



Proposed Great Wolf Lodge

Land to the East of M40 and South of A4095, Chesterton, Bicester

Great Lakes UK Limited

Planning Statement

November 2019

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EXECUTIVE SUMMARY

The Proposed Development will be developed and managed by Great Wolf Resorts, delivering a new type of indoor family resort, the first Great Wolf Lodge outside of North America.

Great Wolf Resorts' mission is to offer families a dynamic and unrivalled entertainment experience, with each moment designed for maximum fun. Great Wolf Resorts have grown to become North America's largest operator of waterpark resorts, and are an icon in the hospitality industry by offering everything under one roof – waterpark, hotel, restaurants, adventure games, attractions, family bonding experiences, arcades, retail and more. The focus of each Great Wolf Lodge is on families, being designed for children ages 2 to 12 (and their parents, guardians, carers and grandparents).

Consistent with its wider vision for the Site, and generally, Great Wolf Resorts have sought to undertake a high level of public engagement, reaching out to important local and regional stakeholders, including Bicester Vision, Bicester Chamber of Commerce and other local groups. This is in addition to an exhaustive pre-application programme with Cherwell District Council and Oxfordshire County Council officers and other statutory consultees, including local Parish Councils. This extensive process has shaped the scheme presented as part of this planning application.

The Proposed Development involves the development of part of an existing golf course delivering an exciting new indoor leisure resort comprising a 498-bed hotel, waterpark, restaurants, adventure games, attractions, family bonding experiences, arcade games, retail and more. The Proposed Development will provide extensive landscaping works, enhancing the existing landscaped context, and including a new circa 6 ha nature trail for public use.

The development will deliver significant economic, social and environmental benefits, including substantial and far-reaching investment in the area; creating a range of employment opportunities; generating additional local spin-off jobs and wider economic benefits created through demand for local goods and services in the area; delivering a new and exciting family leisure destination supporting district-wide tourist initiatives and providing access for local community use; and enhancing local access to new open space.

1. INTRODUCTION

1.1 This Statement has been prepared by DP9 Ltd ('DP9') for Great Lakes UK Limited ('the Applicant') in support of a planning application for the development of part of the existing golf course at Bicester Hotel, Golf and Spa ('BHGS') on land to the east of M40 and south of A4095, Chesterton, Bicester ('the Site') to provide a new leisure resort incorporating hotel, waterpark, family entertainment centre, conferencing facilities and restaurants with associated access, parking and landscaping ('the Proposed Development'). The formal description of development is set out below.

“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”

1.2 The Applicant company has been established for the purposes of the application and Proposed Development by Great Wolf Resorts who are seeking planning permission for a new leisure resort under the Great Wolf Lodge brand on the Site. Throughout this Planning Statement, 'Great Wolf Resorts' and 'the Applicant' are used interchangeably.

1.3 Great Wolf Resorts' mission is to offer families a dynamic and unrivalled entertainment experience, with each moment designed for maximum fun. Great Wolf Resorts have grown to become North America's largest operator of waterpark resorts, and are an icon in the hospitality industry by offering everything under one roof – waterpark, hotel, restaurants, adventure games, attractions, family bonding experiences, arcades, retail and more. The focus of each Great Wolf Lodge is on families being designed for children ages 2 to 12 (and their parents, guardians, carers and grandparents)

1.4 The Applicant's wider professional team has a track record of the delivery of successful schemes across England, and this experience has been drawn on in the evolution and development of the proposal.

1.5 This Planning Statement has been completed in order to explain the nature of the Proposed Development, assess its compliance with the National Planning Policy

Framework ('NPPF') and Development Plan policy and to demonstrate its acceptability.

The Scheme

- 1.6 The application seeks planning permission for the Proposed Development, which includes the construction of a 498-bedroom hotel, indoor waterpark, family entertainment centre, conferencing facilities and restaurants, with associated access, parking and landscaping
- 1.7 A key component of the Proposed Development is the extensive landscaping works proposed, enhancing the already substantial landscaping on the Site. This landscape-first approach is manifested in a dense landscaped buffer along the perimeter of the Site; a publicly-accessible nature trail area in the north-west quadrant of the Site; and landscaped car parking for guests and staff providing 902 parking spaces, including disabled spaces and electrical vehicle charging points. Further detail is provided in the plans and drawings forming part of this planning application and the supporting Design & Access Statement ('DAS'), prepared by architects, EPR, and landscape architects, BMD.
- 1.8 The Proposed Development, through the provision of a new hotel and leisure resort with extensive landscape improvements, will deliver the following significant economic, social and environmental benefits:
- Significant direct **investment** in Cherwell of £200m, reinforcing its position as an open and growing district and acting as a **positive catalyst for future investment** and development, particularly in the tourist sector.
 - Provision of an exciting **new family leisure resort, waterpark and hotel** designed for young families, complementing the existing offer in the area.
 - Provision of **discounted day passes**, designed to support local families in the wider Bicester area.
 - Delivery of a **high-quality development** including investment of over £1m in **new tree planting and landscaping**.

- Delivery of new **local employment opportunities**, with up to 600 permanent Great Wolf Lodge jobs (460 FTEs) created with further jobs created during the construction and fit out period.
- **Supporting local young people** with 42% of jobs targeted at those under the age of 21 offering **full lifeguard and hospitality training**
- Creation of significant **additional local spin-off jobs and wider economic benefits** created through demand for local goods and services in the area associated with increased visitor numbers and £4.9m of additional spend per year to the area.
- Commitment to working alongside and **supporting local and national charities** through partnerships, employment and apprenticeship opportunities and community events.
- Delivery of a **sustainable development**, incorporating sustainable design techniques and encouraging sustainable modes of travel, particularly for staff.
- Creation of a substantial new **public nature trail**, expressly for local residents', workers' and visitors' benefit.
- Delivery of a **new pedestrian footpath** from the resort into Chesterton village, aiding accessibility in the immediate area.
- Provision of **free-to-use shuttle bus services** for resort visitors, staff and Chesterton residents.
- **Protecting and enhancing local biodiversity** through extensive greening and ecological works.
- Generation of **substantial business rates contributions**, for local and regional benefit.
- Securing a **viable future for the BHGS golf club** and its members.

