased once more as the Club's future seemed to be secure.

There has been little or no effort on behalf of BHGS to recruit new golf members, albeit offers have been made by captains and committees to assist and discuss the way forward to increase membership. This has led to a Club which is under utilising the opportunities of the golf facilities and BHGS would be better placed to invest in growing the club rather than disposing of a valuable local asset.

Two local courses have recently closed (Magnolia Park and Carswell) with two others are facing imminent closure (North Oxford and Waterstock). This demise is not due to a lack of members or visitors but due to commercial or residential development. The closure of these clubs has and will put more pressure on the remaining clubs in the area and making it even more important to preserve the golfing facility at BHGS.

The suggestion of a 9-hole golf course in place of the existing 18-hole course would mean the membership would reduce, as already demonstrated when the planned development was first announced, putting the long-term future of the golf club in severe doubt. The club competitions and inter club competitions would not be sustainable on a 9-hole course. It would be a huge challenge to persuade other clubs to play matches against us on a reduced and diminished facility, namely a 9-hole course. Charities and particularly golf societies and golf break groups do not choose 9-hole courses for events or social golf days.

Any half serious golfer of which there are many thousands in the UK would not elect to play a 9-hole course over an 18-hole course. This is very clearly demonstrated by a quick review of golf break and golf day brochures where there are very few clubs offering 9-hole courses for this type of business. No golfer considers a course with 18 tees and 9 greens (each green being played twice) an 18-hole course!

There is a 9-hole (academy) course close by at Kirtlington and it is run in conjunction with their competition standard 18-hole course. The 9-hole course compliments their fine facility and provides a fun short course for members, juniors and beginners. It is a perfect combination but not a viable standalone solution for a thriving club.

Kirtlington is our nearest golf club neighbour and is known to be approaching its membership capacity and would not be able to accommodate an exodus of members from Bicester wanting competitive and leisure golf on an 18-hole course.

Other 'local' clubs have been suggested by England Golf as being within 20 minutes driving time of Bicester and therefore providing golf provision for our catchment area. The 9 clubs that have been named are Kirtlington, Buckingham, North Oxford, Tadmarton, Studley Wood, Waterstock, The Oxfordshire, Hinksey Heights and Rye Hill. As previously stated, North Oxford and Waterstock are likely to be redeveloped in the short-term. Given that we are the locals we know how the traffic affects journey times we can say quite categorically that of the others it is only Kirtlington which would fall into this category of being reachable within a 20 min journey time from Bicester. We therefore believe that the conclusion of the England Golf report that there is a high level of golf provision in the area in comparison to the demand is fundamentally flawed.

Golf is supported as a key designated sport by Cherwell District council. Golf is year on year becoming more popular. The 18-hole course at Bicester on the edge of a densely populated, and rapidly growing, built-up area will provide exercise and fitness to the local community and make a significant contribution towards the physical health and mental wellbeing of the community. The COVID pandemic has shown how important golf is to many and we have seen increased use of the facility over the summer of 2020 both from new members and pay-as-you-play.

The public footpath which runs through the golf course would be affected by the development. Currently the golfers and walkers live in harmony with the walkers benefiting from the environment created by a golf course. The footpath would have to be relocated to accommodate the development leaving the walkers to enjoy a walk around a concrete jungle.

The development will devastate a beautiful and splendid, well-regarded golf course available to golfers and the public.

In addition to the inappropriate development giving rise to the loss of a much-needed facility we are also aware of all the other negative consequences that this development will bring about. We list these below:

- Increased traffic volumes through our small villages on roads which are inadequate to cope causing pollution and traffic queues. Given the projected traffic journeys this could at times amount to gridlock in Chesterton. We would point out that when Bicester village opened, gridlock in Chesterton became a regular occurrence. This was only resolved when the road layout and slip roads on and from the A41 were rerouted.
- The enormity of the development in a village is inappropriate and not in keeping with the local area.
- The development is ecologically and environmentally ruinous.
- Severe disruption during construction for some two years or more.
- There will be no benefit to local businesses as those using the facility generally stay on site.
- Increased pollution from light and noise emissions and increased air pollution from the increase in traffic volumes.

- No social benefit to the local community, as no or limited access to the facility other than expensive day passes.
- The jobs provided by this development will not benefit the local community as unemployment is negligible. Therefore, this would require the recruitment of staff from outside the area leading to more traffic and increased pollution.

Given the original objections were overwhelming and the decision by Cherwell District Council was unanimous in its rejection of this scheme it would be appropriate to maintain the current planning decision and reject the Appeal.

Yours faithfully

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

Paul Brain on behalf of Bicester Golf Committees and members

Appendix 2 – Cherwell District Council’s Sports Facilities Strategy – 2018

Extract from study as noted by the
Council's Executive 1 October 2018

CHERWELL DISTRICT COUNCIL

**OPEN SPACE, SPORT AND RECREATION
ASSESSMENT AND STRATEGIES**

**Part 2:
Sports Facilities Strategy**

August 2018



Nortoft Partnerships Limited
The Old Barn, Nortoft Cottage, Nortoft, Guilsborough,
Northamptonshire NN6 8QB
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SECTION 11: GOLF

- 11.1 Golf makes a contribution of around £3.4 billion per annum to the English economy. Golf also occupies an important position in the English sporting landscape. It is the fifth largest participation sport in the country and has about 675,000 members belonging to around 1,900 golf clubs.
- 11.2 Like many other sports in England, golf faces some serious challenges, and the number of golf club members has been declining since 2004. This in turn has put a financial strain on many golf clubs that are reliant on membership income. Nationally, participation in golf has also been declining steadily since 2007 due to lifestyle shifts and competition from other sports.
- 11.3 As the commercial sector is the most important provider of golf in the area, the development of the courses will reflect a combination of demand and appropriate site opportunities. Several golf courses have also now developed footgolf within their site, which is always available on a pay and play basis.

Golf design and activities

- 11.4 There are a number of ways in which golf is played, from the standard 18 hole golf course, to shorter Par 3 courses, driving ranges, pitch and putt and other short courses, adventure and even crazy golf. The main sporting facilities are considered to be full courses, short courses, par 3 courses, and driving ranges. Entertainment centres such as Topgolf and other golf experiences/activities are becoming increasingly popular and seen as an accessible introduction to the sport.

Participation in golf

- 11.5 The Sport England (Sport England, 2017) statistics for participation in golf shows that amongst adults around 1.12 million people take part in golf at least once a month. Men's participation is about four times greater than that of women. Nationally the rate of participation in golf fell between 2007 and 2016. The highest rates of participation are amongst those aged 55 years plus, and amongst the more affluent socio-economic groups.
- 11.6 England Golf estimates that there are around 675,000 members of approximately 1,900 affiliated clubs nationally, and a further 2 million people playing golf outside of club membership. The NGB's information confirms that of Sport England, that participation and club membership has been in decline since 2004 and has only recently been showing signs of levelling off.

