



Proposed Great Wolf Lodge,
Chesterton, Bicester

Highways and Transport Evidence
on behalf of Great Lakes UK Limited

of

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TEXT

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1.0 Introduction – Qualifications and Experience

- 1.1 I hold a First Class Bachelor of Engineering Degree in Civil Engineering and a Royal Society for the Prevention of Accidents (RoSPA) accreditation in advanced road safety engineering. I am a member of the Institute of Logistics and Transport and of the Chartered Institution of Highways and Transportation. I have over 30 years' experience in the field of transportation planning, traffic engineering and highway safety.
- 1.2 I have extensive experience of highways and transport planning for the leisure and commercial sectors and have acted in relation to major leisure and tourism schemes including various projects for Merlin (Thorpe Park and Legoland) and SnOasis, a substantial holiday resort comprising a ski centre, entertainment dome, a range of sporting facilities, retail facilities and restaurants. I have extensive local experience and have acted on behalf of Scenic Land Developments Limited in relation to the development of a 60,000 square metre office park adjacent to the A41 Oxford Road in Bicester and am currently acting for Value Retail in relation to Bicester Village Outlet Centre.
- 1.3 My experience includes a period in the Development Studies Department of Wootton Jeffreys Consultants. Subsequently, I worked for Mayer Brown for over 14 years. I was jointly responsible for setting up Motion Consultants Limited in August 2004.
- 1.4 Motion specialises in advising developers and professionals in the development field on all matters concerning transportation, highways, traffic and road safety and our clients comprise a wide variety of private and public-sector organisations.

Scope of Evidence

- 1.5 My evidence is provided on behalf of Great Lakes UK Limited, the 'Appellant'.
- 1.6 The Appellant submitted a planning application to Cherwell District Council (CDC) in November 2019 (Planning Application Ref: 19/02550/F) for development proposals comprising:
- "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."*
- 1.7 Planning permission was refused by CDC following a planning committee meeting in March 2020. The Decision Notice in relation to the refusal of planning permission lists six reasons for refusal. I consider that two of those reasons for refusal relate to highways and transport matters as follows:
- ▶ Reason 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.
 - ▶ Reason 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.

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- 1.8 I consider each of the reasons for refusal in the following sections of my evidence where I demonstrate that the Proposed Development is accessible by a range of sustainable modes of travel and offers genuine choices of alternative modes of travel to the private car and therefore accords with the principles of sustainable development in highways and transport terms. Furthermore, my evidence demonstrates that the effect of vehicle trips associated with the Proposed Development can be safely and suitably accommodated on the highway network local to the Site. In addition, the Proposed Development will not result in any severe residual impact on the highway network and is therefore, in accordance with the NPPF.
- 1.9 On the basis of my evidence, I am of the professional opinion that the Proposed Development accords with the Cherwell District Council Local Plan and the National Planning Policy Framework and therefore should not have been refused on highways or transport grounds.

2.0 Planning Policy

2.1 The key policy and guidance documents that set the context for the Proposed Development comprise the:

- ▶ Cherwell Local Plan 2011-2031 Part 1 (December 2016);
- ▶ Saved Policies of 1996 Cherwell Local Plan (Saved September 2007);
- ▶ Oxfordshire Local Transport Plan 4 (2016);
- ▶ National Planning Policy Framework (June 2019); and,
- ▶ National Planning Practice Guidance (March 2012).

Cherwell Local Plan 2011-2031 (December 2016)

2.2 The Cherwell Local Plan is the main part of the adopted development plan, and so the source of key planning policy for the district. It sets out the overarching planning policies against which planning applications will be determined.

2.3 Policy SLE 3 considers transport and tourism growth stating that:

"The Council will support proposals for new or improved tourist facilities in sustainable locations, where they accord with other policies in the plan, to increase overnight stays and visitor numbers within the District."

2.4 Policy SLE 4 considers transport and connections and states:

"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. Encouragement will be given to solutions which support reductions in greenhouse gas emissions and reduce congestion. Development which is not suitable for the roads that serve the development and which have a severe traffic impact will not be supported."

2.5 Policy ESD 1 considers development and its potential effect on climate change stating:

"Measures will be taken to mitigate the impact of development within the District on climate change. At a strategic level, this will include:

- ▶ *Distributing growth to the most sustainable locations as defined in this Local Plan;*
- ▶ *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;*
- ▶ *Designing developments to reduce carbon emissions and use resources more efficiently, including water (see Policy ESD 3 Sustainable Construction); and,*
- ▶ *Promoting the use of decentralised and renewable or low carbon energy where appropriate (see Policies ESD 4 Decentralised Energy Systems and ESD 5 Renewable Energy).*

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).*

Adaptation through design approaches will be considered in more locally specific detail in the in the Sustainable Buildings in Cherwell Supplementary Planning Document (SPD)."

Saved Policies of 1996 Local Plan (Saved September 2007)

- 2.6 Whilst largely superseded by the current Local Plan (2016), several policies from the 1996 Local Plan were saved in 2007 and continue to be referenced in planning decisions by CDC.

- 2.7 Policy TR5 relates the design of on-site parking and servicing areas and states that:

"Development likely to attract vehicular traffic will normally be required to:

- i. Accommodate within the site the necessary highway safety requirements relating to access, turning, servicing and parking provision; and*
- ii. Include appropriate measures to minimise the visual impact of vehicles and any parking areas."*

- 2.8 Policy TR7 considers the effect of developments on minor roads and states that:

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

Oxfordshire Local Transport Plan

- 2.9 The Oxfordshire Local Transport Plan (LTP4) sets out OCC's policy and strategy for developing the transport system in Oxfordshire to 2031.

- 2.10 In relation to the location of development and improvements to infrastructure, Policy 17 of the LTP4 states:

"Oxfordshire County Council will seek to ensure through cooperation with the districts and city councils, that the location of development makes the best use of existing and planned infrastructure, provides new or improved infrastructure and reduces the need to travel and supports walking, cycling and public transport."

National Planning Policy Framework

- 2.11 The National Planning Policy Framework (NPPF) February 2019 sets out the Government's planning policies for England and how they are expected to be applied and is an important material consideration.

- 2.12 In relation to the rural economy the NPPF states at Paragraph 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"*

2.13 In addition, Paragraph 84 of the NPPF states:

“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.”

2.14 The NPPF presumes in favour of sustainable development and at Paragraph 102 states:

“Transport issues should be considered from the earliest stages of plan-making and Development Proposals, so that:

- a) the potential impacts of development on transport networks can be addressed;*
- b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;*
- c) opportunities to promote walking, cycling and public transport use are identified and pursued;*
- d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.”*

2.15 In relation to the location of development, providing a choice of transport modes and the variation between urban and rural sites, the NPPF states at Paragraph 103 that:

“The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.”

2.16 In relation to parking provision is Paragraph 105 of the NPPF states:

“If setting local parking standards for residential and non-residential development, policies should take into account:

- a) the accessibility of the development;*
- b) the type, mix and use of development;*
- c) the availability of and opportunities for public transport;*
- d) local car ownership levels; and*
- e) the need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles.”*

2.17 Paragraph 108 of the NPPF details of how the assessment of development proposals should be considered and states:

“In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

- a) *appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;*
- b) *safe and suitable access to the site can be achieved for all users; and*
- c) *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.”*

2.18 “Sustainable transport modes” is a term defined in Annex 2: Glossary to the NPPF as follows:

“Sustainable transport modes: Any efficient, safe and accessible means of transport with overall low impact on the environment, including walking and cycling, low and ultra low emission vehicles, car sharing and public transport.”

2.19 Paragraph 109 of the NPPF details the circumstances in which a local authority should resist or refuse a development proposal on highways grounds and 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.”

2.20 Paragraph 110 of the NPPF details how development proposal should be designed to facilitate access and states:

“Within this context, applications for development should:

- a) *give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;*
- b) *address the needs of people with disabilities and reduced mobility in relation to all modes of transport;*
- c) *create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;*
- d) *allow for the efficient delivery of goods, and access by service and emergency vehicles; and,*
- e) *be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.”*

2.21 In relation to the assessment required to support and justify a development proposal, Paragraph 111 of the NPPF states:

“All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed.”

National Planning Practice Guidance

2.22 National Planning Practice Guidance ‘Travel Plans, Transport Assessments and Statements’ provides advice on when Transport Assessment and Transport Statements are required, and what they should contain.

2.23 Paragraph 004 of the above Guidance states as follows:

“Transport Assessments and Statements are ways of assessing the potential transport impacts of developments (and they may propose mitigation measures to promote sustainable development. Where that mitigation relates to matters that can be addressed by management measures, the mitigation may inform the preparation of Travel Plans).

Transport Assessments are thorough assessments of the transport implications of development, and Transport Statements are a 'lighter-touch' evaluation to be used where this would be more proportionate to the potential impact of the development (ie in the case of developments with anticipated limited transport impacts).

Where the transport impacts of development are not significant, it may be that no Transport Assessment or Statement or Travel Plan is required. Local planning authorities, developers, relevant transport authorities, and neighbourhood planning organisations should agree what evaluation is needed in each instance."

- 2.24 Paragraph 005 of the Planning Practice Guidance details the relationship between Transport Assessments, Statements and Travel Plans and how this relates to the residual impact of development and states:

"The development of Travel Plans and Transport Assessments or Transport Statements should be an iterative process as each may influence the other.

The primary purpose of a Travel Plan is to identify opportunities for the effective promotion and delivery of sustainable transport initiatives eg walking, cycling, public transport and tele-commuting, in connection with both proposed and existing developments and through this to thereby reduce the demand for travel by less sustainable modes. As noted above, though, they should not be used as way of unfairly penalising drivers.

Transport Assessments and Transport Statements primarily focus on evaluating the potential transport impacts of a development proposal. (They may consider those impacts net of any reductions likely to arise from the implementation of a Travel Plan, though producing a Travel Plan is not always required.) The Transport Assessment or Transport Statement may propose mitigation measures where these are necessary to avoid unacceptable or "severe" impacts. Travel Plans can play an effective role in taking forward those mitigation measures which relate to on-going occupation and operation of the development."

Summary

- 2.25 It is evident that the policies set out within the NPPF, Oxfordshire County Council's Local Transport Plan and the Cherwell Local Plan reflect a presumption in favour of sustainable development and require major development to be focused on sites which are sustainable, or can be made sustainable through improvements to transport infrastructure. Furthermore, the planning framework confirms that development should only be resisted or refused on transport grounds where there would be an unacceptable impact on highway safety or the residual impacts of development are severe.

3.0 Reason for Refusal 2: Sustainable Transport

- 3.1 Reason for Refusal 2 of the Decision Notice relates to the sustainability of the Proposed Development in transport terms and the choice of travel modes available for future staff and guests of the Site and states:

"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."

- 3.2 In transport terms I consider that the two primary allegations made in respect of the sustainability of the Proposed Development within the reason for refusal are as follows:

- ▶ The Proposed Development is *"in a geographically unsustainable location ... 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"*; and,
- ▶ For the Proposed Development *"the majority of trips are likely to be made via private motor vehicle, utilising minor rural roads"*.

- 3.3 My evidence addresses each of these allegations in turn and I demonstrate that the Proposed Development is in a sustainable location and will in fact provide a comprehensive package of sustainable transport improvements, which will reduce the need to travel and provide a genuine choice in modes of travel for future staff and guests at the Site. In addition, my evidence demonstrates that the Proposed Development will not result in a significant number of private motor vehicles using minor rural roads in the vicinity of the Site. My evidence demonstrates that the Proposed Development accords with the principles of the NPPF and the Cherwell Local Plan.

Reducing the Need to Travel and Offering a Genuine Choice of Alternative Travel Modes

Providing a Genuine Choice of Alternative Travel Modes

- 3.4 This section of my evidence will demonstrate how the Proposed Development is in a sustainable location which provides future staff and guests with a genuine choice of alternative travel modes to the private car and should be read in conjunction with evidence on planning matters provided by Chris Goddard of DP9.

- 3.5 As noted above, the NPPF defines "sustainable transport modes" of travel as follows:

"Any efficient, safe and accessible means of transport with overall low impact on the environment, including walking and cycling, low and ultra low emission vehicles, car sharing and public transport"

- 3.6 Tourism and leisure destinations, by their very nature, involve discretionary trips which inevitably result in the need for people to travel to that area as a visitor or guest. This is considered an intrinsic part of any tourism or leisure destination. Visitors will therefore need to travel to the Site and this will be by car and by other modes. The sustainable location of the Site, centrally located in the UK and close to the strategic network, is accessible for families likely to be car sharing and able to use electric vehicles and is also accessible to railway facilities to offer a genuine choice of modes of travel.