1.9 The planning application has been submitted in full to Cherwell District Council ('CDC') and seeks planning permission for the following development:

“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”

1.10 The planning application comprises the following:

- Completed application form, covering letter, ownership certificates and CIL form;
- Application plans and drawings, prepared by EPR;
- Design and Access Statement ('DAS'), prepared by EPR;
- Landscape Proposals (including landscape and planting plans), prepared by BMD;
- Landscape Maintenance and Management Plan, prepared by BMD;
- Environmental Statement ('ES') (see detailed breakdown below), prepared by WSP;
- Planning Statement, prepared by DP9;
- Draft Operational Management Plan, prepared by Great Wolf Resorts;
- Economic Statement, prepared by Volterra;
- Transport Assessment ('TA'), prepared by Motion;
- Framework Travel Plan, prepared by Motion;
- Framework Delivery and Servicing Management Plan, prepared by Motion;
- Flood Risk Assessment, prepared by Curtins;
- Drainage & SuDS Strategy, prepared by Curtins;
- Energy and Sustainability Statement (including BREEAM pre-assessment), prepared by Hoare Lea;
- Waste Management Strategy, prepared by WSP;
- Ventilation / Extraction Statement, prepared by Hoare Lea;
- Arboricultural Impact Assessment (including Tree Survey), prepared by WSP;
- Exterior Lighting Concepts Report, prepared by Hoare Lea;
- External Lighting Baseline Survey, prepared by Hoare Lea;
- Illumination Impact Profile, prepared by Hoare Lea;
- Utilities Statement, prepared by Hoare Lea;
- Draft Construction Management Plan, prepared by Arcadis; and
- Statement of Community Involvement, prepared by Redwood Consulting.

1.11 An Environmental Statement ('ES') has been prepared and coordinated by WSP, including specialist input from Volterra, Hoare Lea, Motion, AOC Archaeology, Curtins and BMD to assess the environmental implications of the Proposed Development. It comprises the following:

- Volume 1: Main ES chapters, coordinated by WSP:
 - Chapter 1: Introduction
 - Chapter 2: Approach to the Assessment
 - Chapter 3: Reasonable Alternatives and Design Evolution
 - Chapter 4: The Proposed Development
 - Chapter 5: Socio-Economics
 - Chapter 6: Transport and Access
 - Chapter 7: Air Quality
 - Chapter 8: Noise and Vibration
 - Chapter 9: Biodiversity (and Biodiversity Net Gain)
 - Chapter 10: Archaeology and Cultural Heritage
 - Chapter 11: Ground Conditions
 - Chapter 12: Water Resources, Flood Risk and Drainage
 - Chapter 13: Landscape and Visual Impact Assessment ('LVIA')
 - Chapter 14: Cumulative Effects
 - Chapter 15: Summary of Mitigation Measures
 - Chapter 16: Summary of Residual Effects
- Volume 2: Technical Appendices
- Volume 3: Non-Technical Summary

1.12 Against this background, this Planning Statement provides an overview of all aspects of the Proposed Development and an assessment of its appropriateness against the Development Plan and other material considerations. The scope of this Statement is as follows:

- Section 2 covers the Site context, describing the Site and the main features of the surrounding area.
- Section 3 sets out the Site's planning history.
- Section 4 summarises pre-application discussions and consultation.
- Section 5 describes the main components and features of the Proposed Development.

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- Section 6 outlines the relevant planning policy context of the Site and the Proposed Development and sets out a planning assessment of the Proposed Development against policy requirements.
 - Section 7 identifies the draft proposed planning obligations and Section 106 Heads of Terms.
 - Section 8 provides a summary and our conclusions on the Proposed Development.

2. SITE CONTEXT

- 2.1. The Site extends to 18.6 ha (186,000 sqm) and comprises the western nine holes of an existing 18-hole golf course forming part of the BHGS in Chesterton, a village to the west of Bicester. The extent of the red line is defined in the Site Location Plan, prepared by EPR, submitted with this planning application and shown as an extract below.

Planning Application Site:



- 2.2. As part of a course-wide reconfiguration, the eastern nine holes and the hotel and spa facilities associated with BHGS will remain in situ and continue to operate alongside the Proposed Development during construction and operational phases, should planning permission be granted. Further information on the Site included within the DAS.
- 2.3. The Site is located immediately to the east of the M40 (which runs south to north) and to the south of the A4095 (which runs east to west). The Site is located on the edge of Chesterton (approximately 500m from its centre), a village to the west of Bicester. The buffer between Chesterton and Bicester is protected in planning policy to ensure a degree of physical separation between the two settlements. The Site does not impact on this settlement buffer.

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- 2.4. The Site does not contain any buildings (and therefore no listed or locally listed buildings) and it is not located in a Conservation Area.
 - 2.5. The Site is not in the Green Belt, which covers an area to the south west of Bicester ending approximately 3km from the Site to the south of junction 9 of the M40 where it meets the A34 / A41.
 - 2.6. The interaction of the Proposed Development with relevant heritage assets and landscape views has been a central consideration in the evolution of the proposals and assessed in detail in the supporting Landscape Visual Impact Assessment ('LVIA') (prepared by BMD in conjunction with 3D Vista), appended to the ES, and in the DAS.
 - 2.7. To the north of the Site, north of the A4095, is a mix of agricultural land and Bignell Park Barns, which provides office accommodation, and a residential property. These land uses are accessed from the A4095 and the existing access arrangements have been carefully considered (with OCC input) as part of the proposals, and are not adversely affected. To the immediate east of the Site are buildings associated with BHGS (which will remain) as well as two residential properties, Stableford House and Vicarage Farm. Further east and along the A4095 is a further residential property, Tanora Cottage. To the south of the Site is car parking and other sports uses associated with and linked to BHGS. To the west of the Site is the M40 beyond which is a predominantly agricultural land with associated agricultural and residential properties. The Site context and neighbouring buildings and land uses are discussed in more detail in individual reports referring to those above and others as they are relevant to specific assessments.
 - 2.8. The Applicant recognises and is acutely aware of the context and, in particular, the need to ensure that the Proposed Development is acceptable in terms of any amenity impacts on nearby local residents (both in terms of physical / visible impacts and those relating to the activity associated with the proposed Great Wolf Lodge). This approach is carried through into every technical assessment completed with the outcomes and recommendations presented transparently and accurately across the suite of planning application documents.