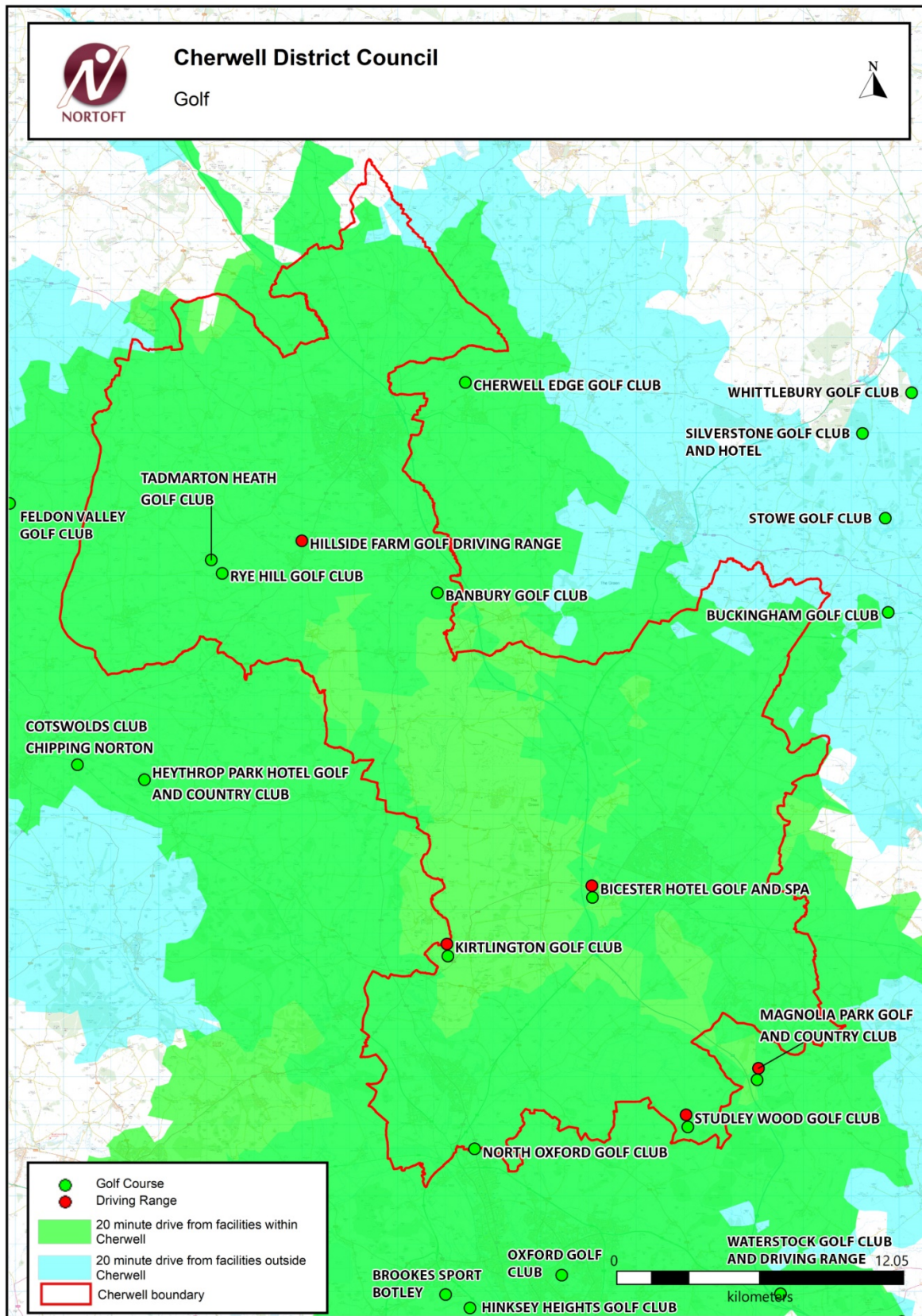
Current provision

11.7 There are currently 8 golf sites in Cherwell. These are listed in Figure 55, and mapped in Figure 56. Notably, there are no Par 3 courses in Cherwell since the closure of the Drayton Leisure and Golf site near Banbury, and the Kirtlington Course is a 9-hole loop.

Figure 55: Golf facilities in Cherwell

Sub area	Site Name	Facility type	Size (holes/bays)	Access	Affiliated to England Golf
Banbury	Banbury Golf Club	Standard course	18	Pay and play & membership	Yes
Banbury	Hillside Farm Golf Driving Range, Bloxham	Driving range	15	Pay and play	No
Banbury	Rye Hill Golf Club	Standard course	18	Pay and play & membership	Yes
Banbury	Tadmarton Heath Golf Club	Standard course	18	Pay and play & membership	Yes
Bicester	Bicester Hotel Golf and Spa	Standard course	18	Pay and play & membership	Yes
		Driving range	10		
Bicester	Studley Wood Golf Club	Standard course	18	Pay and play & membership	Yes
		Driving range	13		
Kidlington	Kirtlington Golf Club	Standard course	18	Pay and play & membership	Yes
		Standard course	9		
		Driving range	20		
Kidlington	North Oxford Golf Club	Standard course	18	Pay and play & membership	Yes

Figure 56: Golf courses map



Assessment of current supply and demand

- 11.8 The spread of golf provision means that everyone with access to a car can reach a course within 20 minutes drive time. The current balance in supply and demand is not possible to assess accurately as the membership figures and pay and play use of the individual golf sites are commercially sensitive information. England Golf has however developed golf participation modelling.
- 11.9 It is known that golf facilities are sensitive to economic changes. One of the sites close to Banbury closed in 2014, and a stand-alone golf driving range at Heathfield near Bletchington is currently subject to a planning application to convert the site to footgolf and two small sided grass football pitches. These closed facilities have not been included within the assessment. At least one other golf course has changed ownership in recent years, so this would suggest that there may be a slight excess of supply over demand or just about a balance in supply and demand at the present time. England Golf latent demand analysis suggests there may be the potential for more demand, but in Cherwell the current 18 hole dominant format may be hindering this potential.
- 11.10 Figure 57 shows the average membership of the Cherwell clubs and of surrounding districts, provided by England Golf. The average membership levels in these four Oxfordshire districts (26 clubs in total) are similar though significantly below the national average. Whilst all courses and sites will be different, this suggests there could be some spare capacity. Not included however in these numbers are any pay and play usage of courses.

Figure 57: Membership of golf clubs in Oxfordshire

District	Average affiliated members per club
Cherwell	385
Vale of White Horse	364
South Oxfordshire	320
West Oxfordshire	385
England	460

Source England Golf and EG Club Survey 2016

- 11.11 The North Oxford Golf Course has a club with no security of tenure, and the landowners have put the site forward for housing development. The site has been included as a proposed urban extension in the Submission Partial Review of the Cherwell Local Plan (Part 1): Oxford's Unmet Housing Need.
- 11.12 The distribution of the golf courses is uneven across the authority, with more than double the number of golf course holes per 1,000 population in the Kidlington area which is within easy reach of Oxford, than in either the Banbury or Bicester area, see Figure 58. This suggests that a significant proportion of the players in the courses in the Kidlington area travel from outside the district, most likely from Oxford City.

Figure 58: Current rates of provision of golf by sub area

Golf facility	Current provision			Current rate of provision per 1000 population for sub area		
	Banbury	Bicester	Kidlington	Banbury	Bicester	Kidlington
Golf courses, number of holes	54	36	45	0.75	0.71	1.77
Driving ranges, number of bays	15	13	20	0.21	0.45	0.79

Consultation findings

Club comments

11.13 Consultation was undertaken via England Golf. None of the golf clubs responded to the web based survey.

National Governing Body comments and strategies

11.14 Sport England recognises England Golf as the lead national governing body for this sport.

11.15 The England Golf Strategic Plan 2014-17 (England Golf, 2014) aims to increase golf participation, to increase the number of members of clubs, to strengthen clubs generally, and to support talented golfers. There are no specific facility proposals for Cherwell. This plan is due to be updated in summer 2017.

11.16 England Golf provided information for Cherwell from their recent (unpublished) England Golf Club Survey. This suggests that the rate of membership of Cherwell clubs is approximately in line with the rates across the other authorities in Oxfordshire excluding Oxford City itself, but that these are lower than the average for England.

11.17 England Golf also provided information about their market segmentation work undertaken to support sports development. This is based on a 20 minute drive time catchment, and 9 golfing segments. These segments are different from those used by Sport England, and are:

- Segment 1: Casual/Relaxed Member
- Segment 2: Older Traditionalist
- Segment 3: Young Family Members
- Segment 4: Young Fanatics
- Segment 5: Young Actives
- Segment 6: Enthusiasts

- Segment 7: Occasional/Time Pressed
- Segment 8: Social Couples
- Segment 9: Casual Fun

11.18 England Golf comments that there are good levels of interest across all 9 of the market segments in Cherwell, both club based and independent.