- 3.7 In respect of transport sustainability, Paragraph 103 of the NPPF states that:
- “significant development should be focused on locations which are or can be made sustainable”.*
- 3.8 The sustainability in transport terms of this as a tourist/leisure destination is something that is fully addressed by the Proposed Development, which will make the location sustainable in transport terms. A comprehensive package of sustainable transport improvements has been developed and agreed with Highways Officers at OCC as part of this Proposed Development. Moreover, I note that OCC as the Local Highway Authority did not raise an objection to the Proposed Development on accessibility or sustainable transport grounds in light of this.
- 3.9 As noted in Section 2 of my evidence, Policy SLE 3 considers transport and tourism growth stating that:
- “The Council will support proposals for new or improved tourist facilities in sustainable locations, where they accord with other policies in the plan, to increase overnight stays and visitor numbers within the District.”*
- 3.10 Policy SLE3 of the Cherwell Local Plan provides clear support for the Proposed Development as a new tourist facility which will inevitably increase overnight stays and visitor numbers within the District. The Site was chosen by the Appellant, in part, because of its ideal strategic location on the M40. This gives it ready access to an extensive catchment which it would serve and paragraph B.64 of the Cherwell Local Plan highlights that *“1.2 million people live within a 30-minute drive time of the District boundary”*.
- 3.11 The location of the Site, in close proximity to a number of other complementary tourist and visitor destinations including the City of Oxford, Blenheim Palace, the Cotswolds, and Bicester Village and Bicester Heritage/Motion, enable the potential for guests undertaking linked trips between the various local destinations.
- 3.12 In the context of a tourism facility which will inevitably include visitors who will travel by car, Policy SLE3 does not attempt to define or prescribe what constitutes a sustainable location for tourism uses and this is difficult, given the inherent nature of tourism which by its nature entails discretionary travel, often over considerable distances by road and air for leisure purposes. My evidence demonstrates that the Site is genuinely accessible by alternative means of transport to the private car which makes it sustainable as a tourist/leisure destination.

Proposed Sustainable Transport Improvements

- 3.13 The Proposed Development includes a comprehensive package of sustainable transport improvements which are an integral part of the scheme. The package of measures has been discussed in detail and agreed with OCC and includes the following.
- 3.14 The package of sustainable transport improvements, agreed with OCC, includes:
- ▶ Diversion and subsequent enhancement of the existing Public Right of Way (PRoW) 161/6/10 which passes through the Site;
 - ▶ A new length of foot/cycleway along the southern side of the A4095 connecting from the Site to Chesterton;
 - ▶ A new length of footway on the southern side of the A4095 connecting from the Site to the motorway overbridge and continuing west to connect PRoW 161/6/10 with 161/11/20;
 - ▶ A new length of footway at the A4095 connection to PRoW 161/1/20 to assist pedestrians crossing between the PRoW and existing footway;
 - ▶ Two new lengths of footway on Green Lane, either side of The Hale to connect PRoW 161/6/10 with Chesterton;
 - ▶ A contribution of £70,000 to cycle improvements between the Site and Bicester;

- ▶ A S106 contribution of £1.6million to fund a new public bus service linking the Site to Bicester town centre and railway stations, in accordance with the OCC consultation response dated 10th January 2020;
 - ▶ A S106 contribution to improvements to the public bus stop in Chesterton;
 - ▶ A dedicated shuttle bus services for staff and visitors associated with the Proposed Development;
 - ▶ A contribution to a coordinated signage strategy for the Proposed Development;
 - ▶ Sustainable day passes, offering discounted day access for local residents that use sustainable modes of travel to access the Site;
 - ▶ On-site cycle parking;
 - ▶ Provision of electric vehicle charging facilities for staff and guests;
 - ▶ A Travel Plan including the appointment of a Travel Plan Coordinator, provision of travel information on the resort website, travel Welcome Packs for staff, monitoring the usage of cycle parking and electric vehicle charging, promoting car sharing and undertaking staff travel surveys to monitor travel patterns; and,
 - ▶ A Delivery and Servicing Management Plan.
- 3.15 Further details of this comprehensive package of sustainable transport improvements provided as part of the Proposed Development are set out below.

Low Emission Vehicles

- 3.16 The use of low emission vehicles also forms part of the strategy to promote sustainable travel to and from the Site in comparison with standard combustion engine motor vehicles. Low emission vehicles and ultra low emission vehicles are recognised to be sustainable transport modes in the NPPF.
- 3.17 First of all, the fleet of shuttle buses for staff and guests (dealt with below) will be made up entirely of low emissions vehicles.
- 3.18 Secondly, the Proposed Development will make provision to enable vehicles travelling to and from the Site to be low emission or ultra low emission vehicles by encouraging their use. CDC and OCC have no adopted standards in relation to the provision of charging facilities for electric vehicles. Notwithstanding the lack of local planning policy standards in this regard the NPPF refers at Paragraph 105 to “adequate provision of spaces for charging plug-in and other ultra-low emission vehicles”.
- 3.19 For those that do not take advantage of the significant public transport measures described below, the Appellant will be promoting the use of electric vehicles as a sustainable travel choice amongst both visitors and staff. From the outset, the Appellant will ensure that a minimum of 10% of on-site car parking spaces will be provided with electric charging facilities. This equates to at least 90 spaces and will immediately promote the use electric vehicles as a sustainable mode of travel to the resort.
- 3.20 In addition to the initial provision of 90 car parking spaces with active electric vehicle charging facilities present from opening of the Proposed Development, all remaining parking bays will be provided with underground ductwork to enable the future expansion of the vehicle charging system as the take up of electric vehicles increases. The Appellant is therefore ensuring that the Proposed Development is future proofed to accommodate additional electric vehicle charging facilities as and when they are required in future.
- 3.21 The Proposed Development includes a Travel Plan (see below). As part of the Travel Plan the usage of the on-site electric vehicle charging facilities and national trends in the take up of electric vehicles will be monitored. As the take-up of electric vehicles increases and usage of the on-site electric vehicle charging facilities increases in consequence of the national measures taken to increase electric car ownership (such as incentives and the ban of sales of new diesel and petrol cars from 2030), additional electric vehicle charging facilities will be provided.

Car Sharing

- 3.22 Regardless of the type of car used, guests visiting the Proposed Development are likely to be families, in particular those with young children. Families arriving at the Site will typically arrive as a group and, if arriving by car, this will comprise a car driver and a number of car passengers/ car sharers. It is envisaged that typical car occupancy of guests arriving at the Site will be in excess of 3 people per car. On that basis, for every 1 person arriving at the Site by car as a driver, at least 2 people will be arriving as a car sharer.
- 3.23 The NPPF defines car sharing as a sustainable mode of travel and car passengers arriving as a group will therefore be travelling by a sustainable mode of travel. It is evident that by the nature of guests visiting the Site a significant proportion will be car sharers.

Guest Shuttle Bus

- 3.24 In addition to a staff shuttle bus (dealt with below), a guest shuttle bus service is also proposed. This would provide a direct and convenient service between both Bicester train stations and the resort in order to provide a practical and very useable connection for guests to access the Site as an alternative to the private car. Guests staying at the resort will have an easy, readily available and convenient way of getting to the resort by public transport using the many rail services to Bicester and the dedicated guest shuttle bus to get to the resort in what will be a genuine alternative to travelling to the Site by car.
- 3.25 The utility of a guest shuttle bus service has been considered in light of the potential catchment area for most visitors. Based on information provided by the Appellant, a catchment area of a 2.5 hour journey time to the Site is considered reasonable for guest journey and this was utilised in assessing the distribution of vehicle trips associated with the Site.
- 3.26 Based on a 2.5 hour journey time catchment area to the Site for guests, it is recognised that local buses themselves are unlikely to provide a complete journey to the Site for most guests. However, it is clear that shuttle buses from and to the Site can provide a connection between the Proposed Development and train stations in order to provide a link to a much wider catchment area and one that covers the 2.5 hour journey time.
- 3.27 An assessment of the catchment for guests based on a 2.5 hour journey time has been undertaken using TRACC public transport analysis software. The assessment builds in the provision of the guest shuttle bus service to provide access between the Site and the local stations.
- 3.28 The public transport journey time analysis is presented at [Appendix A](#). It demonstrates that a 2.5 hour journey time to the Site by public transport will encompass a number of major cities and towns including London, Birmingham, Coventry and Reading. Based on analysis presented at [Appendix B](#) of my evidence, it is estimated that a population of over 10 million people reside with a 2.5-hour journey time by public transport to the Site. It is therefore evident that there is a very substantial population within a reasonable journey time of the Site by public transport, so demonstrating the very real choice that this presents and the genuine ability for a significant number of guests to travel to the Site by public transport with the shuttle bus in place.
- 3.29 On the basis of the above I consider that the proposed guest shuttle bus service provides a significant improvement to sustainable transport connectivity to the existing Site and provides a genuine choice for guests to access the Proposed Development by a non-car mode of travel, which will render the Site a sustainable destination for guests.

Staff Shuttle Bus

- 3.30 A significant proportion of staff working within the Proposed Development are expected to come from the local area, including Bicester in particular and places easily connected to Bicester. A staff shuttle bus to Bicester will provide a realistic and genuine alternative to the car for such staff to travel to and from the Site.

3.31 The Proposed Development includes proposals for such a dedicated staff shuttle bus service. This would operate between the Site and Bicester, calling at local rail stations, the town centre including the town centre bus stops and local centres around Bicester including Highfield, Woodfield and Kingsmead. A potential route of the service is presented at Figure 3.1 below.

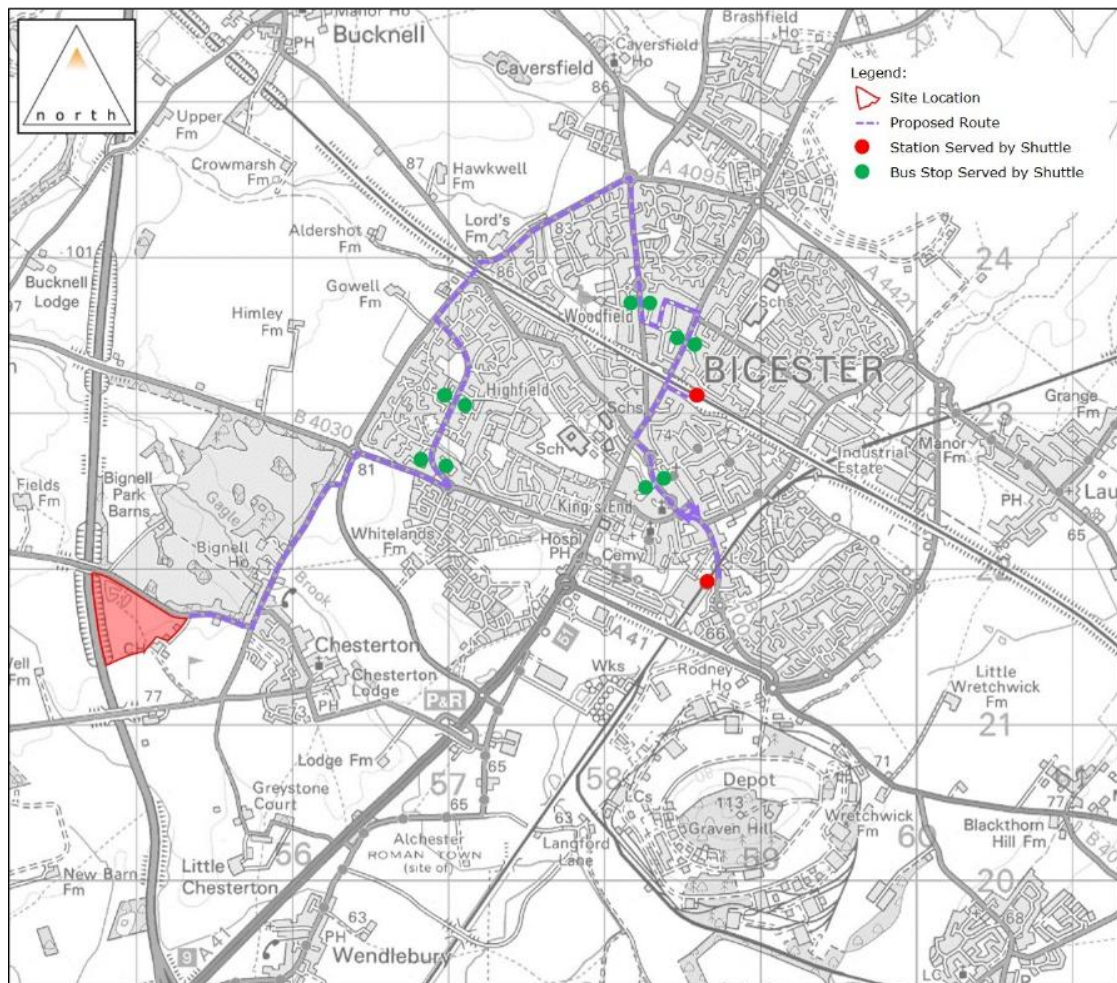


Figure 3.1 – Staff Shuttle Bus Route

3.32 By calling at the town centre bus stops the staff shuttle bus service will also provide the opportunity for staff to inter-connect with other bus services in the town. By calling at both Bicester North and Bicester Village train stations, the staff shuttle bus service would provide the opportunity for staff to inter-connect with local rail services linking to regional towns such as Oxford, Banbury, Leamington Spa, Warwick and Oxford.

3.33 One of the key benefits of having a dedicated shuttle bus service for staff is that it can be flexible to the needs of staff, both in relation to the routing and timing of the service. Staff at the Proposed Development will generally work on a shift basis and the timing of the dedicated staff shuttle bus service can therefore be planned such that the services arrive at the Site just prior to main shift start times and depart the Site just after the end of shifts. The shuttle bus service will therefore directly meet the needs of staff and minimise the time spent waiting for a service, thereby making it a very attractive option for staff. Moreover, once the Site is operational, the home location of staff can be monitored as part of the Travel Plan in order to ascertain the most beneficial route for the shuttle bus to follow. The route of the staff shuttle bus service can then be adjusted to provide access for the maximum number of staff along the route.