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- 2.9. As stated, the Site is located on the western edge of Chesterton, located up against the M40 which forms the western boundary of the Site. The Site is approximately 1.3km from the edge of the westernmost part of Bicester and approximately 3km from Bicester town centre.
- 2.10. The Site is located wholly within Flood Zone 1 (land assessed as having a less than 1 in 1,000 annual probability of river or sea flooding (<0.1%)) and as such it has a low probability of flooding. The Site is also located outside the influence of any other local flood risk elements. Further detail and commentary is provided in the supporting Flood Risk Assessment, prepared by Curtins, and submitted in support of this planning application.
- 2.11. The Site is not within a specifically designated Archaeological Priority Area. That being said, the nearby (circa 2km from the Site) Alchester Roman Site is recognised and therefore a comprehensive assessment of below ground assets has been conducted pre-submission and is supplemented by ongoing field work assessment (in coordination with OCC officers) prior to a decision being made. Further information is provided in Volume 1, Chapter 10 and Volume 2 of the ES.
- 2.12. The Site is not within an Air Quality Management Area (AQMA). Chapter 7 of the ES assesses the impacts of the Proposed Development against relevant EIA criteria, as scoped with CDC officers, with the outcomes summarised later in this Planning Statement.
- 2.13. The above designations are discussed further later in this Planning Statement and as part of other supporting material prepared with this planning application.
- 2.14. The Site itself is not readily accessible by public transport but is on the edge of one of two main settlements recognised as being the most sustainable in Cherwell. A location such as the Site is unlike a number of other leisure destinations (such as Center Parcs, Alton Towers, or Silverstone for example) which are typically more, and sometimes significantly more, remote and less accessible. In fact, Chesterton as a whole suffers from poor levels of public transport accessibility, with only a single public bus service running daily through Chesterton (and in to Bicester town centre). Bicester, on the

other hand, benefits from excellent public transport services with two mainline train stations (Bicester North and Bicester Village) and a series of local bus services. The Proposed Development would deliver a free-to-use shuttle bus service with busses running between the Site, the two train stations, Bicester town centre and residential areas of Bicester and this would be freely available for Great Wolf Lodge guests and staff as well as Chesterton residents. Further details of the proposed shuttle bus service and the wider public transport context are included within the Transport Assessment submitted in support of the planning application. The Proposed Development would therefore significantly enhance the public transport facilities in Chesterton.

- 2.15. Further detail of the Site, the immediate context and uses and the wider area is included in the DAS and in the supporting plans and drawings submitted as part of this planning application. Where relevant, commentary on the surrounding context is provided in other supporting documents forming this planning application.

3. PLANNING HISTORY

- 3.1. The Site itself has a limited planning history. The Site is an established golf course and the most recent planning application relating to the Site was the July 2003 approval for alterations to the existing golf course and landscaping (CDC Reference: 03/01050/F).
- 3.2. The adjacent site, comprising the other 9 holes and main buildings of BHGS, has been subject to a series of planning applications most recently the October 2013 approval of a two-storey extension to the existing BHGS hotel to provide 51 additional bedrooms (CDC Reference: 13/01102/F).
- 3.3. The planning history demonstrates CDC's in principle support for hotel and leisure operation on this site (and for additional accommodation to that currently there).
- 3.4. Other planning applications, including the consented hotel extension to BHGS, are recorded in the ES under committed developments and are all factored in in terms of looking at any cumulative impacts associated with the Proposed Development. All assessments are therefore genuinely 'worst case'.

4. PRE-APPLICATION DISCUSSIONS & CONSULTATION

- 4.1. Prior to the submission of this application, the Applicant has undertaken extensive and detailed pre-application consultation with CDC, Oxfordshire County Council ('OCC') and key stakeholders, including the local community and statutory consultee groups such as Highways England, Natural England and the Environment Agency. This is summarised below:
- 4.2. In addition to early concept-stage engagement with CDC, the Applicant and supporting professional team has met with CDC seven times since March 2019, demonstrating the level of engagement with CDC officers to ensure that the Proposed Development responds to CDC's aspirations and planning policies for development in this location and that the scope of the planning application is agreed.
- 4.3. As part of these pre-application meetings, the proposed height, scale and massing of the Proposed Development has been a central discussion point, in particular how the proposed buildings would sit in the existing and proposed, enhanced landscape context. The proposed site layout has also been worked through at length in pre-application discussions to ensure the extent and quality of landscaping proposed is appropriate. The scheme has continued to evolve through pre-application discussions and the Applicant has lowered the height of the main hotel building and introduced further articulation, reduced the footprint of the built form and broken up the car park and reduced parking space numbers, responding to comments made.
- 4.4. The Applicant team has also worked closely with OCC (through pre-application meetings and conversations) to ensure that technical assessments, including transportation, archaeology and flood risk / drainage, have been appropriately and thoroughly assessed.
- 4.5. Regarding pre-application discussions with OCC's highways team, Motion has met with them on a number of occasions throughout the pre-application process to agree the methodology and scope of assessment and work through the assessment results.
- 4.6. As part of an extensive engagement process, a series of meetings with important local stakeholders, including Chesterton Parish Council, Bicester Vision and Bicester

Chamber of Commerce through to the submission of the planning application have informed the detailed design of the Proposed Development and the detail of meetings and summary of points raised are set out and discussed in the Statement of Community Involvement and the DAS.