11.19 The national governing body commented that the number of affiliated clubs and driving ranges in Cherwell which have pay and play access in addition to membership, means that there is good open access to golf, though there are no Par 3 courses or other shorter formats which are more suitable for the beginner and for young people.

Individual online survey results

11.20 Only 17 (9%) of the respondents to the individual online survey said that they use golf courses. About 45% of individuals responding to the survey had views about the amount of golf course provision in the district and of these, 13% felt that there was too much provision for golf, 77% felt that there was about the right amount of provision, and 10% felt that there was too little.

11.21 Of the respondents who play golf, the key points are:

- 15 of the 17 either live or work in the district
- Of the 17 respondents:
 - 64% are male: 36% are female
 - About 50% were aged 25-45 years, with about 30% aged 45-60 years old, and 20% over 60 years. There were no respondents playing golf aged under 25 years
 - 63% of people playing golf are either professionals or managers/directors/company owners, whilst 18% are retired, and 9% are at home and not seeking work
 - 90% consider themselves to be white
 - 81% feel that there is about the right amount of golf provision
 - 70% play at least once a month, with about 30% playing on a weekly basis

Adjacent authorities' provision and strategies

11.22 A review of the coverage of golf provision and proposals within the adjacent authorities has been undertaken. In summary:

- The Aylesbury Vale strategy of 2012 concluded that the district was well served by golf courses with a mixture of 18 and 9 hole courses and driving ranges. The courses are well geographically spread across the district. There was no indication that the courses were operating at full capacity, and the conclusion was that no additional courses were required.
- Oxford City's Playing Pitch and Outdoor Sports Strategy 2012-2026 identified one course in the city (Southfield) which had community use. The strategy notes the courses on the periphery of the city; North Oxford Golf Course in Cherwell, and Hinksey Heights in the Vale of White Horse. These sites mean that all Oxford residents have access to a golf facility within 15 minutes drive. The Southfield Golf Club was considered to be under used, and the strategy did not identify a need for additional facilities within the city. The strategy proposed sports development initiatives at Southfield, and the introduction of "extreme golf" in the leisure centres.
- South Northamptonshire's draft strategy included golf. It noted that the Cherwell Edge course is close to Banbury. The priorities are to retain and maintain the existing golf courses and facilities but also to support the golf sites to remain open in economically challenging times. There may be a need to enable the development of new courses and driving ranges where appropriate.
- South Oxfordshire's emerging strategy which takes account of the latest housing proposals recommends that the existing golf courses should be protected and that planning policies should be flexible to support new golf provision in various formats.
- Stratford-on-Avon's Open Space, Sport and Recreation Assessment was published in 2011 and updated in 2014 but did not address golf provision.
- The Vale of White Horse's 2014 Leisure and Sports Facilities Study concluded that current distribution of golf courses and driving ranges is uneven across the Vale, but as almost everyone playing the sport has access to a car, they can reach courses and driving ranges within 20 minutes. The priority is to encourage the existing golf sites to remain open, and if possible enable the development of new courses and driving ranges in the Wantage/Grove area.
- West Oxfordshire does not have a sports facilities strategy but the sports proposals are contained in the Infrastructure Delivery Plan (IDP) of 2016. However, the IDP does not assess or propose anything associated with golf.

11.23 Golf in the adjacent rural authorities shows a similar pattern as golf in Cherwell, with capacity at most sites and little immediate demand for new facilities. Significantly the Oxford strategy confirms that there is only one golf course in the city with community use, at Southfield, and that Oxford relies on its neighbours for further provision.

Modelling

Market Segmentation

11.24 The Market Segmentation information from Sport England suggests that golf is a sport which appeals to six of the market segments in Cherwell, all over 45 years of age. None of these market segment groups are likely to be high priorities for sports development initiatives, in part because they are already relatively active.

Summary of current situation

11.25 The network of golf provision across the district is uneven. It is likely that the courses and driving ranges in the Banbury and Bicester sub areas are primarily catering for the population within those sub areas, although there will be some cross-border movement of players, particularly where sites are close to the authority boundary, for example Cherwell Edge. The rate of provision per 1,000 population in these areas are similar, both in relation to the number of holes on courses, and the number of driving range bays.

11.26 The situation in the Kidlington sub area is notably different, with a rate of provision for golf courses at about 235% more than the rates of provision for Banbury and Bicester sub areas. This high rate of provision must be being sustained by the import of players, and this is likely to be mostly from Oxford, as there is only one course in the city.

11.27 As an average across the district, England Golf's club membership information suggests that the rate of membership for Cherwell is approximately in line with the other authorities in Oxfordshire, but this is lower than the national average. This suggests that there is, on average, spare capacity at the existing club sites.

11.28 Unfortunately because of commercial sensitivities, the actual membership of each club is unknown.

Assessment of Future Needs

11.29 The objectives of sports development within the area are to increase rates of participation in sport and physical activity especially amongst young people. As such, the authority may wish to encourage new forms of golf aimed at younger people. Typically, shorter than 18-hole format will be more attractive to younger players. This would suggest a need for more Par 3 and other short format courses, especially as there is only one 9-hole course in the district (and it is not a Par 3).

11.30 Three approaches to the modelling of future needs are considered below. None provides a complete "answer" to the assessment of future needs across the district, but taken together they paint a similar picture. The first two tests forecast forwards

the needs for golf based on the current provision. The third considers the likely growth in club membership in the sub areas, using the average club membership figures per club provided by England Golf.

- 11.31 The modelling includes the golf sites within Cherwell, but excludes sites outside of the district.
- 11.32 Importantly, none of the three models is able to effectively assess the level of imported demand into the Kidlington sub area, likely to be primarily from Oxford. Each of the models consider the demand generated by the forecast population up to 2031, including the new growth from the Partial Review housing.

Average rate of provision across the district

- 11.33 This approach takes the current district wide average rate of supply of golf facilities per 1,000 population and forecasts this forwards based on the population growth of Cherwell for each sub area, Figure 59.

Figure 59: Future golf need based on district average

		Golf courses, number of holes			Driving ranges, number of bays		
		Current supply	Need based on district average rate per 1000	Shortfall	Current supply	Need based on district average rate per 1000	Shortfall
Supply of golf facilities in 2016		135			58		
District rate of provision per 1000 in 2016	District	0.91			0.39		
Current provision	Banbury	54			15		
	Bicester	36			23		
	Kidlington	45			20		
Banbury	2016		65	-11		28	-13
	2021		77	-23		33	-18
	2026		80	-26		34	-19
	2031		80	-26		34	-19
Bicester	2016		46	-10		20	3
	2021		57	-21		24	-1
	2026		67	-31		29	-6
	2031		72	-36		31	-8
Kidlington	2016		23	22		10	10
	2021		24	21		10	10
	2026		27	18		12	8
	2031		33	12		14	6

- 11.34 The outputs in this table suggest that there are current shortfalls in golf provision, of both courses and driving ranges in Banbury, and of golf courses in Bicester. In

the Kidlington sub area however, provision is well above what is needed for the residents now and into the future. Based on this model, the need for golf provision in each sub area by 2031 to meet the needs of the sub area forecast population, including the Partial Review growth around Kidlington is:

- Banbury: 1 x 18 hole course (or 2 x 9 hole courses as alternative), 1 x 9 hole course, 19 driving range bays
- Bicester: 2 x 18 hole courses (or 4 x 9 hole courses as alternatives), 8 driving range bays
- Kidlington: no additional provision

11.35 However, if North Oxford Golf Club was lost to development (as proposed in the Partial Review of the Local Plan) without a replacement facility being provided, this would indicate sufficient provision up to 2026, but a shortage of 6 holes by 2031. To meet Cherwell's own needs a 9 hole replacement golf facility would be required.