- 3.34 As already indicated, the fact that the staff shuttle bus service will call at the local train and bus stations, the town centre and local centres around Bicester, means that it will provide a range of pick-up and drop-off points for staff. I consider that the provision of dedicated shuttle bus services in this way is the most appropriate and beneficial method of delivering bus connectivity to the Site. The delivery of the proposed staff shuttle bus service will be secured by legal obligation.
- 3.35 I therefore consider that the proposed staff shuttle bus service provides a significant improvement to sustainable transport connectivity to the Site and it will provide a genuine choice for staff to access the Site by a non-car mode of travel and renders the Proposed Development a sustainable destination for employees.

Public Transport Improvements

- 3.36 In addition to the significant measures identified above, the Proposed Development will also deliver significant improvements to the public transport accessibility of the Site in any event through a S106 contribution of £1.6million to fund a new public bus service linking the Site to Bicester town centre and railway stations and a S106 contribution to improvements to the public bus stop in Chesterton.
- 3.37 In addition to enhancing the accessibility of the Proposed Development by public transport the provision of the new public bus service will provide a significant improvement to the sustainability of the area generally to the benefit of local residents.
- 3.38 At present the only bus stops within Chesterton are situated on Alchester Road and are served by the 21 bus service. The 21 bus service operates once a day, departing Chesterton at 07:25am on weekdays only. The 21 bus service from Chesterton operates in one direction only, towards Bicester, and there is no return bus service from Bicester to Chesterton. The 21 bus service does not operate from Chesterton on weekend days or public holidays and, on these days, there is no public bus service to or from Chesterton.
- 3.39 There is a community bus service known as the Oxfordshire 'Comet' which provides a once a day service between Chesterton and Bicester and return on Mondays only. However, the service is only available for vulnerable or disabled residents who are unable to access public transport services.
- 3.40 The new public bus service would be operated by OCC and the consultation response from OCC dated 10 January 2020 states that contribution would provide for one bus to operate a route between the Site, Chesterton, Bicester town centre and Bicester North and Bicester Village train stations. The public bus would operate 7 days a week and the response from OCC dated 3 March 2020 states *"In theory, a half-hourly service is achievable on a public bus route with one vehicle, if the most direct route was taken"*.
- 3.41 It is evident that the proposed contribution to fund a new public bus service and new bus stop facilities in Chesterton will provide a significant betterment to the accessibility of the local area to public transport services to the benefit of existing residents of Chesterton.

Walking and Cycling Improvements

- 3.42 The Proposed Development will provide extensive pedestrian improvements in the vicinity of the Site which will integrate with the existing pedestrian network around the Site and provide enhanced connectivity between existing footways and Public Rights of Way (PRoWs). The proposed pedestrian improvements connect with Chesterton, local PROWs and the wider pedestrian network.
- 3.43 Drawings 1803047-02 and 1803047-03, attached at [Appendix C](#), provide details of these pedestrian and cycling improvements around the Site. They include a new foot/cycleway along the southern side of the A4095 connecting from the Site to Chesterton.
- 3.44 The proposals also include a new length of footway on the southern side of the A4095 connecting from the Site to the motorway overbridge and continuing west to connect PRoW 161/6/10 with 161/11/20.
- 3.45 A new length of footway at the A4095 connection to PRoW 161/1/20, as shown at Drawing 1803047-08 attached at [Appendix C](#), will assist pedestrians crossing between the PRoW and existing footway.

- 3.46 The proposals also include two new lengths of footway on Green Lane, either side of The Hale. These new sections of footway are as shown at Drawing 1803047-15, attached at [Appendix C](#), and provide a connection between the southern end of PRoW 161/6/10 and the existing footway on Green Lane in Chesterton. These new sections of footway integrate the Proposed Development with existing pedestrian infrastructure south of the Site
- 3.47 The new footway along the A4095 between Chesterton, the Site, PRoW 161/6/10 and PRoW 161/11/20, along with the new footway along Green Lane, provide a significant betterment for existing pedestrians utilising these routes. The proposals provide a stretch of footway where pedestrians currently required to walk within the carriageway or grass verge. These new sections of footway therefore provide both a safety and convenience improvement for pedestrians connecting between Chesterton and PRoWs 161/6/10 and 161/11/20 and will make walking on these routes a far more practical option.
- 3.48 The improvements to pedestrian and cycle routes in the vicinity of the Site, and the connection with existing routes and rights of way, are identified at Figure 3.2 below.

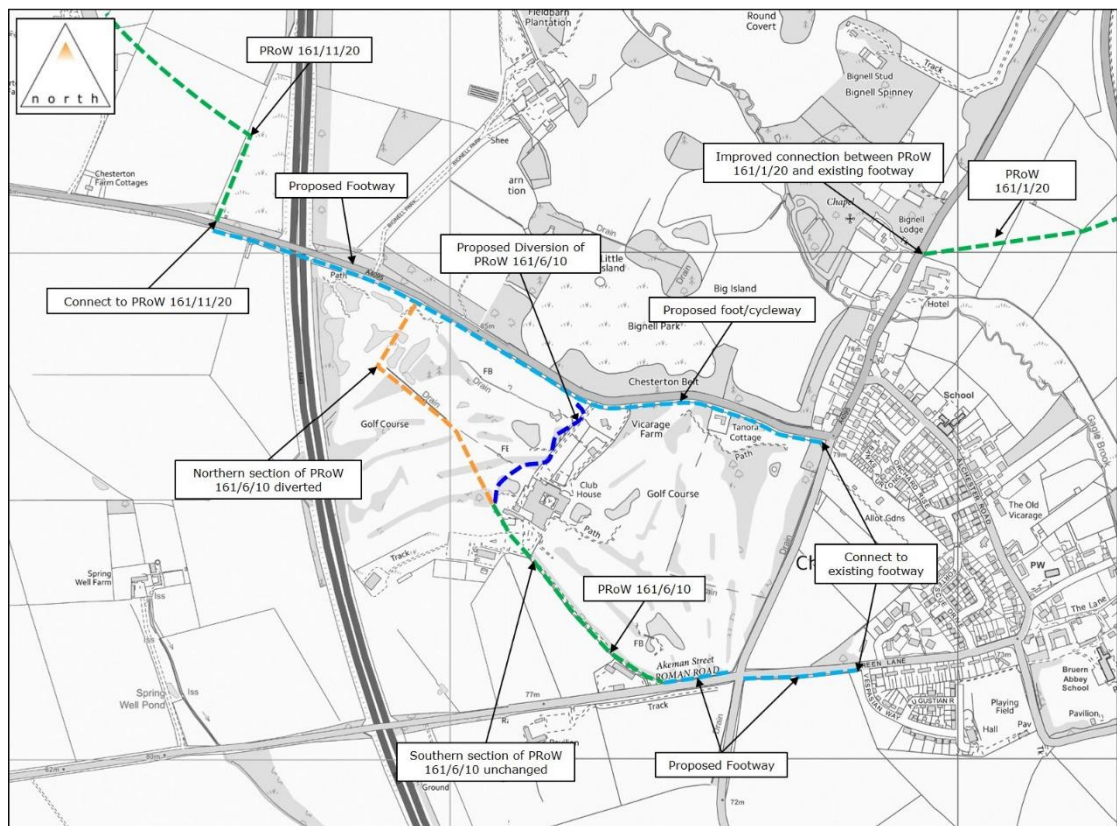


Figure 3.2 – Pedestrian and Cycle Improvements and Connections

- 3.49 OCC cycle parking standards recommend the provision of 1 cycle parking per 10 staff for hotel uses. OCC has no specific requirement for visitor cycle parking associated with hotel schemes.
- 3.50 The Proposed Development is expected to have up to 200 staff on-site at peak times. Accordingly, there is a policy requirement to provide 20 staff cycle parking spaces to accord with OCC standards. However, the Proposed Development will provide 40 staff cycle parking spaces (twice the requirement) in a secure covered cycle store, close to the staff entrance to the building. The proposed staff cycle parking provision at double the OCC minimum requirement represents a genuine commitment to encouraging such sustainable mode of travel for staff, along with a realistic assessment of the genuine ability for staff to access the Site by cycling given its location and proximity to places where employees are likely to live, such as Bicester.

- 3.51 In addition to these, a further 40 visitor cycle parking spaces will be provided within the Proposed Development in a prominent location at the front of the building, close to the main guest entrance. The visitor cycle parking can be utilised by day visitors to the Site from the local area and will also allow guests to bring bicycles to the Site and park them securely and then cycle within the local area to visit other local destinations or for leisure cycling.
- 3.52 As part of the Travel Plan, the usage of both the staff and guest cycle parking will be monitored and should this identify the need for additional cycle parking, then this will be provided.
- 3.53 The proposed cycle parking provision therefore significantly exceeds OCC minimum requirements. It is considered more than sufficient to meet the needs of the Proposed Development and promote the use of cycling as a sustainable mode of travel, but also represents the very real opportunities for people to cycle in the area given its location.

Travel Plan

- 3.54 A Framework Travel Plan (CD1-17) was submitted alongside the planning application. The Framework Travel Plan details the comprehensive package of sustainable travel improvements that will be implemented as part of the Proposed Development.
- 3.55 The Framework Travel Plan includes details the measures and strategy that are in place to promote sustainable travel choices amongst future staff and visitors to the Site. The Framework Travel Plan also includes a commitment to appoint a Travel Plan Coordinator for the Site and sets out a programme of monitoring and review to assess the implementation and progress of the Travel Plan.
- 3.56 The Travel Plan includes the following commitments and initiatives to promote sustainable travel:
- ▶ Appointment of a Travel Plan Coordinator to implement and monitor the Travel Plan and promote sustainable travel;
 - ▶ Provide travel information on the resort website including details of the guest shuttle bus and public transport opportunities for guests to access the Site;
 - ▶ The provision of Travel Welcome Packs for staff to providing information on local walking and cycling routes, public transport infrastructure including the staff shuttle bus;
 - ▶ Providing public transport information and timetables will be displayed on staff noticeboards;
 - ▶ Monitoring usage of guest and staff cycle parking;
 - ▶ Monitoring usage of electric vehicle charging;
 - ▶ Promoting car sharing amongst staff and websites such as liftshare.org; and,
 - ▶ Undertake staff travel surveys and setting targets for staff mode share.
- 3.57 OCC has requested that the Travel Plan be secured by Planning Condition and the Appellant is satisfied to accept a Planning Condition in this regard.

Reducing the Need to Travel

- 3.58 With regard the 'need to travel', I refer to paragraph 103 of the NPPF which states:
- "Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes"*
- 3.59 As detailed previously in my evidence, tourism and leisure destinations, by their very nature, involve discretionary trips which inevitably result in the need for people to travel to that area as a visitor or guest visiting the destination. This is considered an intrinsic part of any tourism or leisure destination.

- 3.60 Self-evidently the principle of “limiting the need to travel” does not mean preventing travel to leisure or tourist destinations at all otherwise all such destinations would be incompatible with the NPPF. The reference within the NPPF to “limiting the need to travel” therefore needs to be considered in the context of the obvious benefits of tourism or leisure developments and the support for them in the NPPF and the way in which such destinations can indeed limit the need to travel further afield.
- 3.61 Thus, for example, paragraph 83 of the NPPF states that planning policies and decisions should enable *“sustainable rural tourism and leisure developments which respect the character of the countryside.”*
- 3.62 The principle of tourism and the provision of leisure developments (which people therefore need to reach) is supported by the NPPF. It is relevant that there are no equivalent water park facilities in the general area. Those living in this area seeking to visit a comparable destination will currently be required to travel a significantly further distance to visit such a destination. The Proposed Development will therefore reduce the need for local residents to travel further afield and therefore it will meet the objectives of the NPPF.
- 3.63 In addition to providing such a choice for people in the wider area, it is relevant to note that to facilitate access for people local to the facility the Appellant is making available day passes, which would be made available to local residents at discounted prices.
- 3.64 It is worth noting that the release of day passes will not result in additional vehicle traffic on the local network beyond that already assessed, as day passes will only be released for periods when the hotel is not at full capacity. Day visitor passes will be released on a sliding scale dependant on the occupancy of the hotel and will be issued on the following principles:
- ▶ Day visitor access to the Proposed Development will only be allowed at time when the hotel is below full capacity;
 - ▶ Day visitor passes will be released on a sliding scale dependant on the occupancy of the hotel;
 - ▶ The maximum number day passes that will be released will be 20% of total capacity of the Proposed Development, even if hotel occupancy were to fall below 80% occupancy;
 - ▶ Day passes will be available at a discount for local residents; and,
 - ▶ Day Pass access to the Proposed Development will be valid after 10am.
- 3.65 Standard day passes are likely to be less available during peak times of the year such as during school holidays and at weekends when the hotel will be closer to capacity. This is considered appropriate as it will prevent additional vehicular traffic to the Site during those peak periods.
- 3.66 The Appellant has a desire to allow local residents to continue to access the waterpark during these peak times and has proposed an additional stream of sustainable day passes allowing access to the waterpark and leisure facilities. These would also be secured through a Section 106 Agreement.
- 3.67 The concept of sustainable day passes would make additional day passes to the Proposed Development available exclusively to those who travel to the Site using the free guest shuttle bus provided. This promotes of the use of sustainable transport modes, and in particular, the free shuttle bus service as a sustainable, non-car mode of travel and, importantly, would not result in additional vehicular traffic being introduced onto the local road network.
- 3.68 The precise mechanism to manage this will be regulated by CDC/OCC as part of the Section 106 Agreement but it is envisaged that tickets will be validated or tokens provided as guests arrive by shuttle bus.