- 4.7. In summary, the constructive responses received in relation to the nature and operation of the Proposed Development, the scale and massing and design detail have been taken on board by the design team and commentary relating to this as part of the design evolution of the Proposed Development is set out in the DAS. Particular focus has been had on the building's design and massing, noting the immediate constraints and the wider context, and trip generation, particularly car borne, associated with the Proposed Development, and how to manage this.
- 4.8. In addition to these pre-application meetings two sets of public exhibitions were held prior to the submission of this application. The first was held in June 2019 (14th and 15th at BHGS, Chesterton and 15th at John Paull II Centre, Bicester) and the second in September 2019 (26th at BHGS, Chesterton and 27th and 28th at John Paul II Centre, Bicester). Preview exhibitions were provided to local stakeholder groups in both instances.
- 4.9. These events were well attended with over 600 people attending overall (including repeat visitors) with a large number of local residents raising concerns about existing highways concerns and how the proposal would exacerbate these. It was also raised that the loss of part of the golf course was not welcomed and the scale of the proposals was not appropriate in this location. There was a general acceptance that the proposed nature trail and shuttle bus were positive and that the Great Wolf Lodge would bring beneficial relationships with local groups and suppliers and provide a boost to the local economy. This is substantiated in the Economic Statement prepared by Volterra and submitted with this planning application.
- 4.10. Further detail of the events, comments made and responses to questions raised are included in the Statement of Community Involvement prepared by Redwood Consulting. As part of the public exhibitions, the Applicant has been able to confirm that the Proposed Development will be managed through '24/7' onsite management;

that day passes will be provided; and that there will be active attempts to route visitor traffic through signage and booking information.

- 4.11. The Applicant has proactively engaged with a number of important local stakeholders and the Proposed Development (both the built form and landscaped areas) has been sensitively and contextually designed seeking input from local residents and community groups. Further details of this engagement approach, is set out in the Statement of Community Involvement prepared by Redwood Consulting.

5. APPLICATION PROPOSALS

- 5.1. The extent of the Proposed Development is set out in Section 1 of this Planning Statement, with additional and more detailed information in the application plans and drawings and DAS submitted as part of this planning application.
- 5.2. The Proposed Development will deliver a number of distinct public benefits, representing a significant investment in the area, providing jobs and wider spin off benefits; the delivery of a new family resort and hotel use (the first of its kind in the UK) to meet identified short stay and day visit needs; enhancing freely available public transport in Chesterton through connections into Bicester; and securing landscaping improvements including a publicly accessible nature trail on the site, for use by hotel guests and staff, local residents and school and charity groups.
- 5.3. Full planning permission is sought for the redevelopment of the Site for:

“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”

- 5.4. An approximate breakdown of the proposed floorspace across the distinct areas is set out below, recognising that the component parts in these areas bleed into one another. A detailed floorspace schedule for the Proposed Development is provided as part of the architectural material (namely in the DAS) with detailed floor layouts also submitted.

Breakdown of Proposed Floorspace

Resort Component	GIA	GEA
Hotel	27,250 sq.m	-
Indoor Waterpark	8,340 sq.m	-
Family Entertainment Centre, Food and Beverage, Conferencing and Back of House	12,350 sq.m	-
Total Floorspace	47,940 sq.m	52,685 sq.m

Hotel space includes hotel corridors, guest rooms, entrance lobby and reception

Food and Beverage space includes dedicated kitchens and preparation areas as well as public space

Back of house space includes servicing bay, storage areas, offices and plant areas

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- 5.5. The Proposed Development establishes a series of high quality conceptual architectural and landscape design and placemaking principles, namely creating a high quality built and landscaped environment, providing thought through and sensitive massing and articulation; incorporating attractive and appealing routes through public and guest spaces; and creating a purpose-built and functional resort whilst prioritising and responding to the wider context. Further detail on the design concept and evolution of the scheme is included in the DAS.
- 5.6. The landscape proposals are key to the success of the scheme. The spaces provided will help bring life to the currently mainly private site inviting activity from both hotel guests and the public who shall use the space.
- 5.7. The distinct component elements of the Proposed Development are below with further detail in relevant documents supporting the planning application, notably in the DAS and the Operational Management Plan.

Hotel / Entrance Lobby

- 5.8. 498 hotel rooms are provided on the Site. A variety of room sizes (and room themes) are available ranging from a typical family suite (6 bed spaces) to a Grizzly suite (8 bed spaces). The format of the hotel and resort is that the rooms are designed for whole families, staying on average 1 to 2 nights. The length of stay (and anticipated arrival and departures) is reflected in the technical assessment work that has been undertaken – namely in relation to trip generation and activity.
- 5.9. 51 (of the 498) rooms are accessible, representing over 10% of the provision. The mix of hotel rooms and those that are accessible is set out in more detail in the DAS.
- 5.10. The hotel lobby is an important feature of every Great Wolf Lodge and provides a large area that includes the typical hotel reception space (and associated facilities) alongside a central fireplace, which is used throughout the day for family activities from children dance parties, to story time before bed. Access to the lobby is provided from the main front door which leads out to the main car parking area.

Indoor Waterpark

- 5.11. The waterpark is the anchor of a Great Wolf Lodge and is designed by industry experts with experience in designing facilities internationally. The Proposed Development, as with every Great Wolf Lodge in the USA, will include a range of waterpark attractions (slides, rides, lazy rivers, toddler pools, wave machine) designed for use by the target audience of families with children between the ages of 2 and 12.
- 5.12. The plant equipment, including heating / cooling and water consumption and cleaning is all designed with efficiency in mind and the careful use of resources. Industry-leading equipment will be utilised as part of the Proposed Development and technical detail of the equipment used and an assessment of performance in line with policy requirements and guidance provided in supporting material.

Family Entertainment Centre

- 5.13. The Family Entertainment Centre (FEC) will provide a range of 'dry' family activities and food and beverage offer, including a children's rope course, arcade, bowling and interactive game (MagiQuest). The FEC is an indoor space sitting between the main hotel reception / lobby area and the entrance to the waterpark.
- 5.14. The FEC will also contain a number of food and beverage outlets for guests (with additional more formal provision provided adjacent to the hotel lobby). More detail is provided in the plans and drawings and the DAS.

Conferencing Facilities

- 5.15. Approximately 550 sqm GIA of conference space is provided in the conference centre, providing flexible meeting and conference rooms to accommodate different size groups. The conference facilities provided are designed to operate closely with the wider resort (and often relate to stays in the hotel) and the technical work (particularly in relation to trip generation) reflects this. The conference centre is supported by a small outdoor terrace looking west, beyond which is the public nature trails area.