11.36 Given that golf facilities are independent and reflect local market demand, the mismatch of supply/demand in this first test does not appear to be a sound basis for future facility planning.

Sub area rate of provision

11.37 This second test takes the current rate of provision of golf facilities within each of the sub areas as the starting point for the future modelling, see Figure 60. This model suggests that additional provision, both of courses and driving range bays will be required across the district in the period up to 2031 to meet the needs of the sub area forecast population, including the proposed Partial Review growth around Kidlington:

- Banbury: 1 x 9 hole course plus some other golf provision with equivalent capacity to 3 holes, 3 driving range bays
- Bicester: 1 x 18 hole courses (or 2 x 9 hole courses as alternatives), 13 driving range bays
- Kidlington: 1 x 18 hole courses (or 2 x 9 hole courses as alternatives), 8 driving range bays

11.38 The level of additional demand in the Banbury and Bicester areas is probably more realistic in this second test than the level suggested by the district-wide modelling. However the outcome for Kidlington is skewed by the current high rate of provision in this sub area, and the demand suggested by 2031 is probably well beyond that which will really be required by the growth in local population.

Figure 60: Golf need based on sub area rates of provision

		Golf courses, number of holes			Driving ranges, number of bays						
		Current supply	Need based on sub area rate per 1000	Shortfall	Current supply	Need based sub area rate per 1000	Shortfall				
Supply of golf facilities in 2016	Banbury	54			15						
	Bicester	36			23						
	Kidlington	45			20						
Rate of provision per 1000 in 2016 by sub area	Banbury	0.75			0.21						
	Bicester	0.71			0.45						
	Kidlington	1.77			0.79						
Banbury	2021				64			-10		18	-3
	2026				66			-12		18	-3
	2031				66			-12		18	-3
Bicester	2021		44	-8		28	-5				
	2026		52	-16		33	-10				
	2031		56	-20		36	-13				
Kidlington	2021		46	-1		21	-1				
	2026		53	-8		23	-3				
	2031		64	-19		28	-8				

Modelling future growth based on membership

- 11.39 The third modelling test forecasts forwards the expected membership of Cherwell golf clubs based on the population growth. This is based on the known average club membership figure of 385 for Cherwell, based on the England Golf 2016 information for the 7 membership clubs in the district, giving a total of 2,695 golf members in 2016. With a current Cherwell population of 148,276, this gives an average rate of golf club membership of 18.18 per 1,000 population.
- 11.40 As it is not possible to determine what proportion of the golf membership is from people living outside of the district, or conversely how much demand is exported, for example to South Northants, it is assumed that the export and import of golfers is balanced.
- 11.41 The current national average rate of membership per golf course is 460 members, based on information provided by England Golf. The “used capacity” of the clubs in Cherwell can therefore be assessed by comparing their average membership to the national average. Unfortunately, as the actual memberships of individual clubs is commercially sensitive information, it is not possible to accurately assess the take up of golf in different areas of the district, nor how well supported are the individual golf sites. The outcomes of this modelling can again therefore only be used indicatively.

11.42 This model suggests that additional golf club provision is likely to be needed in parts of the district in the period up to 2031 to meet the needs of the sub area forecast population (which includes the Partial Review growth around Kidlington):

- Banbury: possible need for one additional club (unmet demand equates to just under half of a club)
- Bicester: one extra club
- Kidlington: no additional provision required

Figure 61: Forecast golf membership to 2031

		Clubs in sub area	Estimated capacity of clubs based on national average of 460	Estimated used capacity of clubs based on Cherwell average of 385	Current spare capacity (number of members)	Membership by sub area based on district average of 18.18 per 1000	Membership growth	Balance in supply and demand by membership
Banbury	2016	Banbury Golf Club,	1380	1155	225	1307		73
	2021	Rye Hill Golf Club,				1539	232	-159
	2026	Tadmarton Heath				1592	285	-212
	2031	Golf Club				1593	286	-213
Bicester	2016	Bicester Hotel Golf	920	770	150	927		-7
	2021	and Spa, Studley				1135	208	-215
	2026	Wood Golf Club				1341	414	-421
	2031					1437	510	-517
Kidlington	2016	Kirtlington Golf Club,	920	770	150	461		459
	2021	North Oxford Golf				475	14	445
	2026	Club,				540	79	380
	2031					653	192	267
District	2016		3220	2695	525	2695		525
	2021					454	71	
	2026					777	-252	
	2031					989	-464	

11.43 In the Banbury area whether there is sufficient unmet demand by 2031 in the sub area to justify a new golf site is uncertain and will largely depend on the way in which the sport develops in the next few years. Perhaps more likely will be the desire of the existing sites to develop new forms of the game, potentially with new additional shorter courses.

11.44 In the Bicester sub area, there is already a slight shortfall of provision, but this will increase in the period up to 2031 at a level which will mean that a new golf club is very likely to be required with a standard course(s) and driving ranges. Alternatively the existing clubs may also wish to expand, potentially with new shorter courses and/or new forms of the game.

11.45 In the Kidlington area there is currently a significant surplus of supply, and even with the growth in the population in the sub area up to 2031, there will still be a surplus of 0.5 courses by 2031, see Figure 61. If North Oxford Golf Club is lost to development without replacement (assuming a loss of 460 members based on the national average membership) this would suggest a deficiency in supply and

demand by membership of -1 in 2016, -80 in 2026 and -193 members in 2031; less than an average club membership. However this does not take into account any additional demand arising from outside of Cherwell but being met by courses in Kidlington.

Summary of the modelling

- 11.46 There are no robust mechanisms for assessing the supply / demand balance for golf as the usage information for the individual golf courses is commercially sensitive. The England Golf modelling is based on a drive time catchment of 20 minutes, which for the Kidlington area, encompasses almost all of Oxford, parts of the Vale of White Horse and West Oxfordshire, each of which have golf courses. For Banbury and Bicester, the 20 minutes drive time catchments also cover areas within the adjacent authorities, and there are golf courses there within easy reach of the towns.
- 11.47 Each of the modelling tests suggest a similar picture; that by 2031 there will be a need for additional golf provision for both Banbury and Bicester. The amount of existing provision in Kidlington is sufficient to meet the needs of the forecast population of the sub area alone up to 2031, but this excludes any consideration of imported demand from Oxford or elsewhere.
- 11.48 The table in Figure 62 provides a summary of the modelling, taking into account the overall findings of the three modelling tests, rather than relying on one specific model.

Figure 62: Golf course and driving range deficiencies and needs up to 2031

	Banbury sub area	Bicester sub area	Kidlington sub area
2016	No known deficiencies	No known deficiencies	No known deficiencies
2031	1 x nine hole course At least 3 bays	1 x 18 hole course or 2 x 9 hole courses 8 bays	Retain current level of course provision or if appropriate replace with shorter formats

Meeting the needs of the future

- 11.49 Cherwell District Council is only able to make a significant impact on golf provision through the local plan policies as golf courses are generally provided by the commercial sector. Given that there may be a need for more provision into the long term due to housing growth, particularly in the Banbury and Bicester sub areas, it is recommended that planning policies should generally be positive towards new golf

proposals and seek to protect existing sites. There may also be a need to replace or redevelop some of the existing 18 hole courses to enable shorter game formats, to support and widen participation, where such proposals are likely to be viable.