- 3.69 The sustainable day passes available each day would be booked in advance and be available in addition to hotel guest stays and regular day passes. In addition, and as with the regular day passes, there would be a discount available for local residents. This programme would generate 10,800 tickets per year and would be targeted specifically at local people, including those in the Bicester area who are most likely and able to arrive by the free shuttle bus being provided. As the programme does not link the release of sustainable day passes to the occupancy levels of the hotel, availability will remain at this level during peak times such as school holidays and weekends.
- 3.70 The availability of day passes and sustainable day passes, with discounts for local residents, will limit the need for travel by offering residents in the local access to a leisure facility which is not currently available within the local area and would currently result in the travelling further afield to access such a facility.

Summary

- 3.71 This Section of my evidence demonstrates how the Proposed Development is in a location which will be sustainable both for employees and guests through the measures proposed and offers a genuine choice of alternative sustainable transport modes, including alternatives to the private car.
- 3.72 My evidence includes details of the comprehensive package of sustainable transport measures, specifically targeted at guests and staff. The measures provide significant enhancements in pedestrian, cycle and public transport infrastructure serving the Site and offer a genuine choice of modes of travel.
- 3.73 As well as providing connectivity to the Proposed Development, the package of sustainable transport measures improves the accessibility of the local area to the benefit of existing residents and businesses. The new foot and cycle connections that will be available for local residents to use and a new public bus service between Chesterton and Bicester will provide a significant enhancement of the public transport connectivity of Chesterton delivering a regular public bus service between Chesterton and Bicester.
- 3.74 My evidence demonstrates that with the introduction of the package of measures agreed with the local highway authority the Proposed Development will be made sustainable, in accordance with the NPPF.

Use of Minor Rural Roads

- 3.75 This section of my evidence demonstrates how the Proposed Development will not result in significant numbers of private vehicle trips utilising minor rural roads.
- 3.76 The Department of Transport define the road classification system in the UK is as follows:

“

A roads – major roads intended to provide large-scale transport links within or between areas

B roads – roads intended to connect different areas, and to feed traffic between A roads and smaller roads on the network

classified unnumbered – smaller roads intended to connect together unclassified roads with A and B roads, and often linking a housing estate or a village to the rest of the network. Similar to ‘minor roads’ on an Ordnance Survey map and sometimes known unofficially as C roads

unclassified – local roads intended for local traffic. The vast majority (60%) of roads in the UK fall within this category”

- 3.77 In addition to the definition above, the Department of Transport defines an A class road as the:
- “highest class of classified road, and top tier of the roads classification system. They are identified by the local highway authority (where they are not in the SRN) and approved by the Secretary of State. Each A road is given a unique identifying number from a list maintained by the Department for Transport.”*

- 3.78 The Proposed Development is accessed from the A4095 and, as such, it is evident that the Proposed Development is accessed from an A class road.
- 3.79 The classification of roads at a local level is the responsibility of the local highway authority, namely OCC for the Proposed Development. The Oxfordshire Local Transport Plan provides detail of road classification within the County and Table 2 of the LTP provides details of the County approach to road classification. Table 2 of the LTP defines the A4095 as a category 3b road which is defined as:
- “A road suitable for important cross and inter-county traffic where there are relatively lower volumes of mostly local traffic.”*
- 3.80 To the east and west of the Site, the A4095 connects with the B4030, which is again a classified road. To the east of the Site the B4030 connects with the A41 and the M40 at Junction 9. To the west of the Site the B4030 connects south to the A34 and the M40 at Junction 9 and north to the A43 and the M40 at Junction 10. It is evident that the primary routes between the Site and the strategic road network will comprise classified A-class and B-class roads.
- 3.81 Table 2 of the LTP defines all B-class roads and category 4 road which is defined as:
- “A road suitable for other shorter cross and inter-county movements where volumes are relatively low and no principal road is available.”*
- 3.82 The routeing of vehicles between the strategic highway network and the Proposed Development has been discussed between the Appellant and Officers at OCC and it has been agreed that a contribution towards a coordinated signage strategy will be secured by S106 obligation and that this is appropriate to ensure the use of the primary routes to the Site by traffic associated with the Proposed Development. It is intended that the signage strategy will include the erection of signs indicating “No Access to Great Wolf Resort” or similar in key locations in the vicinity of the Site, such as at the junction between the A41 and the unnamed road which routes through Little Chesterton.
- 3.83 I note that OCC and Highways England, as local highway authority, has raised no objection to the impact of the Proposed Development on minor roads in the vicinity of the Site and I consider that there is no basis for such objection.

Delivery and Servicing Management Plan

- 3.84 The planning application is supported by a Framework Delivery and Servicing Management Plan (DSMP) (CD1-16) was submitted alongside the planning application. OCC have requested that a final DSMP be secured by Planning Condition and the Appellant is satisfied to accept a Planning Condition in relation to a final DSMP.
- 3.85 The Framework DSMP details measures that would be put in place by the Appellant to manage and monitor delivery and servicing activity associated with the Proposed Development and ensure that it occurs in a safe and efficient manner.
- 3.86 The DSMP will detail appropriate routes to the Site for use by suppliers undertaking deliveries. Suppliers will be advised of appropriate routes to the Site, avoiding minor rural roads.

Summary

- 3.87 In response to the second reason for refusal, my evidence demonstrates that the Proposed Development:
- ▶ Will offer a genuine choice of alternative travel modes; and,
 - ▶ Is unlikely to result in private motor vehicles utilising unsuitable minor rural roads.
- 3.88 The Proposed Development is supported by a substantial package of improvements aimed at providing a genuine choice of sustainable transport modes, including alternative travel modes over the private car, and these improvements can be appropriately secured by Section 278 highways works, planning conditions and planning obligations.

4.0 Reason for Refusal 3: Traffic Impact

- 4.1 Reason for refusal 3 relates to the highway impact of the development and specifically at the signalised junction between the B4030 and B430 junction in Middleton Stoney and states:

"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."

- 4.2 The Proposed Development is supported by a comprehensive Transport Assessment (CD1-24) which fully assesses the effect of the Proposed Development on the highway network and details of this are set out in this Section of my evidence.

- 4.3 The NPPF 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"

- 4.4 My evidence demonstrates that the Proposed Development will not result in a severe impact on the local highway network, including the B4030/B430 junction in Middleton Stoney. The Proposed Development can be accommodated on the local highway network without severe impact and therefore accords with the NPPF and the Cherwell Local Plan.

Consultation with OCC

- 4.5 My firm undertook extensive consultation with the local highway authority, OCC, in advance of submission of the planning application and during the determination of the planning application. At the time of determination of the planning application we were in ongoing discussions with OCC regarding the impact of the Proposed Development on the B4030 /B430 junction in Middleton Stoney.

- 4.6 Since determination of the planning application in March 2020 we have continued discussions with OCC to seek to resolve their outstanding concerns regarding the impact of the development at the B4030 /B430 junction in Middleton Stoney. An additional Technical Note was issued to OCC in September 2020 (CD10-23) providing additional modelling of the B4030 /B430 junction, along with details of a mitigation scheme at the junction.

- 4.7 OCC provided a response to that Technical Note on 15 September 2020, which is attached at [Appendix D](#). From this response, it is evident that OCC are not alleging that the Proposed Development will in fact cause any severe impact on this junction. To the contrary the only point that OCC seeks to make is that they believe that the Proposed Development will not deliver a betterment or improvement to existing congestion there, but there is no policy requirement to deliver this. Thus, they stated that:

"Given the results of the analysis it is not considered that the proposed Great Wolf mitigation scheme will reliably provide a signalised junction that will alleviate the current severe congestion or will improve upon the consented Heyford Park mitigation scheme."

- 4.8 In assessing the highway impacts of development, it is necessary to have regard to the policies in the NPPF. The NPPF states at paragraph 108 (c) that it is "significant impacts" on the transport network in terms of capacity and congestion or on highway safety which need to be cost effectively mitigated and further states at paragraph 109 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 impact on the road network would be severe".

- 4.9 I do not consider the increase in traffic at the Middleton Stoney junction from the Proposed Development to be significant, even without mitigation. The response from OCC refers to the existence already of severe congestion at that junction and acknowledges that this junction will be further impacted by the development of Heyford Park.
- 4.10 OCC considers that the proposed Great Wolf mitigation scheme, as shown at Drawing 1803047-17 attached at [Appendix E](#), will not alleviate the existing congestion at the junction, and that it will not provide a significant improvement to existing traffic conditions in comparison with the consented Heyford Park mitigation scheme. These are not in fact issues which the Appellant is required to address under the NPPF for the development to be acceptable. In any event, I do not agree with this analysis as the scheme will in fact deliver improvements.

Vehicle Movements Through Middleton Stoney

- 4.11 The planning application was supported by a comprehensive Transport Assessment (CD1-24), in accordance with the requirements of the NPPF and National Planning Practice Guidance.
- 4.12 The scope of the Transport Assessment and the methodology for assessing baseline traffic flows, consented development flows and development generated traffic were all agreed with Officers at OCC in advance of submission of the planning application.
- 4.13 The analysis presented within the Transport Assessment and subsequent Technical Notes demonstrates that the Proposed Development will not result in significant increases in vehicle movements at the Middleton Stoney junction.
- 4.14 Based on the analysis presented in the Transport Assessment, Table 4.1 below summaries the baseline and development generate traffic flows at the Middleton Stoney junction.

	Traffic Movements at B430/ B4030 Junction		
	2026 BTM Flows (exc. Heyford Park Phase 2)	Heyford Park Phase 2 Flows	Proposed Development
AM Peak	2,071	329	34
PM Peak	1,853	272	46

Table 4.1 B430/B4030 Signalised Crossroad Flow Comparison

- 4.15 The Proposed Development will only result in an increase of approximately 34 vehicle trips at this junction during the morning peak hour and 46 vehicles during the evening peak hour. This is equivalent to less than one additional vehicle movement per minute during the morning and evening peak hours. Furthermore, the change in traffic flow at the B430/B4030 junction as a result of the Proposed Development is likely to be imperceptible at 1.4% in the morning peak hour and 2.2% in the evening peak hour.
- 4.16 An automatic traffic count survey was undertaken on the B430 just south of the B430/ B4030 junction in May 2019. The survey covered a complete week and showed that morning and evening peak hour two-way traffic flows traffic can typically vary by up to 10%.
- 4.17 Even without any mitigation measures, the change in traffic flow at the junction, equivalent to 1.4% of traffic movements in the morning peak hour and 2.2% of traffic movements in the evening peak hour, are well within the daily variation of traffic on the B430, will be imperceptible to drivers and will not result in severe impact on the operation of the highway network.

Vehicle Routeing and Signage

- 4.18 Regardless of the absence of any severe impact, the Appellant has agreed to provide a contribution, secured by Section 106 agreement, towards a coordinated signage strategy for the development.

- 4.19 Accordingly, to the extent that there is any concern regarding the vehicle trips routeing via the B430/B4030 junction, then the signage strategy can be developed in a manner that seeks to direct drivers away from the B430 corridor and utilise other routes to access the Proposed Development. The local highway authority has full control over the signage strategy associated with the Proposed Development.
- 4.20 The analysis presented in the Transport Assessment assumes that all vehicles approaching the Site from the M40 (north) and A43 would route via the B430 to access the Site. The analysis presented in the Transport Assessment is therefore a robust analysis (in the sense that it assumes very much a worst-case scenario) of the impact of the development on the Middleton Stoney junction assuming no mitigation measures are in place.
- 4.21 I have considered the potential alternative routes for vehicles between the Site and the M40 (north) and A43 that could be encouraged by signage strategies. One potential signage strategy would be to direct drivers approaching from the A43, along the B4100 southbound towards Bicester and then along the A4095 towards the Site. This is currently the signed route to Bicester from the A43 and does not result in a material change in journey time between the A43 and the Site in comparison with the B430 route.
- 4.22 Utilising this alternative signage strategy could result in 16 fewer two-way vehicle trips routeing through the B430/B4030 junction during the morning peak hour, and 21 fewer two-way vehicle trips during the evening peak. Table 4.2 summarises the change in vehicle trips should vehicles route via the B4100 in accordance with such a signage strategy.

	Development Traffic Movements at Middleton Stoney junction		
	Current Assessed Flows	Adjusted Flows	Change in Flows
AM Peak	34	18	-16
PM Peak	46	25	-21

Table 4.2: Potential Change in Vehicles Trips at Middleton Stoney

- 4.23 The analysis shows that OCC could adopt an alternative signage strategy that itself could reduce vehicle movements on the B430 to approximately 18 vehicles in the morning peak hour and 25 vehicles in the evening peak hour, equivalent to one vehicle every 3 to 4 minutes and one vehicle every 2 to 3 minutes respectively. It is evident that the signage strategy could be developed in a manner to seek to minimise the number of trips associated with the development using the B430 and that this could be achieved via the strategic signage strategy for which the Appellant has already committed to provide a S106 contribution.
- 4.24 As detailed previously in my evidence, it has been agreed with OCC that a contribution towards a coordinated signage strategy will be secured by S106 obligation and it is intended that this will include the erection of signs indicating “No Access to Great Wolf Resort” or similar in key locations in the vicinity of the Site, such as at the junction between the A41 and the unnamed road which routes through Little Chesterton.