Back of House

- 5.16. The back of house floorspace has been carefully designed to maximise its efficiency ensuring that adequate space is provided to support the functionality of the proposed building(s) and the mix of uses proposed.
- 5.17. Servicing will be carried out in a dedicated servicing area to the side / east of the proposed building (behind the eastern hotel wing). This space includes room for vehicle turning and will allow for delivery vehicles to be arriving / unloading / departing at the same time. As part of the servicing strategy, a dedicated area inside the building will contain waste management facilities such as compactors, and recycling storage areas. The servicing area will be managed by the Applicant at all times. Full details of the servicing arrangements are set out in the Waste Management Strategy and the Servicing and Delivery Plan submitted in support of this planning application.
- 5.18. Laundry facilities are provided on Site, representing an efficient approach to the operation of the proposed hotel and resort, both the hotel rooms and waterpark. This helps reduce the required numbers of trips to and from the resort.
- 5.19. The majority of plant space is at roof level over the Family Entertainment Centre and hidden behind plant screens on the roofs of the guestroom wings (with some enclosed at ground level, and some at basement level serving the water park) accessible from the main buildings and from the servicing area. Further detail is provided in the plans and drawings and DAS submitted with this application and the detailed material explaining the proposed energy strategy.

Nature Trails

- 5.20. As established earlier in this Planning Statement an area of circa 6 ha is provided for public use providing nature trails and areas for both hotel guests and members of the public (including Chesterton residents and school children). The nature trails are intended to provide public amenity (and genuine public open space) offering educational material informing users of the space about the local wildlife and habitats – which are being enhanced as part of the Proposed Development.

5.21. In terms of the proposed operating hours for various parts of the Proposed Development, this is summarised below with further detail provided in an Operational Management Plan, prepared by Great Wolf Resorts, submitted with this application.

Hotel (including guest services)	24 hours
Waterpark	Hotel Guests: 9am – 9pm Day Visitors: 10am – 9pm
FEC	Hotel Guests: 8am – 9pm* Day Visitors: 10am – 9pm*
Food & Beverage	Hotel Guests: 7am – 11pm** Day Visitors: 10am – 11pm
Nature Trail	6am – 9pm***

*specific activities may open later and close earlier

**24-hour F&B offer provided in one grab and go outlet

***Variation during winter periods expected

6. PLANNING POLICY CONTEXT AND ASSESSMENT

- 6.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 ('the 2004 Act') requires that planning applications are determined in accordance with the Development Plan unless material considerations indicate otherwise. This statutory duty is repeated at paragraph 2 of the National Planning Policy Framework ('NPPF') (2019). The Development Plan for the Site, to which full weight can be attached, comprises the Cherwell Local Plan Part 1 ('CLP1') (2015) and the saved policies of the Local Plan (1996).
- 6.2. Consultation on the draft Partial Review of the CLP1 ('Unmet Housing Needs') ran until October 2017 and was submitted for Examination in Public in March 2018 ahead of Hearing sessions taking place in February 2019. Following the July 2019 publication of the Inspector's Post Hearing Note, adoption is expected at some point within the next 6 months.
- 6.3. An early 'issues' consultation draft of the Cherwell Local Plan Part 2 ('CLP2') took place in January 2016. Further consultation on the CLP2 is not expected until later in 2019 following the conclusion of the CLP1 review.
- 6.4. The Oxfordshire Plan 2050 is also being prepared as a joint statutory spatial plan between CDC, OCC, Oxford City Council, South Oxfordshire District Council, Vale of White Horse District Council and West Oxfordshire District Council. A 'call for ideas' draft was published for consultation in March 2019 and it is anticipated that a further draft will be consulted on in Spring 2020 for submission to the Planning Inspectorate ahead of a targeted March 2022 adoption date. At that time it will become part of the Development Plan. On the basis that this is an early draft and has not been subject to full consultation or Examination in Public, limited weight is given to these policies, although the Oxfordshire Plan represents a clear indication as to the strategic policy aspirations and intentions of CDC.
- 6.5. In March 2014, the Government launched the Planning Practice Guidance ('PPG') as an online web-based resource that is regularly updated. This is a material consideration in planning decisions. Relevant parts of the current PPG are referred to in supporting technical documents.

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- 6.6. A detailed review of each of the Development Plan documents and planning policies therein as well as relevant parts of the NPPF (2019) is set out in **Appendix 1** with references to it included later in this Section
- 6.7. This section now outlines an assessment of the Proposed Development against the planning policy context identified in Section 6 and set out in further detail in Appendix 1. Reference is made to the DAS, plans, drawings and other consultants' documents submitted in support of the planning application where more detail can be found.

Decision-Making Approach

- 6.8. The Development Plan, on the basis that it is up to date and can be afforded full weight, forms the primary consideration for the planning application. This should be assessed alongside the NPPF, to which significant weight should also be attached.
- 6.9. The approach to assessing the Proposed Development should be based on the land uses proposed and whether it accords with the Development Plan; if it does, then it has the benefit of the statutory presumption in section 38(6) of the 2004 Act. If not, then it is necessary to consider whether there are any other material considerations, such as the NPPF, which indicate that the planning application should be determined otherwise than in accordance with the Development Plan.
- 6.10. As established below, the Proposed Development is supported by the Development Plan, namely that it accords with CLP1 policies, and that on the basis of the Development Plan being up to date it meets the requirements of section 38(6) of the 2004 Act. Notwithstanding this and in addition to being in accordance with the Development Plan, considering the NPPF, it is informative to consider whether the Proposed Development constitutes sustainable development, thus benefitting from NPPF paragraph 11 presumption in favour of granting planning permission.
- 6.11. The Proposed Development represents sustainable development for reasons which are summarised below, responding to paragraph 8 of the NPPF, and further supported in the comprehensive technical material that is submitted in support of this planning application. Referring to paragraph 9 of the NPPF, the Proposed Development

appropriately *“take[s] local circumstances into account, to reflect the character, needs and opportunities of [the] area”*.