- 11.50 The Kidlington area appears to have some spare capacity at the present time and the growth in the population alone for this area within Cherwell District is not likely to take up all of the spare space even in the longer term, indicating Cherwell's needs can be met. However, the area is likely to be providing golf opportunities for people living elsewhere, likely to be predominantly Oxford. It should be assumed that this demand will remain in the long term, and potentially grow with additional population planned within the catchment areas for the clubs, both in Oxford City and West Oxfordshire.
- 11.51 Should the North Oxford Golf Course be confirmed for housing development (as proposed in the draft Partial Review of the Plan), the above analysis indicates (based on the district average of demand, Figure 59) that the long term shortfall in provision to meet the demands of the forecast population in the Kidlington sub area alone may be in the order of 6 holes. The minimum replacement facility requirement to solely meet the needs of the Kidlington population (excluding consideration of any imported demand) is therefore one 9 hole golf course.
- 11.52 However as there appears to be a significant level of importation of golf players into the Kidlington area, additional analysis would need to be undertaken in relation to the potential loss of the North Oxford Golf Course to confirm whether full replacement is needed.
- 11.53 As golf has a significant commercial element, the provision for this sport is likely to respond most to economic conditions and will change to reflect patterns of demand. Over time the expectations for golf change and it will be important for the golf clubs to respond to these in order to keep the facilities as viable and vibrant as possible. England Golf advises that more flexibility in membership options and in course formats are part of the changes needed to ensure increased viability.
- 11.54 Assuming that the economic conditions remain similar or better than today into the long term, the increase in housing numbers in Cherwell and its surrounding authorities will bring more direct demand for golf in its various forms. The currently forecast long term need is for additional provision by 2031 of:
- Banbury sub area: 1 x nine hole course, 3+ driving range bays
 - Bicester sub area: 1 x 18 hole course or 2 x 9 hole courses, 8 driving range bays

Justifying developers' contributions

- 11.55 It is not recommended that developers' contributions are sought for improving golf facilities in Cherwell district as in the longer term it is anticipated that the commercial sector will respond to the changing demand for golf.

Recommendations for golf

11.56 It is recommended that the Council and relevant stakeholders consider the following to address golf provision in the district:

11.57 To support the Council's policies on health and well-being, as well as supporting sports participation, performance and excellence, it is recommended that the Council continues to support community access to golf opportunities via its partners.

Protect

11.58 The existing golf course sites should be protected, unless the tests set out in the National Planning Policy Framework are met.

11.59 Should there be a loss of the North Oxfordshire Golf Course to housing development, then alternative golf provision may be appropriate if a replacement facility is required, informed by an assessment of need.

Enhance and provide

11.60 It is recommended that positive planning policies are adopted to enable the development of new golf provision, in various formats, both on existing sites and on new sites. However these policies must also be balanced with other policies relating to the impact of golf on the countryside.

11.61 The expected new golf requirements up to 2031 are:

- Banbury sub area: 1 x nine hole course, 3+ driving range bays
- Bicester sub area: 1 x 18 hole course or 2 x 9 hole courses, 7 driving range bays

Appendix 3 - England Golf's report on golf provision in the area dated December 2020



ENGLAND
GOLF

England Golf Facility Planning Report





Bicester Hotel, Golf and Spa

Cherwell Local Authority, South East Region.

Background

Golf is the fifth largest participation sport in the Country, with around 630,000 members belonging to one of 1850 affiliated clubs and a further 2 million people playing golf independently outside of club membership.

More than more than 4 million people have played golf on a full-length course in the last 12 months – this is an increase on previous years and highlights a growing golf participation market. Other notable figures regarding golf club participation in the last 12 months suggest a large and growing market of new and existing golfers:

- 2.6 million have used driving ranges
- 2.1 million played a short course
- 3.7 million played pitch & putt
- 6.8 million have been to Adventure Golf facility (Source: Sport MR)

England Golf have seen a decline in affiliated golf club members in recent years, but this reflects the wider range of golfing options available, even to people who enjoy playing full-length courses.

Facility Strategy

England Golf published the 'Raising Our Game' strategy in 2014, which clearly defined the organisation's strategic direction for the 2014-2017 window. This document highlighted the need for a strategy to enhance market understanding of the size and shape of the golfing market and to map alongside the golfing facilities catering for that demand.

Jigsaw research were commissioned by England Golf in 2015, in order to create a market segmentation which is specific to golf. The research identified that 24% of adults in England are potential players. This is made up of – 9% current players, 8% lapsed players and 7% latent players – amounting to c.9.6 million people in total. It also provided England Golf with 9 defined profiles and clearly identified behaviours, motivations and barriers within each one.

England Golf then worked with LCMB, facility consultancy, to utilise the segmentation work to develop a facility strategy and create some practical tools to overlay supply with demand. When looking at a club, Local Authority or Region, our mapping report can identify the total number of golfers within a 20-minute catchment. This number will include current, lapsed and latent golfers – the full 24%.

Methodology

The mapping tool is a statistical data engine that identifies golfing demand within a 20-minute drive of each golf facility within England. It does this by utilising the demographic information taken from the CACI Acorn model and applies a statistical analysis to convert demographics into a likely breakdown of the 9 golfing profiles, as identified by the Jigsaw Research.



The tool allows us to identify the dominant profiles within the catchment area and review by Region and Local Authority and also by a specific club/facility. This can then be used to predict likely demand for each type of facility and to support informed marketing, development and investment decisions.

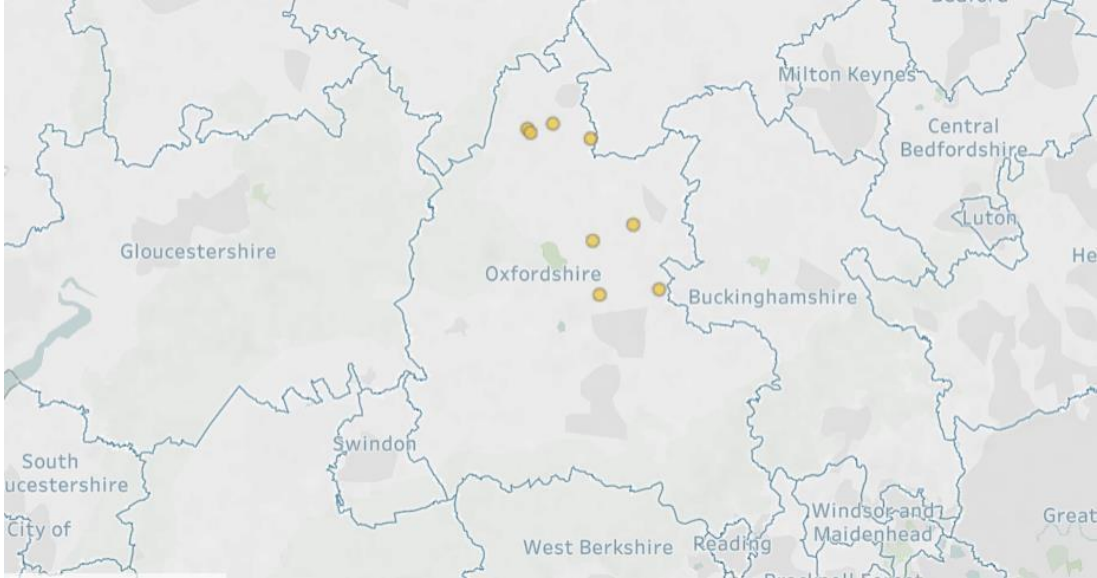
The facilities at each golf club are also included, so we can review and cross-check information listed within any additional supporting documents such as number of holes, number of courses, number of driving range bays, championship courses (during the next 3 years) and performance centres (England Golf).

In addition to the mapping tool, we have guidance on 'Understanding Your Market' for the type of golfing experience that particular profiles are looking for, which enables facilities to adapt their offer to cater for a range of different needs.

Local knowledge and desk based research will also help to paint a fuller picture of the golfing opportunities available within the surrounding area. Each of these is intended to be offered to clubs in a structured manner in conjunction with England Golf.

Analysis

Within Cherwell, there are six affiliated clubs and one non-affiliated facility.