Other Mitigation of Traffic Impact at B430/B4030 Middleton Stoney

- 4.25 As I have already pointed out, the analysis presented within the Transport Assessment and subsequent Technical Notes demonstrates that the Proposed Development will not result in a material change in vehicle trips at the B430/ B4030 junction in Middleton Stoney even without any mitigation. Moreover, a simple signage strategy can be put in place to reduce any effects even further if required.
- 4.26 Notwithstanding and without prejudice to the above position, the Appellant has also gone further and identified a highway mitigation scheme that could be provided at the junction to introduce further improvements. This was presented in the Technical Note dated September 2020 and is illustrated on the Drawing 1803047-17, attached at [Appendix E](#).

- 4.27 There is already a consented scheme of highway works at the B430/B4030 junction associated with the consented Heyford Park Phase 1 development proposals, as shown at [Appendix F](#). The proposed works for the Proposed Development will be provided in addition to those approved as part of the Heyford Park Phase 1 and represent an improvement on them. They can be accommodated within the existing adopted highway at the junction and comprise the provision of an additional northbound dedicated left turn lane at the junction, along with minor changes to the south-eastern kerbline and road markings and adjustments to the signal timings at the junction.
- 4.28 OCC provided some commentary on a previous iteration of these proposed highway mitigation works in email correspondence dated 10th March 2020. In response to those comments an updated scheme of works was proposed in the Technical Note dated September 2020 and a Stage 1 Road Safety Audit (RSA) has been undertaken on the proposed highway mitigation work. The Stage 1 RSA and response to comments provided by OCC are included within the Technical Note, dated September 2020. The Stage 1 RSA raises no material concerns with the proposed mitigation scheme and all comments raised in the Audit can be addressed as part of the detailed design of the mitigation works.
- 4.29 The assessment of the operation of the Middleton Stoney junction, presented within the Transport Assessment, includes consideration of traffic associated with the Heyford Park Phase 2 development (Planning Ref: 18/00825/HYBRID). At the time of preparing the Transport Assessment for the Great Wolf application, the Heyford Park development did not include any highway mitigation works at the Middleton Stoney junction despite that development resulting in 329 additional vehicle trips at the junction during the morning peak hour and an additional 272 additional vehicles trips at the during the evening peak hour.
- 4.30 Since determination of the Great Wolf application, a Transport Assessment Addendum (TAA) has been submitted for the Heyford Park Phase 2 development. This includes mitigation measures associated with the impact of that development B430/ B4030 Middleton Stoney junction. The mitigation measures proposed as part of the Heyford Park Phase 2 scheme include no changes to the highway arrangement at the Middleton Stoney junction but include the introduction of a bus gate on the B4030 to the west of the junction, the introduction of a weight restriction on the B4030 east of the junction and sustainable travel measures include an improved bus service and cycle route between Heyford Park and Bicester. Further detail is provided within the Technical Note dated September 2020.
- 4.31 Table 4.2 shows the operation of the B430/B4030 signalised crossroads including the Heyford Park Phase 1 and Phase 2 developments. The assessment includes consideration of the highway improvements works at the Middleton Stoney consented as part of the Heyford Park Phase 1 development and includes changes to traffic movements at the junction as a result of the mitigation works proposed for Heyford Park Phase 2. Full model output files are included within the Technical Note dated September 2020.
- 4.32 The Degree of Saturation (“DoS”) provides a ratio of the theoretical capacity of a road link in comparison with the demand for vehicles using that link. A DoS of 100% would suggest that demand for vehicles using that link is equal to the theoretical capacity of that link. The Mean Maximum Queue (MMQ) represent the maximum queue with a typical traffic signal cycle, averaged over all the traffic signal cycles within the modelled time period.

	AM Peak		PM Peak	
	DoS	MMQ	DoS	MMQ
B430 (south)	107.3%	107	92.7%	36
B4030 (east)	106.7%	52	92.1%	24
B430 (north)	75.0%	11	92.5%	27
B4030 (west)	86.7%	5	44.8%	2

Table 4.2 B430/B4030 Signalised Crossroad – 2026 Baseline with Heyford Park Phase 1 & 2

- 4.33 Table 4.2 demonstrates that the junction is likely to operate within theoretical capacity (under 100% DoS) during the evening peak hour but over theoretical capacity (in excess of 100% DoS) during the morning peak hour, in the baseline situation.

- 4.34 Table 4.3 summarises the operation of the B430/B4030 signalised crossroads in the 2026 'With Development' scenario with the Proposed Development in place and the proposed mitigation. The analysis includes traffic associated with the proposed Heyford Park Phase 1 & 2 developments, along with the associated mitigation works. The assessment includes consideration of vehicle trips associated with the Proposed Development and the mitigation works shown at Drawing 1803047-17. Full model output files are included within the Technical Note dated September 2020.

	AM Peak		PM Peak	
	DoS	MMQ	DoS	MMQ
B430 (south)	108.7%	117	92.8%	37
B4030 (east)	107.8%	56	95.4%	26
B430 (north) (ahead/left)	37.5%	9	67.4%	20
B430 (north) (right)	75.0%	2	92.9%	8
B4030 (west)	86.7%	5	44.8%	2

Table 4.3 B430/B4030 Signalised Crossroad – 2026 Baseline with Heyford Park Phase 1 & 2 & Great Wolf

- 4.35 Table 4.3 demonstrates that with the traffic associated with the Proposed Development and associated mitigation, the junction will continue to operate within theoretical capacity during the evening peak hour. In the morning peak hour, the junction is shown to continue to operate in excess of theoretical capacity with the Proposed Development and mitigation in place. However, whilst the junction is expected to operate in excess of its theoretical capacity during the morning peak period, the Proposed Development will not have a significant effect on the operation of the junction and, as such, no further analysis or additional mitigation measures over these proposed are considered necessary.
- 4.36 The Appellant is prepared either to implement the mitigation scheme shown on Drawing 1803047-17 in the event that the consented Heyford Park Phase 1 works at the junction are complete prior to occupation, or implement both the mitigation scheme shown on Drawing 1803047-17 and the consented Heyford Park Phase 1 works at the junction in the event that the Phase 1 works are not complete prior to occupation, or pay a contribution equivalent to the cost of the works.
- 4.37 There is no doubt in my mind that the Proposed Development will not result in a severe cumulative impact on the operation B4030/B430 junction in Middleton Stoney. However, there are measures that can be introduced to control and reduce traffic movements through the junction, for example by developing the signage strategy in such a way that would direct drivers away from this junction as set out above.
- 4.38 Quite apart from all of the above, even if there remained any residual concern about the junction from the Proposed Development, as the analysis indicates that the junction is shown to operate over its theoretical capacity in the morning peak hour only (something that is simply a continuation of the baseline position), a simple planning control could be introduced if it were thought necessary in order to restrict guests arriving at the Site which would prevent guest traffic being generated in the morning peak hour (eg a restriction on check-in before 10.00am). This would significantly reduce development related trips during the weekday morning peak period in any event. It is standard practice for check-in times at hotels to be controlled and therefore such a restriction would be in no way unusual. Such simple planning controls have not been suggested by either OCC or CDC. For the reasons I have given, the imposition of such additional planning control is unnecessary given the absence of any material impact on the junction in the morning peak. However, if any contrary view is ultimately taken, the Appellant would consent to the imposition of a planning condition if the Inspector considered it necessary which would have the consequence of removing guest traffic from that junction in the morning peak in any event.

Highway Safety

- 4.39 A letter was issued to OCC dated 14 October 2020, attached at [Appendix G](#), seeking clarification from OCC on the matters relating to the Middleton Stoney junction.

- 4.40 In response to that letter, OCC provided further email correspondence on 8 December 2020 and 22 December 2020, attached at [Appendix H](#), suggesting that in addition to concerns regarding traffic impact at the Middleton Stoney junction, OCC also has concerns regarding the safety impact of the proposed highway mitigation works.
- 4.41 Again, I have already indicated that I do not consider the highway works to be necessary. But if they were considered necessary, I am satisfied that there are no safety issues which arise from them, only safety benefits.
- 4.42 Highway safety matters associated with the proposed highway mitigation works were considered as part of the Technical Note, including a Stage 1 Road Safety Audit (S1RSA) that was submitted to OCC on 4 September 2020.
- 4.43 The email correspondence from OCC dated 22 December 2020 correctly notes that there were five 'Problems' that were identified as part of the S1RSA. However, the response from OCC does not make any reference to the recommendations of the S1RSA on how those matters can be addressed and the Designers Response that was included within the Technical Note submitted to OCC on 4 September 2020.
- 4.44 I summarise below the matters raised in the S1RSA and detail the recommendations of the Audit in addressing these matters along with how these are addressed in Designers Response and through the future detailed design of the mitigation works.
- "Problem 1: Footway width could lead to pedestrians being struck by vehicles. The footway width at this location (north-eastern corner of the junction) is present as presented reduced by verge overgrowth and, to a lesser extent, the boundary hedge. Pedestrian waiting to cross would therefore necessarily stand close to the kerb, potential leaving them vulnerable to collision with a passing vehicle."*
- 4.45 The footway in this location is existing and the proposed highway mitigation works will not result in any reduction in footway width at this location. Pedestrian activity at the junction is very low due to location of the junction and the limited number of dwellings, shops and facilities in the vicinity of the junction. The Proposed Development will not result in any change in the number of pedestrian movements at the junction and the section of footway is in a position which could currently be utilised by pedestrians crossing at the junction in any event.
- 4.46 The S1RSA recommends that verge overgrowth and the boundary hedge are cut back in order to increase the footway width in this location over the existing width and the Designers Response to the S1RSA confirms that this will be done and will be addressed at the detailed design stage. This therefore will be something which results in an improvement on safety in consequence of the proposal over the existing situation. In addition, subsequent correspondence from the Auditor included within the Technical Note dated September 2020 states that:
- "We refer at paragraph 5.3 of the Audit report to the cutting back of verge overgrowth on the east side of the new pedestrian crossing; this could widen the footway from 0.85m to 1.25m. Cutting back the boundary hedge within the highway could potentially widen it further to approximately 1.4m. Whilst this remains below optimum (1.8-2.0m), the improvement to pedestrian safety and comfort compared with the existing situation, would be substantial."*
- 4.47 The email correspondence from OCC dated 22 December also states that:
- "we are concerned that the proposed mitigation does nothing to address the existing footway width problems at the junction. Some of the footway widths are considerably below standard with widths of less than a metre in places."*
- 4.48 As indicated above, the Proposed Development will not result in an increase in pedestrian movements at the junction and, as highlighted by OCC, the sections of constrained footway represent the existing situation and the Proposed Development is not required to improve existing situations. However, it has been accepted that verge overgrowth and a boundary hedge will be cut back in order to improve footway width over the existing situation and the Safety Auditor has confirmed that the *"improvement to pedestrian safety and comfort compared with the existing situation, would be substantial"*. The Proposed Development will therefore result in an improvement in highway safety.

4.49 The email correspondence from OCC dated 22 December also suggested that:

“With the introduction of a new pedestrian refuge, pedestrians are encouraged to focus crossing movements at a specific point where the existing footway is at its narrowest. They are then expected to cross uncontrolled during intergreen periods in a situation where larger vehicles may be trying to clear the junction.”

4.50 The existing pedestrian facilities at the junction comprise informal crossings with dropped kerbs and tactile paving on the southern Oxford Road arm, Bicester Road and Heyford Road arms of the junction. Correspondence from the Auditor confirms that these:

“are in a poor state of repair and appear largely unused, as evidenced by soil and vegetation overgrowth masking the tactile paviers.”

4.51 For pedestrians seeking to crossing the B430 Oxford Road, the existing informal crossing is located to the south of the junction, which is not on the desire line for pedestrians crossing between the majority of local dwellings and local services, such as the local pub. As such, it is likely that pedestrians are currently crossing through the middle of the junction, or using a more direct alignment between Bicester Road and Heyford Road, where there are currently no pedestrian facilities. As part of the proposed highway mitigation works it is proposed to provide a new pedestrian refuge with dropped kerbs and tactile paving located within the junction and this will be on the desire line for pedestrians routeing between local dwellings and services and is therefore considered more convenient for pedestrians. Again, this therefore results in an improvement over the existing situation.

4.52 At present, and under the consented Heyford Park Phase 1 mitigation scheme, pedestrians are required to cross the width of the B430 in a one movement with no refuge in the centre of the carriageway. Furthermore, the existing pedestrian crossing facility south of the junction is positioned in advance of the northbound stopline such that pedestrians are currently required to walk between queueing vehicles. In relation to the existing pedestrian crossing of Oxford Road, the correspondence from the Safety Auditor, included within the Technical Note dated September 2020, states that:

“The Oxford Road crossing is situated upstream of the traffic signal stop line, which is hazardous for pedestrians because it encourages them to cross between queueing vehicles and appears not to serve any meaningful desire line. The apparently low usage suggests that it could be removed without detriment to pedestrian safety.”