- **Economic Role:** the Proposed Development will contribute towards reinforcing a strong, responsive and competitive economy through the delivery of a new family leisure resort representing what is considered to be the right mix of uses in the right place at the right time *“to support growth”* (NPPF paragraph 8), complimenting the ongoing and forecast growth in the wider Bicester area. The Proposed Development will lead to a substantial increase in both direct and indirect job creation, and associated increases in footfall, activity and local expenditure which will in turn help support local businesses in the vicinity, with wider consequential benefits on businesses and supply chains. The Proposed Development meets identified local needs in terms of hotel accommodation, targeted towards the young family demographic (directly correlating to and serving forecast growth in the area). As such, the proposals are consistent with the NPPF and the Development Plan including, but, not limited to, CLP1 Policy SLE3.
- **Social Role:** the Proposed Development will directly *“support communities’ health, social and cultural well-being”* through the introduction of a new family resort for hotel guests and local day visitors and a package of other local commitments, namely a free shuttle bus (for local residents as well as visitors to the resort), an enhanced and useable re-routed public right of way and new public nature trail (delivering improved local access to genuinely public open space). Through the landscape-led design approach adopted, the Proposed Development will create a high quality built and natural environment, acting as a catalyst to future high quality investment in the area, especially in terms of public realm, permeability and legibility improvements. Furthermore, the design of the resort and the public spaces across the Site ensures that it is inclusive and accessible to all. This accords with the NPPF and the Development Plan, including CLP1 Policies SLE4, BSC10 and ESD15. It also accords with and in some instances exceeds national best practice guidance and building control requirements.
- **Environmental Role:** the Proposed Development, whilst representing important economic and social investment in the area, places a large emphasis on enhancing

the natural environment. This is achieved firstly through making effective use of land currently in a leisure / recreational use for a similar, albeit anticipated to be more popular, use. The Proposed Development also delivers ecological and biodiversity improvements; employs sustainability principles and using natural resources prudently; and circular economy principles including minimising waste. The Proposed Development seeks to encourage sustainable modes of transport, namely using public transport (connecting with the excellent public train network in nearby Bicester through the provision of free-to-use shuttle busses, which the Applicant would be happy to explore being electric if viable and available at the time of opening), a new accessible shared footpath / cycleway into Chesterton village and an overprovision of cycle parking for resort staff. The historic and built environment will be preserved and, where possible, enhanced as a result of the landscape-led approach which invests heavily in new planting and hard and soft landscaping and the high level of design quality applied to the proposed building. The impact that the Proposed Development will have on the landscape and identified heritage assets is acceptable in planning terms. As such the Proposed Development is consistent with Chapters 15 and 16 of the NPPF and the Development Plan. The proposals have also been rigorously tested to demonstrate their consistency with design policies (including CLP1 policies ESD13 and ESD14) set out in the Development Plan and the NPPF. Further detail relating to this is provided in the DAS and Environmental Impact Assessment, namely the LVIA.

6.12. Having presented that the Proposed Development is considered to be acceptable in principle, this Statement now addresses specific development management matters identified during pre-application discussions, with the key issues to be tested being:

- Loss of existing use;
- Appropriateness of proposed use;
- Landscape and visual impact;
- Design approach (scale, height and massing);
- Heritage considerations (above and below ground);

- Transport and accessibility;
- Energy and sustainability;
- Flood risk and drainage;
- Amenity considerations;
- Biodiversity and ecology; and
- Other relevant planning considerations.

Loss of Existing Use (incorporating Open Space Assessment)

- 6.13. As set out in Section 2 of this Planning Statement, the Site currently comprises part of an existing golf course. This existing golf course, part of BHGS, is associated with the hotel, leisure and spa offer, all of which would remain in situ alongside the Proposed Development. The golf course would then turn into a nine-hole course, comprising the existing holes 1 to 9. It is acknowledged that the proposed re-purposing of part of the golf course (holes 10 to 18) needs to be justified in accordance with national and local planning policy, on account of it being considered as 'open space'.
- 6.14. The NPPF defines 'open space' as *"all open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity"*. PPG adds to this stating that open space *"includes all open space of public value, [and] can take many forms, from formal sports pitches to open areas within a development, linear corridors and country parks"* (Paragraph: 001 Reference ID: 37-001-20140306) and that *"it is for local planning authorities to assess the need for open space and opportunities for new provision in their areas"*.
- 6.15. CDC take a similar approach in defining 'open space' with CLP1 referring to it in a number of ways including as greenspace, play space, allotments, outdoor sports pitches and parks and gardens. The role of the Application Site as an 'open space' and one that provides a sport and recreation function is important to consider when

assessing the appropriateness, in planning terms, of the Proposed Development (which results in a demonstrable net gain in accessible public open space).

Cherwell Local Plan Part 1

- 6.16. CLP1 Policy BSC10 strategically aims to, *“ensure that sufficient quantity and quality of, and convenient access to open space, sport and recreation provision is secured”*. In terms of considering the reconfiguration of the existing provision, this policy looks to achieve this through *“protecting existing sites”*.
- 6.17. Supporting text to policy BSC10 states that CDC’s 2006 ‘Open Space, Sport and Recreational Facilities Needs Assessment Audit and Strategy’ (‘2006 Audit’) and 2008 ‘Cherwell Green Spaces Strategy’ (‘2008 GSS’) identify all the sites that need to be protected *“to ensure an adequate supply of open space provision”* (paragraph B.158). It is noted here, with greater detail to follow, that the BHGS, containing the Site, is not identified as a site / course that needed protection, at the time of these research pieces. A more recent Sports Facilities Strategy, prepared by Nortoft Partnerships Ltd and published in August 2018 (‘2018 SFS’), forms Part 2 of CDC’s Open Space, Sport and Recreation Assessment and Strategies (‘OSSRAS’). The 2018 SFS / OSSRAS have been prepared to inform future policy documents and planning decisions, namely the CLP2, and represents the most up-to-date CDC evidence. We recognise that the 2018 SFS states that generally *“... existing golf course sites should be protected, unless the tests set out in the National Planning Policy Framework are met”* (paragraph 11.58) and that in the ‘Bicester sub area’ there is need up to 2031 for *“1 x 18-hole course or 2 x 9-hole courses, 8 driving range bays”* (paragraph 11.54). These conclusions are discussed further below.
- 6.18. Supporting text to policy BSC10 is clear that *“development proposals that would result in the loss of sites will be assessed in accordance with guidance in the NPPF and NPPG...”* identifying three scenarios, one of which needs to be satisfied to make the loss or reconfiguration of that site to another use acceptable:

“... [the loss] will not be permitted unless the proposal would not result in the loss of an open space of importance to the character or amenity of the surrounding area; an assessment has been undertaken which demonstrates

that the site is surplus to requirements including consideration of all functions that open space can perform; or the Council is satisfied that a suitable alternative site of at least equivalent community benefit in terms of quantity and quality is to be provided within an agreed time period” (paragraph B.159) (our emphasis).