The demand for golf within the borough and the region by profile as follows;

Profile Name	Average number of people per club/facility/local authority (within 20-minute drive time*)	
	<u>Local Authority</u>	<u>Region</u>
	Cherwell	South East
1: Relaxed Members	2,881	6,149
2: Older Traditionalists	2,656	5,662
3: Younger Traditionalists	2,764	5,836
4: Younger Fanatics	2,883	6,193
5: Younger Actives	2,798	5,960
6: Late Enthusiasts	2,775	5,943
7: Occasional Time Pressed	2,798	5,941
8: Social Couples	2,711	5,781
9: Casual Fun	2,997	6,494

**The figures represent the number of people within each profile, within a 20-minute drive time of each club/facility. It is averaged to ensure no double counting and is therefore at its most accurate at club/facility level.*



In addition, the following outlines the demand for each of the clubs and facilities within a 20-minute drivetime.

Profile Name	Average Number of People per Affiliated Facility (within 20-minute drive time*)				
	<u>Non-Affiliated Club</u>	<u>Affiliated Club</u>	<u>Affiliated Club</u>	<u>Affiliated Club</u>	<u>Affiliated Club</u>
	HILLSIDE FARM GOLF DRIVING RANGE	KIRTLINGTON GOLF CLUB	NORTH OXFORD GOLF CLUB	TADMARTON HEATH GOLF CLUB	RYE HILL GOLF CLUB
1: Relaxed Members	2408	2642	7537	1701	1894
2: Older Traditionalists	2192	2560	6954	1477	1658
3: Younger Traditionalists	2343	2399	7306	1698	1886
4: Younger Fanatics	2355	2823	7588	1553	1748
5: Younger Actives	2335	2583	7333	1634	1822
6: Late Enthusiasts	2280	2700	7263	1525	1713
7: Occasional Time Pressed	2348	2522	7368	1663	1853
8: Social Couples	2253	2566	7044	1561	1744
9: Casual Fun	2411	3070	7863	1528	1729



Profile Name	Average Number of People per Affiliated Facility (within 20-minute drive time*)				
	<u>Affiliated Club</u>	<u>Affiliated Club</u>			
	BICESTER HOTEL, GOLF AND SPA	STUDLEY WOOD GOLF CLUB			
1: Relaxed Members	2470	1963			
2: Older Traditionalists	2365	1835			
3: Younger Traditionalists	2243	1887			
4: Younger Fanatics	2592	2030			
5: Younger Actives	2406	1915			
6: Late Enthusiasts	2493	1925			
7: Occasional Time Pressed	2350	1918			
8: Social Couples	2396	1837			
9: Casual Fun	2805	2132			



Also within an approximate 20 minute drivetime from Bicester HGS are facilities from the following local authorities:

South Oxfordshire

Profile Name	Average Number of People per Affiliated Facility (within 20-minute drive time*)				
	<u>Affiliated Club</u>	<u>Affiliated Club</u>			
	WATERSTOCK GOLF CLUB	THE OXFORDSHIRE GOLF CLUB			
1: Relaxed Members	7174	2742			
2: Older Traditionalists	6657	2728			
3: Younger Traditionalists	6967	2542			
4: Younger Fanatics	7285	3089			
5: Younger Actives	6993	2711			
6: Late Enthusiasts	6952	2884			
7: Occasional Time Pressed	7030	2671			
8: Social Couples	6705	2633			
9: Casual Fun	7561	3375			



Aylesbury Vale

Profile Name	Average Number of People per Affiliated Facility (within 20-minute drive time*)				
	<u>Affiliated Club</u>				
	BUCKINGHAM GOLF CLUB				
1: Relaxed Members	2783				
2: Older Traditionalists	2680				
3: Younger Traditionalists	2528				
4: Younger Fanatics	2948				
5: Younger Actives	2716				
6: Late Enthusiasts	2826				
7: Occasional Time Pressed	2653				
8: Social Couples	2700				
9: Casual Fun	3197				



Vale of White Horse

Profile Name	Average Number of People per Affiliated Facility (within 20-minute drive time*)				
	<u>Affiliated Club</u>				
	HINKSEY HEIGHTS GOLF CLUB				
1: Relaxed Members	8106				
2: Older Traditionalists	7538				
3: Younger Traditionalists	7841				
4: Younger Fanatics	8255				
5: Younger Actives	7902				
6: Late Enthusiasts	7878				
7: Occasional Time Pressed	7931				
8: Social Couples	7592				
9: Casual Fun	8594				



In addition, the table below provides the most recent affiliated membership numbers along with some commentary from the local Club Support Officer and/or Regional Manager;

Affiliated Club Name	2015 Numbers	2016 Numbers	2017 Numbers	2018 Numbers
KIRTLINGTON GOLF CLUB	292	352	380	389
NORTH OXFORD GOLF CLUB	424	475	417	441
TADMARTON HEATH GOLF CLUB	515	548	562	552
RYE HILL GOLF CLUB	39	-	93	140
BICESTER HOTEL, GOLF AND SPA	317	328	281	252
STUDLEY WOOD GOLF CLUB	580	490	455	409
WATERSTOCK GOLF CLUB	128	119	117	114
THE OXFORDSHIRE GOLF CLUB	321	304	387	375
BUCKINGHAM GOLF CLUB	635	565	554	728
HINKSEY HEIGHTS GOLF CLUB	204	156	117	74



The Local Picture

Facility Provision & Prices:

Affiliated Club Name	Number of Holes	Driving Range Y/N	Driving Range Bays	Green fees weekday	Green fees weekend	7 Day membership fees
KIRTLINGTON GOLF CLUB	27	Y	8	£32	£40	£1,125
NORTH OXFORD GOLF CLUB	18	N	NA	£30	£30	£1195
TADMARTON HEATH GOLF CLUB	18	Y	4 + Outdoor grass bays	£40	£50	£1,242 (£1000 Joining Fee)
RYE HILL GOLF CLUB	18 + Par 3 Academy	Y	5	£25	£30	£995
BICESTER HOTEL, GOLF AND SPA	18	Y	6	£35	£35	£1,199
STUDLEY WOOD GOLF CLUB	18	Y	15	£40	£40	£1236 (+VAT)
HILLSIDE FARM GOLF DRIVING RANGE	0	Y	16	NA	NA	NA
WATERSTOCK GOLF CLUB	18	Y	22	£30	£30	£980
THE OXFORDSHIRE GOLF CLUB	18	Y	14	£60	£80	£2,050
BUCKINGHAM GOLF CLUB	18	Y	10	£30	£40	£1,301
HINKSEY HEIGHTS GOLF CLUB	18	N	NA	£22	£28	£825

Hillside Farm Golf Driving Range is a 15-bay covered driving range facility, it is not attached to any golf course. The facility is open to the public. This facility is not affiliated to England Golf and have not engaged.

Kirtlington Golf Club is a proprietary golf facility with an 18-hole golf course and a 9-hole short golf course. The facility also includes an eight-bay driving range, with additional grass tees and a teaching bay, a pro shop, coaching and a clubhouse that offers catering and function room hire, all these facilities are available to the public. The club have engaged with England Golf with regards to handicapping, Covid-19 safe opening compliance and Safeguarding.

North Oxford Golf Club is a proprietary golf facility with an 18-hole golf course. The facility also includes a pro shop and a clubhouse that serves food. The facilities at the club are open to the public. The club have engaged with England Golf with regards to



handicapping, Covid-19 safe opening compliance and Safeguarding.

Tadmarton Heath Golf Club is a private members golf facility with an 18-hole golf course, 4-bay covered driving range, pro shop and clubhouse that serves food. The club is open to visitors. The club have engaged with England Golf with regards to governance, equality, handicapping, Covid-19 safe opening compliance and Safeguarding.

Rye Hill Golf Club is a proprietary golf facility with an 18-hole golf course. The facility also includes a pro shop, an academy course for practice and a clubhouse that serves food and allows for the hosting of functions. The facility is open to the public. The club have engaged with England Golf with regards to handicapping, Covid-19 safe opening compliance and Safeguarding.