4.53 As part of the proposed highway mitigation works, detailed on Drawing 1803047-17, it is proposed to provide a new pedestrian refuge allowing pedestrian to cross the B430 in two movements and wait safely in the centre of the carriageway. The arrangement also moves the pedestrian crossing point from a location in advance of the northbound stopline, to within the junction and this means that pedestrians are no longer required to cross between queueing vehicles. Again this is considered a safer arrangement. Furthermore, the proposed pedestrian crossing point and refuge provide the opportunity for pedestrians to cross the northbound and southbound carriageway of the B430 during traffic-free phases within the junction signal phasing. For example, a pedestrian can cross the southbound carriageway of the B430 during the green phase for the B4030 Bicester Road and there will be no conflict between pedestrians and vehicle movements. Similarly, a pedestrian can cross the northbound carriageway during the green phase for the B4030 Heyford Road and there will be no conflict between pedestrians and vehicles. In comparison, under the current pedestrian crossing arrangements pedestrians crossing the B430 will always be in conflict traffic movements either on the B430 or turning from the B4030. Furthermore, the correspondence from the Auditor confirms that:

“The proposed replacement crossing to the north will provide the following benefits:

- ▶ *It is more likely to be used by virtue of its location;*
- ▶ *It is safer due to the provision of a central refuge island;*
- ▶ *It does not encourage pedestrians to cross between queueing vehicles;*

- ▶ *It allows pedestrians to cross in two stages, negotiating different traffic streams separately and using gaps created by the signal stages;*
 - ▶ *It affords greater visibility for pedestrians crossing east-west to the stop line of Bicester Road."*
- 4.54 On the basis of the above, I am of the view that the matter raised by the S1RSA is appropriately addressed by the Designers Response. Moreover, the cutting back of existing verge overgrowth and boundary hedge, as part of the proposed highway mitigation works, will result in an improvement in pedestrian crossing facilities and highway safety in comparison with the existing situation as outlined above.
- "Problem 2: Side impact collisions. Northbound drivers approaching the junction may not be aware of the lane assignment and could make late lane changes, leading to side impact collisions"*
- 4.55 The S1RSA recommends that to address this matter additional lane designation/ destination signs are provided on the northbound approach to the junction and the Designers Response acknowledges that this will be provided and it is typical for signage to be agreed at the detailed design stage. Notwithstanding that, an indicative Lane Dedication Sign has been prepared and issued to OCC and is attached at [Appendix I](#). I note that the email correspondence from OCC dated 22 December 2020 confirms that:
- "We would be of the view that the signage proposal appears to be acceptable in principle (subject to detailed design and taking into account signage proposals associated with the Heyford Park Phase 1 mitigation scheme)."*
- 4.56 On the basis of the above, I am of the view that the matter raised by the S1RSA is appropriately addressed by the Designers Response and indicative signage proposals provided.
- "Problem 3: Risk of head-on collisions between right-turning vehicles. Drivers turning right into Middleton Park may inadvertently stray into the right turn lane for Bicester Road, leading to head-on collisions"*
- 4.57 The S1RSA recommends that there should be the provision of additional road markings and/ or road studs on Oxford Road, between the southbound and the right turn lane to enhance legibility of the road layout. The Designers Response acknowledges that additional right turn lane road markings or road studs can be provided as part of the proposed highway mitigation works. It is evident that the addition of these would not materially change the works and can be delivered within the adopted highway and can therefore be designed at the detailed design stage.
- 4.58 On the basis of the above, I am of the view that the matter raised by the S1RSA is appropriately addressed by the Designers Response which accepts the recommendations of the Audit.
- "Problem 4: Risk of collisions involving vehicles turning from an uncontrolled access into the controlled area. Drivers emerging from the private access may not know which traffic stream has priority (a green signal) and could collide with a vehicle passing through the junction"*
- 4.59 The location of the southbound stopline, in advance of the private access to the Turney Group site, is part of the approved highways works associated with the Phase 1 Heyford Park scheme. The position of the stopline is therefore not part of the currently proposed highway mitigation works, which do not propose any changes to the stopline position.
- 4.60 In any event, the S1RSA recommends that to address this existing matter a traffic signal head is provided on the proposed pedestrian refuge island facing Ardley Road (southbound) but visible to the drivers emerging from the private access. The Designers Response confirms that the positioning of signal heads will be fully considered at the detailed design stage, as is typical practice, but it is agreed that a signal head could be provided on the refuge island and this is commonplace and is shown, for example, at Figures 7.2.9N and 7.16 of DMRB CD123. However, should the highway authority prefer that a signal head not be provided on the refuge island, then there is an alternative position for a signal head on the western side of the carriageway.

4.61 On the basis of the above, I am of the view that the matter raised by the S1RSA reflects a matter associated with the highway works consented as part of the Phase 1 Heyford Park scheme, rather than something created by the Proposed Development. Notwithstanding this, I am of the view that this has been appropriately addressed by the Designers Response and can be addressed by the siting of a signal head at the detailed design stage.

“Problem 5: Risk of vehicles, cyclists and pedestrian colliding with street furniture. Street furniture and lighting details are not available to the Audit Team and it is acknowledged this will be a detailed design matter, for consideration at Stage 2 RSA. However, if street furniture is not mounted appropriately it could be struck by pedestrians, cyclists or vehicles”

4.62 The S1RSA recommends that, at the detailed design stage, street furniture will be carefully located/mounted to minimise the risk of vehicle strikes and obstruction of pedestrians/cyclists. The Designers Response accepts this recommendation of the audit and confirms that, in accordance with standard practice, the positioning of street furniture will be considered at the detailed design stage. It is highlighted that the proposed highway mitigation works comprise alterations to an existing signal-controlled junction and therefore significant changes to street furniture are not expected.

4.63 The email correspondence from OCC dated 22 December 2020 raises concerns in relation to large vehicles over-sailing the footways. The axles on large vehicles are configured to ensure that they are as manoeuvrable as possible and this inevitably allows for part of the body of the vehicle to over-sail the edge of the carriageway as necessary. Indeed, it is for this reason that street furniture is always set back from the edge of the carriageway, in this case, any over-sailing relates only to the largest vehicles that are likely to travel through the junction infrequently, particularly having regard to planned heavy goods vehicle restrictions associated with development at Heyford Park. It does not follow that simply because part of a vehicle may need to over-sail a footway that this would put pedestrians at risk as it is a reasonable assumption that both the driver of the vehicle and the pedestrian(s) would take appropriate action to avoid any such risk.

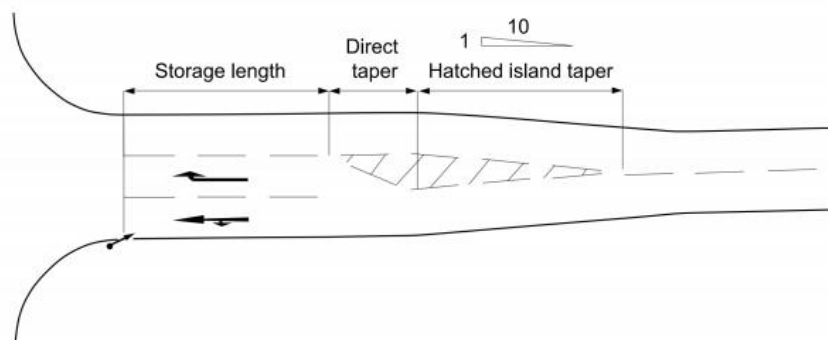
4.64 The email correspondence from OCC dated 22 December 2020 also states that:

“In relation to the geometry, we have now had a further opportunity to undertake a full review of the preliminary design against the DMRB and note that the design appears to fall short of standards in relation to taper lengths on the approach to the junction.”

4.65 In relation to the design of signal-controlled junctions, I would refer to Paragraph 7.8.2 of DMRB CD123 ‘Geometric design of at-grade priority and signal-controlled junctions’ states that at signal-controlled junctions:

“On single carriageway roads, hatched islands for right turn lanes should be developed symmetrically from the centre line of the road with a minimum taper of 1 in 10 and a direct taper of 7.5 metres, as illustrated in Figure 7.8.2.”

Figure 7.8.2 Right turn lane hatched island layout



- 4.66 The direct taper included within the proposed highway mitigation works is approximately 4 metres and is simply consistent with the direct taper included within the approved mitigation scheme associated with the Phase 1 Heyford Park scheme, which is slightly below the recommended guidance within DMRB CD123. Should the local highway authority have a concern regard the direct taper length, this could be adjusted as part of the detailed design of the highway works and can be readily incorporated into the design.
- 4.67 The taper of the proposed centre hatched island is also consistent with that included within the consented mitigation scheme associated with the Phase 1 Heyford Park scheme and develops to a width of 3 metres over a distance of circa 58 metres, equating to a rate of approximately 1:19 and is therefore a gentler taper than detailed in CD123. In addition to the nearside taper develops to a width of 1.8 metres over a distance of 28 metres, equating to a rate of approximately 1:16 and is therefore a smoother taper than detailed in CD123. Notwithstanding this, should the local highway authority have a concern regard the direct taper length, this could be easily adjusted at the detailed design.
- 4.68 On the basis of the above, I am of the view that the matter raised by OCC and the S1RSA are appropriately addressed by the Designers Response and can be designed as part of the detailed design of the works, as is normal practice.

Summary

- 4.69 My evidence demonstrates that the Proposed Development is supported by a comprehensive Transport Assessment and subsequent Technical Notes which assess the effect of the Proposed Development on the highway network.
- 4.70 My evidence demonstrates that the Proposed Development will not result in severe impact on the local highway network including B4030/B430 junction in Middleton Stoney even without mitigation measures. The Proposed Development can therefore be accommodated on the local highway network without severe impact and therefore accords with the NPPF and the Cherwell Local Plan. Notwithstanding this, I have gone on to identify additional mitigation measures and a condition which are offered if they are thought to be necessary and which can improve the situation at the Middleton Stoney junction in any event.
- 4.71 My evidence demonstrates that the Proposed Development will not result in severe impact on highway safety at the B4030/B430 junction in Middleton Stoney. A Stage 1 Road Safety Audit has been undertaken of the proposed highway mitigation works. All matters raised by the Audit or by OCC can and will be addressed at the detailed design stage, as is normal practice.

5.0 Third-Party Objections

5.1 This section of my evidence considers the objections to the Proposed Development which has been received from third-parties including the Rule 6 party, Parishes Against Wolf (PAW) which comprises Chesterton Parish Council (CPC) and other Parish Councils in the area and other third-party objectors.

Parishes Against Wolf (PAW)

5.2 I have reviewed the Statement of Case from Carter Jonas on behalf of PAW dated 27 November 2020 and the letter, appended to the Statement Case, from Paul Basham Associates (PBA) dated 28 January 2020. I consider that in regards to highways and transport matters, the objections from PAW comprise the following topics, and I will address each of the topics in this section of my Evidence.

- ▶ Sustainability;
- ▶ The vehicle trip attraction of the Proposed Development;
- ▶ The impact of the Proposed Development on the local highway network;
- ▶ The proposed car parking provision;
- ▶ Design of Site access junction; and,
- ▶ The diversion of a public right of way (PRoW).

Sustainability

5.3 The objection from CPC asserts that the Proposed Development creates an unsustainable form of development on the basis of the location of the Site and the opportunities for sustainable travel choices.

5.4 I fundamentally disagree. As demonstrated in Section 3 of my evidence, the Proposed Development is well located for such a resort. It also includes a substantial package of improvements to the sustainable transport infrastructure in the vicinity of the Site and these improvements can be appropriately secured by Section 278 highways works, planning conditions and planning obligations.

5.5 The improvements to local walking and cycling infrastructure will integrate the Site into the local pedestrian and cycling network and provide the opportunity for staff from the local area to walk or cycle to the Site and will improve transport links in the local area. The introduction of a dedicated staff shuttle bus service and contribution towards a public bus service, provide the opportunity for staff to travel to/from the Site by public transport and the staff shuttle bus service has the benefit of flexibility to meet the needs of staff. The dedicated guest shuttle bus service will connect between the Site and local train stations providing the opportunity for guests to interchange between the shuttle bus and national rail services. As demonstrated in Section 3 of my evidence, this provides a large catchment area for guest to travel to/from the Site by public transport within a suitable journey time. In addition, the Proposed Development will support sustainable transport modes in the form of low or ultra low emission vehicles and car sharing.

5.6 My evidence demonstrates that the Proposed Development will offer a genuine choice of alternative sustainable transport modes and it will be sustainable and therefore accords with the policies of the Cherwell Local Plan and the NPPF in this regard.

Vehicle Trip Attraction

5.7 The PAW Statement of Case asserts that:

“the Appellant has under-estimated the traffic attractiveness of the appeal proposal”

5.8 Again, I fundamentally disagree. The Transport Assessment supporting the planning application includes a robust assessment of the expected trip attraction of the Proposed Development which has been reviewed by both OCC and Highways England, both of whom have no objection to the proposed methodology.