- 6.19. It is important to note at this stage that whilst the proposals result in a “*loss of open space*”, most of this is private and for BHGS members only and therefore not strictly meeting the NPPF definition of being of ‘public value’. Moreover, the Proposed Development retains a 9-hole golf course, which will remain in situ, and the proposals on the Application Site include substantial soft landscaping works creating almost 5.8ha of genuine public open space (i.e. that which is publicly accessible and is therefore of public value). Purely considering the ‘open space’ value of the existing and proposed situations, the Proposed Development secures an uplift in open space of public value.
- 6.20. Notwithstanding the above, considering the scenarios (or tests) established through policy BSC10 and the first of these it is considered that the proposals would not result in the loss of an open space that is of importance to the character or amenity of the surrounding area. Considering the character of the area, the ‘open space’ element of the Site is largely unseen and, importantly, is located adjacent to both the M40 and A4095. The LVIA supporting this planning application reiterates this point (“*the Site is largely visually contained from the wider landscape context due to the combined influence of gently sloping landform, dense boundary vegetation and screening provided by strong areas of vegetation in the surrounding landscape – including that of the southern half of the golf course, outside the Site boundary*”). It is relevant to reiterate the aforementioned point that in terms of the contribution to the amenity of the area, the limited access that the general public has to the Site (holes 10 to 18) means that it offers only limited amenity. The amenity provided by the private golf course is changed, from an 18-hole course to a proposed 9-hole course, although this is not necessarily considered to be a detrimental ‘loss’, on account of the potential for 9-hole golf to offer greater amenity value to a wider spectrum of the local population.

It is therefore a viable and preferable reconfiguration of the golf course and the amenity it offers. This is explored and explained further below.

- 6.21. Considering the second test, and the requirement for an assessment to demonstrate that the site is surplus to requirements, we acknowledge that the 2018 SFS forecasts that up to 2031 there is additional need in the 'Bicester sub area' for *"1 x 18-hole course or 2 x 9-hole courses, 8 driving range bays"* (paragraph 11.54). This is stated as being based on economic conditions remaining *"similar or better than today"* and increasing housing numbers in Cherwell and surrounding authorities (ibid.). As required by policy BSC10 the Applicant has commissioned CBRE to undertake a thorough empirical assessment of the SFS 2018 work and a new assessment of golf course needs in the area. This is included at **Appendix 2** to this Planning Statement. CBRE question some of the assumptions used in the 2018 SFS for catchments, demographics of this catchment and the provision in 'surrounding authorities' (used in the 2018 SFS), and concludes that there is an over-supply of 18-hole golf courses in the District, especially in the Bicester sub area, and, importantly, that the demand is falling in the catchment of the BHGS course (reflected by membership numbers over the past 20+ years falling).
- 6.22. As we consider the potential for the 18-hole golf course to be surplus to requirements, it is important to note that the Proposed Development would provide a new 9-hole course and, in so doing, respond to earlier commentary in the 2018 SFS and CBRE work at Appendix 2 about offering flexibility in membership options and course formats and better meet existing and forecast demand in the area.
- 6.23. The Proposed Development, namely the reconfiguration of an 18-hole golf course (and replacement with a 9-hole golf course, enhanced public space and new family leisure resort), is considered to be entirely appropriate against both of the scenarios or tests of policy BSC10 which would both justify its loss. As such the partial reconfiguration of the golf course use is acceptable in planning terms and there is also no need to propose a re-provision of facilities (especially considering the points made on there being an oversupply).

- 6.24. As referenced previously, the 2018 SFS concludes with a recommendation – to Cherwell District Council – that *“the existing golf course sites should be protected, unless the tests set out in the National Planning Policy Framework are met”* (paragraph 11.58). Notwithstanding the points raised above (questioning some of the pertinent conclusions of the 2018 SFS), the NPPF tests are discussed below.

National Planning Policy Framework

- 6.25. For context, paragraph 92 of the NPPF identifies a series of tests to protect those services that provide a specific community role, with points (c) and (d) being relevant to a development of the nature proposed:

“To provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:

(a) plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments;

(b) take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community;

(c) guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community’s ability to meet its day-to-day needs;

(d) ensure that established shops, facilities and services are able to develop and modernise, and are retained for the benefit of the community; and

(e) ensure an integrated approach to considering the location of housing, economic uses and community facilities and services”

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- 6.26. Considering point (c), the CBRE report identifies that local needs for golf course use would not be harmed and that, in fact, through the creation of a 9-hole course, the proposals would help meet existing and forecast empirical need in the area.
- 6.27. Referring to point (d), the existing golf course as an 'established facility' is retained for public benefit through its modernisation (namely to become a 9-hole golf course and secure investment in this). This will ensure its continued benefit to the local and wider community, and importantly to a more diverse group who would otherwise not consider 18-hole golf as accessible (referring to the conclusions of the appended CBRE report). The proposals also deliver significant recreational space across the Application Site – namely the new public nature trail and enhanced Public Right of Way, both of which are significant benefits in terms of consideration of paragraph 92 of the NPPF and are designed to be used by the local community. Importantly, as a recreational facility (NPPF terminology which does not differentiate between such facilities), the proposed Great Wolf Lodge is itself also a benefit and would expect to serve a greater number of people, especially families, in the Chesterton area and the wider Bicester area.
- 6.28. NPPF paragraph 96 adds that: *“access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities. Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate”*. Whilst the 2018 SFS can be considered 'up-to-date', the CBRE report (October 2019) provides a more comprehensive, focussed and therefore robust assessment of need for golf courses in the area. This identifies that there is a surplus provision (or over supply) of 18-hole golf courses in the area, when considering forecast use and empirical trends. This also identifies that, owing to changes in the demand for golf as a recreational / leisure activity, the requirements for 9-hole golf courses exist and this is something that the proposals would help to deliver.