Bicester Hotel, Golf and Spa is a proprietary golf facility with an 18-hole golf course. The facility also includes a hotel, spa and multiple eateries, as well as offering golf tuition and equipment rental. All the facilities are open to the public. The club have engaged with England Golf with regards to handicapping.

Studley Wood Golf Club is a proprietary golf facility with an 18-hole golf course. The facility also includes a pro shop, clubhouse that serves food, golf tuition and a covered 15 bay driving range which are open to the public. The club have engaged with England Golf with regards to handicapping, Covid-19 safe opening compliance and Safeguarding.

Waterstock Golf Club is a proprietary owned facility with an 18 hole golf course. It also hosts a clubhouse that serves food, a covered driving range, pro shop and golf tuition, all of which is open to the public. The club have engaged with England Golf with regards to handicapping, Covid-19 safe opening compliance and Safeguarding. The club were recently awarded funding via the R&A Covid-19 Support Fund, which will be used towards a project that promotes business sustainability.

The Oxfordshire Golf Club is a proprietary owned facility with an 18 hole golf course and a 50-room hotel that includes a spa, dining rooms and conference facilities. The facility also provides a golf shop, covered driving range and short-game practice areas. The facility is open to the public. The club have engaged with England Golf with regards to handicapping, Covid-19 safe opening compliance and Safeguarding.

Buckingham Golf Club is a member run facility with an 18 hole golf course, a clubhouse that can host functions, a driving range and pro shop. The facility is open to the public. The club have engaged with England Golf with regards to club governance and staffing structure, handicapping, Covid-19 safe opening compliance and Safeguarding.

Hinksey Heights Golf Club is a proprietary owned facility that has an 18 hole golf course, a foot golf course, rugby golf course and a nature trail. The facility also has a golf shop, a clubhouse that serves food and is open to the public. The club have engaged with England Golf with regards to handicapping, Covid-19 safe opening compliance and Safeguarding.



Conclusion

Our work around mapping demand and supply, and the need for improved market understanding is all about supporting clubs to ensure they retain their existing members and players as well as capitalise on untapped demand. Customer focus is critical to this success, which very much aligns to England Golf's refreshed strategy 'Growing the Game of Golf in England 2017-2020'.

A more detailed description of the different customer profiles can be found within the 'Understanding Your Market' resource that accompanies this report. The 9 golfing profiles are designed to illustrate the wants and needs of different customers and are intended as a guide for clubs to assist with tailoring their initiatives and approach and are not meant to be a commentary on any golf club or facility.

Within the identified region there is a relatively low demand for golf when compared to the average for the South East region. The demand is split evenly over the 9 golfing profiles, both club-based and independent. There is a high level of golf provision within the area in comparison to the demand, with a good number of traditional 18-hole courses. There is only one stand-alone 9-hole course (Kirtlington GC). There is also a good number of practice facilities that are open to the public, including one stand-alone facility. Based on our initial analysis, most clubs are proactively targeting new audiences through coaching programmes and a wider range of membership options, which we will continue to support and encourage.

Membership numbers are mixed when compared with the national average, with two clubs (Tadmarton Heath Golf Club & Buckingham Golf Club) above the national average of 484 members and one club (Studley Wood Golf Club) matching the average exactly. All the other clubs falling below the average. It is worth noting that each club will have a different financial model in terms of income generation from membership vs green fees etc.

We know that clubs showing growth are developing new income streams and catering for a wide range of needs, so there is clearly scope for clubs to offer additional non-traditional and flexible playing opportunities wherever appropriate. As each club/facility has its own USP and place in the market, there may also be further opportunities for some clubs to work more collaboratively in terms of creating pathways where appropriate and collectively cater for the needs of all golfing profiles.

Further analysis at club or facility level, along with some additional England Golf tools can be used to better understand the existing members and visitors of each venue. This in turn may help to establish a clearer picture of the overall facility landscape and how well it



caters for the local demographic. We believe success is reliant upon utilising a combination of the customer profiles, the mapping tool and local knowledge and experience.

Appendix 4 – Extract from Golfbreaks – Top 10 Best golf resorts in the UK'

Bicester Hotel, Golf & Spa

The [Bicester Hotel](#) is a privately-owned and family-run accommodation. All guests benefit from the wide range of facilities including fitness centre, pool and spa area, tennis courts, lounge bar and restaurant. A testing 6,225 yard, par 71 course covering 134 acres of beautiful [Oxfordshire](#) countryside.

"We were on our 36th annual short golf break and this hotel provided us with the perfect venue, and staff who were first class." – Barry, Orpington

Source - [Best Golf Resorts in the UK](#) | [Customer Ranked](#) | [Voted by You](#) ([golfbreaks.com](#))



Appendix 5 – Extracts from Bicester Hotel Ltd’s 2017, 2018 and 2019 Company Accounts

Bicester Hotel Ltd (Registered number: 05997594)

Strategic Report
for the Year Ended 31 October 2019

The directors present their strategic report for the year ended 31 October 2019.

REVIEW OF BUSINESS

The company enjoyed a strong performance in the year with turnover well ahead of the previous year and operating profit ahead also. The business has continued to position itself as a leader in the local market in all sectors. Occupancy levels have remained strong, again improving over the previous year, but more impressive was the growth in average rate, the combination of the two resulting in a significant increase in RevPar. Golf subscriptions have again followed national trends with a continued decrease in membership numbers but the contribution from the golf operation has improved due to other revenue streams and greater efficiency. The Health Club performance saw an increase in membership numbers and turnover, and with a consistent cost base profit has improved as a result. The development of the new 'Performance Centre, at the resort is well under way with a spring 2020 opening date expected, this will bring with it some unique facilities and substantial opportunity to grow the health club business significantly.

An increase in the National Living Wage was absorbed within an overall reduced payroll spend, compared to the previous year. This saving, along with other operational cost reduction initiatives, resulted in a net profit for the year of £352,873, a significant increase over the year ended October 2018.

PRINCIPAL RISKS AND UNCERTAINTIES

The principle risks to the business are expected to be the economy, local competition and employment. There remains an element of uncertainty with regards performance within the hospitality industry, especially as a result of the Covid-19 pandemic which at the time of writing is having a significant impact on the sector as hotels, bars, restaurants and leisure facilities have all had to close down as part of a government strategy to mitigate the effect and limit the spread of the virus. On 23rd March the business closed its doors and it is expected that it will remain closed until July 2020, except for Golf which was allowed to re-open and continues to thrive. Social distancing measures and other restrictions on operations are anticipated to be in place when the hotel and leisure facilities re-open which will have a further impact on revenues, however thanks to various initiatives by the government the revenue shortfall will be partially offset by savings elsewhere.

The local area enjoys a low unemployment rate which already puts pressure on recruitment processes. As we move through the transitional period, Brexit will bring with it further challenges in this respect and a strategy to improve staff retention and reduce the need for recruitment is in place. The staff is seen as a major asset to the business which is set to be protected through improved, ongoing training and development.

There are plans for further increases in the number of bedrooms available in the local area, with a national chain recently starting the construction of a new hotel. We are confident that the demand will increase in line with the additional supply as Bicester continues to grow rapidly, with significant investment projected in both local housing and industry. Additional facilities are due to be added to the resort in order to ensure that market share is at least retained.

Bicester Hotel Ltd

Strategic Report
for the Year Ended 31 October 2018

The directors present their strategic report for the year ended 31 October 2018.

REVIEW OF BUSINESS

The company saw a slight reduction in turnover over the previous year yet increased profitability through greater efficiency. The local rooms market had levelled out during the year following the introduction of additional rooms to the area in the previous period and that allowed the company to re-establish itself as a leader in the local market. Occupancy levels have recovered, and with a growth too in average rate, RevPar has increased. Golf subscriptions have followed national trends, with a continued decrease in membership numbers, however additional income from other golf segments have partially compensated for this and the contribution from golf operations has increased tremendously. The Health Club performance was comparable with last year with both sales and contribution seeing little change. However there are significant development plans for the coming year in this area which will see the offering greatly improved with some very unique facilities.