- 5.9 The Proposed Development comprises a leisure resort incorporating a waterpark, family entertainment centre, hotel, conferencing facilities and restaurants. There is no directly comparable facility to this currently within the UK. On that basis the trip attraction methodology is based on surveys of three existing Great Wolf resorts in the United States as these provide the most direct comparison to the Proposed Development.
- 5.10 The three sites were surveyed over a public holiday period representing a peak period of usage of the resorts. All three sites surveyed include comparable facilities to those of the Proposed Development including comparable conference facilities. All of the survey sites had conferencing events taking place over the surveyed period and therefore the trip attraction analysis presented in the Transport Assessment takes full consideration of the proposed conferencing facilities and provides an appropriate and robust assessment of the trip attraction of the Proposed Development.
- 5.11 It was recognised that the surveyed sites are located outside the UK. Therefore, to test the robustness of the proposed trip attraction methodology a first principles sensitivity test was undertaken and was presented in a Scoping Note, appended to the Transport Assessment.
- 5.12 The first principles sensitivity test was based on the following criteria:
- ▶ 100% occupancy of hotel rooms on Friday night (for assessment for weekday morning and evening peak hours);
 - ▶ 100% occupancy of hotel rooms on Saturday night;
 - ▶ The average duration of stay of guests of 1.6 days;
 - ▶ The overlap of departing and arriving guests;
 - ▶ Staff numbers and shift patterns;
 - ▶ The arrival and departure profile of guests throughout a day;
 - ▶ The expected car occupancy of guests; and,
 - ▶ A robust worst-case estimate of car mode-share based on surveys at a Center Parcs site.
- 5.13 Table 2.7 of the Scoping Note appended to the Transport Assessment, compares the expected trip attraction of the Proposed Development based on the first principles sensitivity test with the trip attraction methodology based on surveys of existing Great Wolf sites. This comparison demonstrates that the methodology based on surveys of existing Great Wolf sites provides a more robust, higher total trip attraction in all peak periods, than the analysis based on the first principles sensitivity test. It is evident that the expected trip attraction presented in the Transport Assessment is robust and does not under-estimate the traffic attraction of the Proposed Development at all.
- 5.14 The PAW Statement of Case asserts that:
- "It does not accept the findings of the 'First Principles Sensitivity Test' provided in the Scoping Note Addendum: Trip Generation Analysis provided at Appendix H to the Transport Assessment as being reliable because it remains predicated on data from the United States of America (in respect of the expected hotel and room occupancy rates, and average durations of stay (paragraph 2.9 refers))"*
- 5.15 The assertion that expected occupancy and duration of stay analysis included within the sensitivity test were based on data from the United States, and is therefore somehow unreliable, is simply incorrect.
- 5.16 The 'First Principles Sensitivity Test' presented in the Scoping Note was based upon 100% resort occupation resort on Friday and on Saturday. The expected duration of stay utilised within the sensitivity test is based on the Appellant's business model for the current development not data from the US. The analysis assumes a very robust full occupancy of the hotel and PAW's reference to data from the United States is irrelevant and incorrect.
- 5.17 The PAW Statement of Case asserts that:

“the Appellant’s evidence base acknowledges that the car dependency of visitor car dependency of visitors to the appeal proposal is likely to be in the order of 98%”

- 5.18 This assertion is also incorrect. In order to review the robustness of the proposed trip attraction assessment, a ‘First Principles Sensitivity Test’ was undertaken. In order to ensure that the sensitivity test was a robust worst-case assessment a very high level of car usage amongst guest was assumed simply to assess the situation if such car usage theoretically arose. This figure is neither an expected, nor target mode share for the Proposed Development.
- 5.19 In fact, the mode share figure of 98% was based on guest arrivals at the Center Parcs site at Elveden Forest, as presented within the Transportation Assessment supporting the planning application for a Center Parc at Woburn Forest. The figure of 98% of guests arriving by car in fact comprised 32% of guests being a car driver and 66% of guests being a car passenger/ car sharer. Car sharing is defined as a sustainable mode of travel by the NPPF. Even if the same figure of 98% were to occur for the Proposed Development it would reflect over two-thirds of guests arriving by a sustainable mode of travel.
- 5.20 However, the 98% figure was not a prediction it was simply used as a basis for the sensitivity test. The opportunity to travel to this Site by non-car modes is very significant indeed with the proposed shuttle bus providing connections to local rail stations, a contribution to provide a new bus route serving the Site, along with improvements to local pedestrian and cycle infrastructure.
- 5.21 The PAW Statement of Case also contends that the drive time catchment has been based on a 2 hour and 7 minute journey time and it asserts that only 4.56% of this catchment area, by square kilometre, is accessible within a comparable journey time of the Site. I note that PAW concedes that its analysis makes no consideration of the proposed shuttle bus between the Site and both Bicester Village and Bicester North stations.
- 5.22 As set out in Section 3 of my evidence, the catchment area of the Proposed Development that has been used is in fact a 2.5 hour journey time and this has been the basis of the drive time catchment presented in the Transport Assessment. It is unclear how PAW has purported to undertake its assessment of journey time, but I consider that assessing population catchment by area (square metres) is unrepresentative as this does not take account of the actual population with that area. My evidence includes a detailed analysis of the public transport accessibility of the Site utilising TRACC GIS software, which is an industry standard software for assessing public transport accessibility. It demonstrates that, with the proposed public transport improvements being delivered as part of the Proposed Development, there is a population in excess of 10 million people with a 2.5 hour public transport journey of the Proposed Development. It is therefore evident that there is a very substantial population within a reasonable journey time of the Site by public transport, so demonstrating the very real choice that this presents and the genuine ability for a significant number of guests to travel to the Site by public transport with the shuttle bus in place.

Impact on the Highway Network

- 5.23 The PAW Statement of Case asserts that:
- “the application of reasonable traffic attraction and assignment assumptions will demonstrate that the appeal proposal provides an inadequate quantum of car parking to satisfy the demand for car parking within the curtilage of the appeal site, and that the residual cumulative impact upon the adjacent public highway network will be severe and give rise to rational highway safety concerns”*
- 5.24 As set out in my evidence above, the Transport Assessment includes a robust analysis of the expected trip attraction of the Proposed Development including a comprehensive sensitivity test analysis and detailed assessment of a signage strategy and vehicle routeing. My evidence demonstrates that the Transport Assessment is based on robust traffic attraction and assignment assumption which have been agreed with both the local highway authority, OCC, and Highways England.

- 5.25 The effect of the Proposed Development on the wider highway network is considered in detail within the Transport Assessment, which demonstrates that the Proposed Development will not result in any severe impact on the local highway network including B4030/B430 junction in Middleton Stoney even without mitigation measures. The Proposed Development can be accommodated on the local highway network without severe impact and therefore accords with the NPPF and the Cherwell Local Plan.
- 5.26 The letter from PBA, appended to the PAW Statement of Case, asserts that they have concern about the extent to which committed developments have been included within the assessment, although PBA provides no specific details over which committed development they consider has been omitted from the analysis. The assessment presented within the submitted Transport Assessment has been based on traffic data from the Bicester Transport Model (BTM), maintained by OCC, and includes consideration of traffic associated with planned and committed developments in Bicester.
- 5.27 In addition to the traffic data from the BTM, the assessment has also given consideration to any further developments, as advised by OCC, which were not included within the BTM such as Heyford Park Phase 2, BSA Chesterton, Alchester Park residential development, Audley Gardens residential development and the extension of the Bicester Hotel Golf and Spa. The assessment of committed developments and future baseline traffic flows is considered robust and has been agreed with Officers at OCC.

Car Parking Provision

- 5.28 The PAW Statement of Case asserts that:
- “the appeal proposal provides an inadequate quantum of car parking to satisfy the demand for car parking within the curtilage of the appeal site”*
- 5.29 In contrast, the letter from PBA appended to the Statement of Case asserts that:
- “the provision of 900 car parking spaces is excessive”*
- 5.30 The submission by PAW therefore asserts that the level of car parking provision is both too low and too high, without providing any evidence to justify either position.
- 5.31 The proposed level of car parking provision has been developed with reference to a car parking accumulation based on the trip attraction on existing comparable sites. As demonstrated in my evidence, the trip attraction methodology provides a robust analysis of the trip attraction of the Proposed Development and includes consideration of parking demand associated with both staff and guests at the Site, the overlapping of guests departing and arriving at the Site and the proposed conference facilities.
- 5.32 Moreover, low and ultra low emission vehicles, including electric vehicles, are recognised as a sustainable mode of travel by the NPPF. The proposed car parking provision will include a minimum of 10% of on-site car parking spaces with electric charging facilities from opening of the Proposed Development. All remaining parking spaces will include with underground ductwork to enable the future expansion of the vehicle charging system as the take up of electric vehicles increases and this will be monitored through the Travel Plan.
- 5.33 The proposed level of car parking provision has been agreed with Officers at OCC.

Design of Site Access Junction

- 5.34 The letter from PBA asserts that the drawings of the proposed Site access junction have been based on Ordnance Survey mapping and do not include any measured geometries. They claim it is not possible to determine whether the junction has been designed in accordance with relevant design standards and whether the right turn lane has sufficient capacity to accommodate right turning vehicles.
- 5.35 It is in fact standard practice at the planning application stage for junction designs to be prepared using Ordnance Survey mapping. Checks have been carried out to ensure that the proposed improvements can be accommodated on the Site. If planning permission is granted then detailed design of the proposed Site access junction would be undertaken based on a topographical survey of the Site, but there is no requirement for such detail at this stage.

- 5.36 Moreover, the Transport Assessment submitted alongside the planning application includes scaled drawings of the layout of the proposed Site access junction from which it is possible to determine the proposed dimensions of the junction. This has been designed in accordance with guidance provided in the Design Manual for Roads and Bridges (DMRB). The proposed design of the Site access junction has been reviewed by Officers at OCC and they have confirmed they have no objection to the proposed layout of the access junction.
- 5.37 The proposed right turn ghost island lane has been designed in accordance with the DMRB. The Transport Assessment submitted alongside the planning application includes PICADY modelling of the Site access junction which, based on the proposed geometries, demonstrates that there is ample space within the right turn lane to accommodate the expected number of waiting vehicles which is in fact just a single vehicle.
- 5.38 My evidence demonstrates that the proposed Site access junction, as shown on Drawing 1803047-03 E has been designed in accordance with relevant national guidance, will operate within capacity and without material queuing and is therefore appropriate to serve the Proposed Development.

Diversion of Public Right of Way

- 5.39 The Proposed Development includes proposals to divert an existing Public Right of Way (PROW 161/6/10) which currently crosses the Site as shown at Figure 5.1 below.

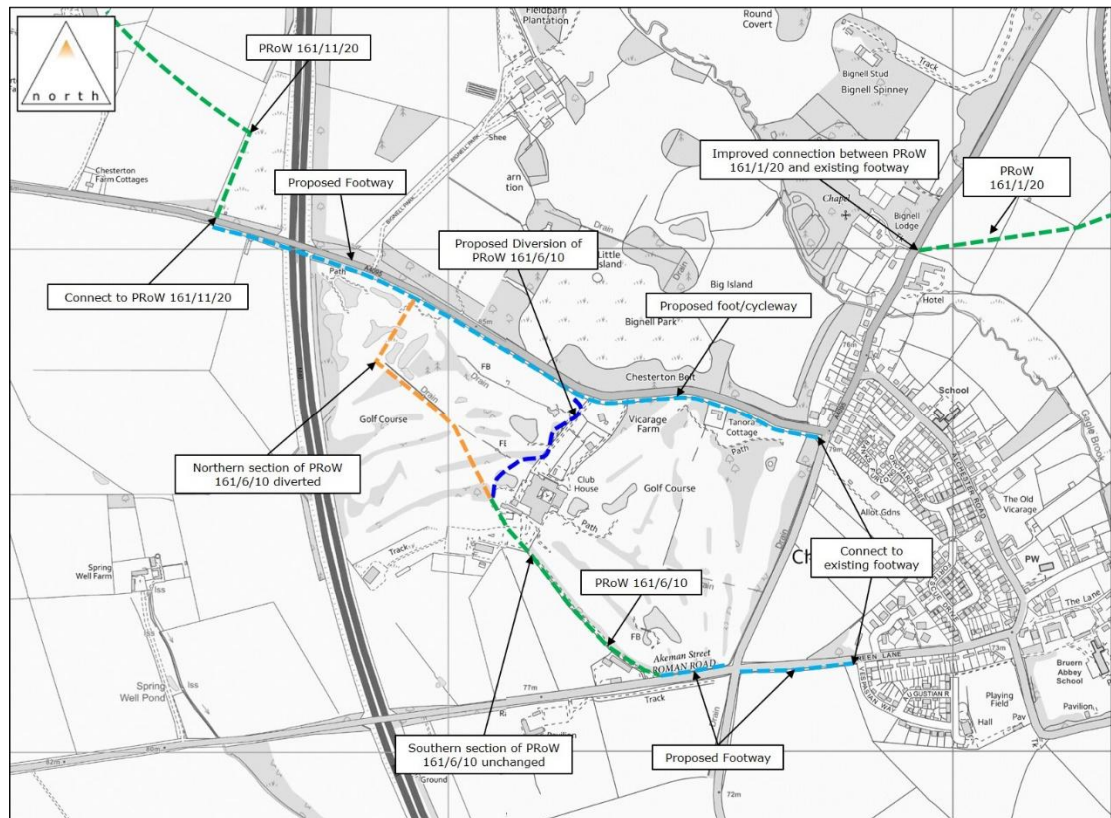


Figure 5.1 – PRoW Diversion and Pedestrian Improvements

- 5.40 The letter from PBA, appended to the PAW Statement of Case, asserts that the public right of way is well used by residents of Chesterton, offers a traffic free route between the golf course car park and the A4095 and that the diversion of the PROW will lead to an increase in risk of collisions between vehicles and pedestrians and does not lead to an overall betterment for footpath users.
- 5.41 Although PBA assert that existing PRoW 161/6/10 is well used by local residents, it provides no evidence of the usage of the PROW. My firm commissioned surveys of the usage of the PROW on Thursday 23rd August and Saturday 25th August 2018, which was a summer bank holiday weekend and therefore considered a peak period of leisure usage of the PROW and usage of the golf course.