An increase in the National Living Wage was absorbed within an overall reduced payroll spend, compared to the previous year. This saving, along with other operational cost reduction initiatives, resulted in a net profit for the year of £264,860, a significant increase over the year ended October 2017 despite the reduced turnover.

PRINCIPAL RISKS AND UNCERTAINTIES

The principle risks to the business are expected to be the economy, local competition and employment. There remains an element of uncertainty with regards performance within the hospitality sector.

The local area enjoys a low unemployment rate which already puts pressure on recruitment. Brexit will bring with it further challenges in this respect and a strategy to improve staff retention and reduce the need for recruitment is in place. The staff are seen as a major asset which is set to be protected through improved, ongoing training and development.

There are plans for further increases in the number of bedrooms available in the local area, with a national chain recently announcing a new venture. We are confident that the demand will increase in line with the additional supply as Bicester continues to grow rapidly, with significant investment projected in both local housing and industry. Additional facilities are due to be added to the resort in order to ensure that market share is at least retained.

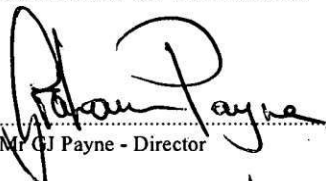
ANALYSIS USING FINANCIAL KEY PERFORMANCE INDICATORS

Room occupancy for the year increased from 82.0% to 82.7% and average rate increased by 0.6% from £99.49 to £100.09. RevPar was ahead over the previous year, £82.81 from £81.54, because of the increase in accommodation revenue whilst TrevPar was down from £267.54 to £262.96 because total revenue has decreased.

POSITION AT YEAR END

Net assets as at the year-end have increased over the previous period end and the company has seen a significant improvement in its forecasted cash flow position. Finance lease debt due after one year is falling as liabilities are repaid.

ON BEHALF OF THE BOARD:


.....
Mr GJ Payne - Director

Date: 24 April 2019

Bicester Hotel Ltd (Registered number: 05997594)

Strategic Report
for the Year Ended 31 October 2017

The directors present their strategic report for the year ended 31 October 2017.

REVIEW OF BUSINESS

The company saw a significant drop in turnover over the previous year but this was due largely to the closure of The Oxfordshire Inn, a second property operated by the company throughout the course the prior year but which closed in December 2016. The closure of the Oxfordshire Inn contributed a reduction in turnover of £498k although, with much lower margins than the principle site, this had a much lesser effect on the overall profitability. A recent increase in the supply of rooms in the local area impacted rooms occupancy marginally, but growth in average rate compensated for this with RevPar only slightly behind last year. Golf subscriptions have followed national trends, with a decrease in the number of members, however additional income from other golf segments have partially compensated for this and are expected to generate further growth in the future. The Health Club performance was comparable with last year with an overall increase in membership numbers, although the average membership price was reduced due to the mix of categories sold.

An increase in the National Living Wage was absorbed within an overall reduced payroll spend, compared to the previous year. This saving, along with other operational cost reduction initiatives, resulted in a net profit for the year of £154,121, an increase over the year ended October 2016 despite the reduced turnover.

At the end of the financial year, the parent company successfully completed a refinancing exercise, resulting in a reduction in group financing obligations which will in turn greatly improve the cash flow performance for the company.

PRINCIPAL RISKS AND UNCERTAINTIES

The principle risks to the business are expected to be the economy, local competition and employment. There remains an element of uncertainty with regards performance within the hospitality sector.

The local area enjoys a low unemployment rate which already puts pressure on recruitment. Brexit will bring with it further challenges in this respect and a strategy to improve staff retention and reduce the need for recruitment is in place. The staff are seen as a major asset which is set to be protected through improved, ongoing training and development.

There are plans for further increases in the number of bedrooms available in the local area, with a national chain recently announcing a new venture. We are confident that the demand will increase in line with the additional supply as Bicester continues to grow rapidly, with significant investment in both local housing and industry. Additional facilities are due to be added to the resort in order to ensure that market share is at least retained.


ANALYSIS USING FINANCIAL KEY PERFORMANCE INDICATORS

Room occupancy for the year dropped from 83.9% to 82.0% and average rate increased by 2% from £97.57 to £99.49. RevPar was slightly down, year on year, from £81.88 to £81.54 and TrevPar was down from £270.62 to £261.84.

POSITION AT YEAR END

Net assets as at the year end have increased over the previous period end and the company has seen a significant improvement in its cash balances. Changes in debtors and creditors reflect the refinancing of the group to enable hotel development and expansion. Finance lease debt due after one year is falling as liabilities are repaid.

ON BEHALF OF THE BOARD:


.....
Mr GJ Payne - Director

Date: 22/06/2018

Appendix 6 – Google Maps drive time from BGHS to local courses

This screenshot shows a Google Maps interface with a route from Bicester Golf Club to Hinksey Heights Golf Club. The route is highlighted in blue and passes through Oxford. The estimated drive time is 21 minutes for a distance of 15.4 miles. The left sidebar shows the starting point as Bicester Golf Club, Green Ln, Chesterton, and the destination as Hinksey Heights Golf Club, Southern B. The route is labeled 'via A34' and is noted as the fastest route, though it has restricted usage or includes private roads. The map shows various landmarks and roads in the area, including the M40 and A34.

Route	Drive Time	Distance
via A34	21 min	15.4 miles

This screenshot shows a Google Maps interface with a route from Bicester Golf Club to Waterstock Golf Club & Driving Range. The route is highlighted in blue and passes through Oxford. The estimated drive time is 20 minutes for a distance of 15.5 miles. The left sidebar shows the starting point as Bicester Golf Club, Green Ln, Chesterton, and the destination as Waterstock Golf Club & Driving Range. The route is labeled 'via M40' and is noted as the fastest route, though it has restricted usage or includes private roads. The map shows various landmarks and roads in the area, including the M40 and A34.

Route	Drive Time	Distance
via M40	20 min	15.5 miles
via B4027	28 min	16.8 miles

Browser tabs: Inbox, UPT G..., Plannin..., Decisic..., Investr..., Letter..., Englan..., aa rou..., google..., Biceste...

URL: <https://www.google.co.uk/maps/dir/Bicester+Golf+Club,+Green+Lane,+Chesterton,+Bicester/The+Oxf...>

Navigation icons: Car, Bus, Walking, Bicycle, Plane

Destination list:

- Bicester Golf Club, Green Ln, Chesterto...
- The Oxfordshire Golf Hotel and Spa, Ry...
- Add destination

Leave now

Send directions to your phone

via M40

- Fastest route
- 19.6 miles
- 27 min
- This route has restricted usage or includes private roads.

via B4027

- 20.9 miles
- 34 min

Explore The Oxfordshire Golf Hotel and Spa

Map data ©2021 United Kingdom

System tray: 20:41 09/01/2021

Browser tabs: Inbox, UPT G..., Plannin..., Decisic..., Investr..., Letter..., Englan..., aa rou..., google..., Biceste...

URL: <https://www.google.co.uk/maps/dir/Bicester+Golf+Club,+Green+Lane,+Chesterton,+Bicester/Buckingham...>

Navigation icons: Car, Bus, Walking, Bicycle, Plane

Destination list:

- Bicester Golf Club, Green Ln, Chesterto...
- Buckingham Golf Club, Tingewick Rd, B...
- Add destination

Leave now

Send directions to your phone

via A4095 and A4421

- Fastest route, the usual traffic
- 11.8 miles
- 19 min
- This route has restricted usage or includes private roads.

via A43 and A421

- 16.0 miles
- 22 min

Explore Buckingham Golf Club

Map data ©2021 United Kingdom

System tray: 20:44 09/01/2021