- 5.42 The surveys covered 07.00 to 21.00 on both of the days and recorded people entering the PRoW from both the southern end, at the access to Bicester Hotel Golf & Spa, and the northern end from the A4095. The surveys recorded the number of people utilising the PRoW and people that were using it were questioned on why they were utilising the PRoW.
- 5.43 Across both days no people were surveyed entering or exiting the PRoW from the northern access from the A4095. On the Thursday, only 4 people were surveyed walking to the PRoW from Green Lane. All of the people surveyed were walking to Bicester Hotel Golf & Spa; 2 as staff and 2 visiting the gym. On Saturday only 3 people were surveyed walking to the PRoW from the Green Lane. All of the people surveyed were walking to the Bicester Hotel Golf & Spa; 1 as staff and 2 visiting the café.
- 5.44 Existing use of the PRoW is very low, with all usage surveyed being associated with the route between Green Lane and Bicester Hotel Golf & Spa. This would be unaffected by the proposed diversion. It is evident that the proposed provision of a new section of footway from the southern end of PRoW to Chesterton would in fact provide a betterment to all the surveyed users of the PRoW. So even if the use is higher than surveyed, the Proposed Development will enhance the existing route for pedestrians.
- 5.45 Section 3 of my evidence details the comprehensive pedestrian improvements proposed around the Proposed Development which connect the Site and PROW 161/6/10 into the wider PROW and footway network. At present there is no footway provided at either the northern or southern end of PRoW 161/6/10, where it connects with the A4095 and Green Lane. At either end of the PRoW pedestrians are required to walk either within the carriageway or on grass verges adjacent to carriageway to connect from the PRoW to either other PROWs or sections of footway.
- 5.46 At the southern end of PRoW 161/6/10 pedestrians are currently required to walk within the carriageway or verge for a distance of approximately 420 metres, including crossing The Hale, to connect between PRoW 161/06 and existing footway which commences on Green Lane at Vespasian Way. The proposals also include two new lengths of footway on Green Lane, either side of The Hale. These new sections of footway provide a connection between the southern end of PRoW 161/6/10 and the existing footway on Green Lane adjacent to Vespasian Way.
- 5.47 At the northern end of PRoW 161/6/10 pedestrians are currently required to walk within the carriageway or verge for either a distance of 850 metres east to connect to existing footway which commence on the A4095 adjacent to The Hale or 450 metres west to connect with PRoW 161/11/20. The Proposed Development includes a new section of foot/cycleway connecting from the Site access east to the existing footway in Chesterton and additional stretch of footway of circa 370 metres in length along the A4095 west of the proposed Site access junction, either side of the motorway overbridge, to connect with PRoW 161/11/20 to the west.
- 5.48 It is therefore evident that the Proposed Development provides a betterment to existing facilities for pedestrians and provides footway connections at the northern and southern ends of the PRoW, connecting into the wider footway and PRoW network, where pedestrians are currently required to walk within the carriageway or grass verge.

Other Third-Party Objections

- 5.49 I have reviewed the objection letters insofar as they relate to transport and the vast majority of matters are already covered in the Transport Assessment and in my evidence. In the objection dated 18 November 2020 from Terry Pollard of The Ramblers' Association it is alleged that the PRoW is to be diverted from a pleasant route to a new route to the side of the A4095. The nature of the existing PRoW is dealt with in more detail by Mr Waddell, but I refer back to what I have already identified in my evidence that when the route was surveyed over a bank holiday weekend in August 2018, there were no people observed using the section of PRoW in question. Furthermore, the diversion will take people away from an active golf course, where errant golf balls are an inevitable hazard, to a new section of footpath away from the course. Furthermore, to continue on footpath 161 beyond the northern extent of the Proposed Development currently requires users to walk either within the A4095 carriageway or on the adjacent verge over a distance of some 500 metres. The Proposed Development include provision of a new section of footway adjacent to the A4095 that completely eliminates this and which I therefore consider to be a safety benefit. It is also noteworthy that my firm did attempt to engage with a representative of The Ramblers' Association in February 2020, but David Godfrey felt unable to engage as he considered that to do so could be interpreted as approval of the application. Finally, I should highlight that the Countryside Access Officer at OCC raises no objection to the proposed diversion of the PRoW.
- 5.50 I also note that in an email dated 23 November 2020, Ian Reid commented on behalf of the Bicester Millennium Cycle Club, a group of over 200 cyclists based in Bicester and surrounding towns and villages. In his email, Mr Reid raised concerns relating to the impact of additional traffic on the A4095 and Akeman Street (which leads into Green Lane to the west of the Site) during both the construction and operational phases. As I have explained above, traffic will access the Proposed Development via A and B class roads, which is appropriate and, in the case of construction traffic, will be covered by planning controls. It is not anticipated that any vehicular traffic would access the Site via Akeman Street/Green Lane as this would be illogical on the basis that, unlike the existing golf course, there is no access proposed from Green Lane into the Site. I should also highlight that the Proposed Development include a new cycleway adjacent to the A4095 over a distance in excess of 600 metres and also a significant contribution of £70,000 towards improvements to cycle improvements between Site and Bicester. Both of these points appear to have been overlooked by Mr Reid.

Summary

- 5.51 In response to the objections raised by third parties, my evidence demonstrates that:
- ▶ The Proposed Development offers a genuine choice of sustainable modes of travel and will be sustainable in transport terms;
 - ▶ The proposed trip attraction and assignment methodology is robust and has been agreed with Officers at OCC and Highways England;
 - ▶ The Proposed Development will not result in a severe cumulative impact of the highway network local to the Site;
 - ▶ The proposed level of car parking provision is appropriate;
 - ▶ The proposed Site access junction has been designed in accordance with national guidance, will operate within capacity and without material queuing and is therefore appropriate to serve the Proposed Development; and,
 - ▶ The Proposed Development provides a betterment over existing facilities for pedestrians in the vicinity of the Site and provides new footway connections at the northern and southern ends of the PRoW, connecting into the wider footway and PRoW network, where pedestrians are currently required to walk within the carriageway or verge. To this extent the diversion of the existing PRoW across the Site does not result in a material disbenefit for pedestrians and PRoW users.

5.52 My evidence therefore demonstrates that the Proposed Development will provide appropriate access to sustainable travel choices, appropriate vehicle access can be achieved from the highway network and the Proposed Development will not result in any severe impacts on the highway network local to the Site. As such, the Proposed Development accords planning policies detailed in the Cherwell Local Plan and the NPPF.

6.0 Summary and Conclusion

Qualifications and Experience

- 6.1 My name is Phil Bell and I am a Director at Motion Consultants Limited, which I was jointly responsible for setting up in 2004. I am a member of the Institute of Logistics and Transport and of the Chartered Institution of Highways and Transportation. I have over 30 years' experience in the field of transportation planning, traffic engineering and highway safety, including in relation to major leisure and tourism schemes such as that proposed. I have also acted on other significant proposals in the Bicester area and am very familiar with the local area.

Scope of Evidence

- 6.2 My evidence focuses on the two reasons for refusal that directly relate to transport, namely reasons 2 and 3. I have considered these in the context of the Cherwell Local Plan along with the National Planning Policy Framework and National Planning Practice Guidance.

Reason for Refusal 2

- 6.3 Reason 2 alleges that the Proposed Development would be in a geographically unsustainable location with no access via public transport and would neither reduce the need to travel nor offer a genuine choice of alternative travel modes other than the private car.

- 6.4 This is incorrect for the reasons set out in my evidence, which can be summarised as follows:

- ▶ The Proposed Development include a wide range of enhancements to the local pedestrian and cycle network including new sections of footway on the A4095 and on Green Lane along with a contribution towards cycle improvements and a significant number of on-site cycle parking spaces.
- ▶ The Appellant has been fully committed to the provision of dedicated shuttle buses for both staff and guests from the outset. The staff shuttle bus will operate between the Proposed Development and Bicester, calling at the local rail stations, the town centre bus stops and the local centres around Bicester. The guest shuttle bus will focus on providing a connection between the Site and the stations, facilitating strong links to major towns and cities including London, Birmingham, Coventry and Reading. Indeed, it is estimated that in excess of 10 million people will be able to access the Site within 2.5 hours by public transport and the guest shuttle bus. A significant advantage of the private shuttle buses is that they will be versatile and can adapt to suit the needs of staff and guests. For example, the route of the staff shuttle bus can vary depending on where staff live and the guest shuttle bus can be timed to coincide with train times. The shuttle buses themselves will be low or ultra low emission vehicles.
- ▶ In addition to the shuttle buses, the Appellant has agreed to a request from Oxfordshire County Council for a £1.6 million contribution to fund a new public bus service linking the Site to Bicester town centre and railway stations.
- ▶ The use of electric vehicles, which are defined in the NPPF as a sustainable mode of transport, will be actively encouraged and at least 10% of the car parking bays will include charging points with the remainder of the spaces having the necessary infrastructure to enable them to be adapted at a later date as necessary.
- ▶ Car sharing is another sustainable mode of travel as defined by the NPF and the nature of the Proposed Development is such that families would typically arrive as groups with an anticipated car occupancy of at least three.
- ▶ Sustainable day passes will be offered to local residents at a discounted rate for those travelling to and from the Site using sustainable travel modes. This will also reduce the need for local people to travel further afield to comparable facilities.

- ▶ There will, of course, also be a Travel Plan secured by planning condition, which will promote sustainable travel choices among staff and guests as well as including a strategy for ongoing monitoring.
- 6.5 In relation to reducing the need to travel it is a matter of common sense that by their nature tourism and leisure destinations involve discretionary trips. Therefore, it is my view that to resist the Proposed Development on this basis would effectively place an embargo on such uses, which would be in conflict with policies in both the Cherwell Local Plan and the NPPF, both of which actively encourage leisure and tourism. It is also noteworthy that the Site is well located with respect to other complementary tourist and visitor destinations such as the City of Oxford, Blenheim Palace, the Cotswolds, Bicester Village and Bicester Heritage/Motion, thereby providing strong potential for linked trips.
- 6.6 Reason 2 also alleges that the private motor vehicles will access the Site utilising minor rural roads. This too is incorrect as the routes between the motorway network and the Site consist entirely of A and B class roads which, by definition, are appropriate for cross and inter-county movements. I do not consider these to be minor roads. I do acknowledge, however, that there has been some local concern in relation to the use of minor roads, such as the road through little Chesterton. This can and will be controlled through a coordinated signage strategy that will be secured by S106 obligation and which will afford full control to Oxfordshire County Council.
- 6.7 In relation to the matters covered by reason for refusal 2, I should emphasise that neither OCC (as local highway authority) nor Highways England (as strategic highway authority responsible for the M40) has raised any objection on these grounds.

Reason for Refusal 3

- 6.8 Reason for refusal 3 alleges that the information submitted at the time of determination of the planning application fails to demonstrate that traffic impacts are, or can be made acceptable, particularly in relation to the junction of the B4030 and B430 in the centre of Middleton Stoney some 3 kilometres by road from the Site.
- 6.9 In response to this my evidence demonstrates the following:
- ▶ My firm undertook extensive consultation with OCC starting well in advance of the submission of the planning application and continuing after the planning application was determined. The Transport Assessment that supported the planning application was prepared fully in accordance with the pre-application discussions.
 - ▶ Based on the Transport Assessment, it is anticipated that vehicle movements through the Middleton Stoney junction in the assessment year of 2026 will increase by around 1.4% to 2.2% during the peak hours, which equates to less than one vehicle per minute and is well within daily flow fluctuations. I consider that such an increase in traffic would be imperceptible and certainly not significant in the local context.
 - ▶ While unnecessary in my view, there is potential to adapt the signage strategy, which has the potential to roughly halve the Proposed Development traffic travelling through Middleton Stoney.
 - ▶ Notwithstanding the insignificant increase in traffic movements through Middleton Stoney, my firm has developed a mitigation strategy that takes full account of major development proposals at Heyford Park to the north-east of the Site. The Appellant is prepared to either implement or fully fund the mitigation scheme, which has the effect of adding an additional northbound lane at the junction. The analysis indicates that with the mitigation in place, the Proposed Development would have no significant impact on the operation of the junction and the safety of the junction would in fact be improved.
 - ▶ In correspondence towards the end of 2020, OCC raised some concerns in relation to road safety. In this regard, I should emphasise that the suggested mitigation works were subject to a Stage 1 Road Safety audit that raised 5 problems, all of which I consider minor in nature and capable of being addressed at the detailed design stage. Furthermore, I consider that the safety of the junction would in fact be improved as a consequence of the proposed improvements.

- ▶ Although I do not consider it necessary (for reasons already stated), even if there remained any residual concern about traffic generation through the junction in the morning peak, this residual concern can be addressed by a simple planning condition regarding check-in time for guests in the morning.

6.10 With the above in mind, I am in no doubt that the Proposed Development will not lead to either an unacceptable impact on highway safety or a severe impact in the road network.

Rule 6 Party Objections

6.11 Parishes Against Wolf (PAW) has raised a number of concerns, the most significant of which is the sustainability of the Site. This is covered in detail in my evidence and summarised above where I demonstrate that staff and visitors will have a genuine choice of alternative travel modes over the private car and that even guests using cars will be travelling in a sustainable manner as they are likely to be car sharing.

6.12 PAW raises other objections based on trip attraction, traffic impact, car parking provision, design of the access junction and the right of way diversion. My evidence responds to these points but, with the exception of traffic impact at the Middleton Stoney junction, I would highlight that these are not concerns that are shared by Cherwell District Council, Oxfordshire County Council or Highway England.

Conclusion

6.13 On the basis of my evidence, I am of the professional opinion that the Proposed Development fully accord with the Cherwell Local Plan and the NPPF and therefore should not be resisted or refused on highways or transport grounds.