- 6.29. We are led to conclude therefore that the opportunity for sport and physical activity for golf use is not harmed and, importantly, the Proposed Development offers significant wider gains– associated with the indoor water park use (which offers day passes and with local discounts encouraging local use) and the public space offered through the nature trails.
- 6.30. As identified in CDC pre-application feedback, NPPF paragraph 97 sets establishes the important requirements that *“existing open space, sports and recreational buildings and land, including playing fields, should not be built on”* unless one (or more) of three tests are met, namely that:
- “(a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or*
- (b) the loss resulting from the Proposed Development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or*
- (c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.”*
- 6.31. Considering point (a), as identified in the CBRE report appended to this Planning Statement and commented on previously, the existing 18-hole course offers only limited use and a 9-hole golf course would more closely align with existing and forecast demand that they have quantitatively assessed. In addition, and through the creation of a 9-hole course, meeting identified needs, and of course the provision of a new hotel and waterpark (offering family sports and recreation facilities) and public nature trails, the proposals would deliver a net increase in alternative sports and recreational provision, which are considered to clearly outweigh the loss of the current or former use and as such would satisfy point (c) of NPPF paragraph 97.
- 6.32. It is acknowledged that the Site is of some value in terms of its recreation offer and that it is open space. Considering the specific policy tests set out in CLP1 (Policy BSC10) and the NPPF, its reconfiguration, or loss in planning terms, is considered appropriate on the basis of its current under-utilisation (especially its limited value to the local

community and demographic mix in the area); the wider provision of 18-hole golf courses in the area (which satisfy demonstrably low and falling demand); the limited value to the public of the 9-holes to be lost in terms of amenity value and accessibility; the proposed creation of more inclusive and in-demand 9-hole golf course; and the net gain in recreation and leisure offer of the Proposed Development and waterpark resort and public nature trails offered. Importantly this net gain represents a significant qualitative and quantitative increase in publicly accessible open space, thus satisfying point (b).

Appropriateness of Proposed Use

- 6.33. The Proposed Development comprises a new leisure family resort and hotel, representing a significant positive investment in the local area in terms of job creation and financial spin-offs, and the creation of a new tourist attraction in the district and in the wider Bicester area in particular. As identified earlier in this Planning Statement and in the wider planning application material, the Proposed Development is a new hotel format being the first Great Wolf Lodge in the UK, with a particular focus on young families. The Proposed Development represents a flagship resort for the Applicant and as such the scale or critical mass of the development is an operational requirement in this new market, and represents the latest in terms of the Great Wolf Lodge experience. It is worth adding that it is not in direct competition with other destinations (such as Bicester Village, Bicester Motion and BHGS) or visitor accommodation in Bicester and surrounding villages, being complementary to the existing and emerging tourist offer in the wider area.
- 6.34. Considering the specific policy tests, the CLP1 recognises the *“growing role that tourism has to play in the local economy”* (paragraph B.62 supporting text to policy SLE3) adding that CDC *“will support new tourism provision that can demonstrate direct benefit for the local ‘visitor’ economy and which will sustain the rural economy”* (ibid.) and that *“... tourism has scope to play a significant wealth-creating role for the District”* (paragraph B.63). In addition, and of importance in the consideration of the Proposed Development, the CLP1 is clear that *“tourism can help support local services and facilities, provide employment, promote regeneration and help preserve the natural and historic environment. It can include day visits by local people through to*

visits from overseas. Tourism is a vital component in the make-up of the national economy. Currently tourism is worth over £300 million in Cherwell District and makes a significant contribution towards the development of a sustainable local economy” (paragraph B.64).

- 6.35. In this location, the Proposed Development must demonstrate that it is acceptable against specific policy tests, namely that it can be classed as being in a sustainable location; that it is appropriate in the open countryside; and that as a main town centre use the out of centre location is acceptable. These ‘tests’ are now considered in turn.

The Application Site as a Sustainable Location

- 6.36. Establishing this context, CLP1 policy SLE3 clearly and conclusively states 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”*. The Proposed Development delivers the strategic goals and is therefore acceptable on that level although it is subject to demonstrating that the Application Site is or can be promoted as a ‘sustainable location’.
- 6.37. Policy SLE3 does not define what a sustainable location is in terms of tourism uses as it does for say employment (paragraph C.100 or C.154 C.195) or housing development (paragraph C.136, C.138 C.272). There is reference that tourism development should focus on *“maintaining village services and facilities”* and *“the preservation and enhancement of the historic environment in both towns and villages”*. In terms of a wider definition, the CLP1 clearly identifies ‘sustainable locations’ for growth more generally (referring to policy ESD1) and a statement that Bicester and Banbury are *“the most sustainable locations for growth in the District...”* (paragraph C.4), suggesting that the towns are the focus (‘the most’ sustainable location) but not the location where all development in the decidedly more rural District should and will come forward. Strategic Objective 4 (p.35 of the CLP1) talks about focussing development in sustainable locations *“making efficient and effective use of land, conserving and enhancing the countryside and landscape and the setting of its towns and villages”*. When considering this context, specifically the Site’s proximity to

Bicester as one of two of the “*most sustainable locations*” in the district, and the public transport proposals delivered through the scheme, the Site is viewed as being in a sustainable location.

- 6.38. Referring to a more general NPPF definition of what a sustainable location is, it would mean developing in a location that meets “*the needs of the present without compromising the ability of future generations to meet their own needs*” (NPPF paragraph 7). This has economic, social and environmental connotations and refers to protecting the existing integrity of the area (namely Chesterton village and Bicester area) whilst enabling new leisure, recreation, social and economic opportunities for the definable affected population.
- 6.39. It is relevant to note that the Proposed Development genuinely provides sustainable transport options even though a resort as with most tourist attractions are inevitably skewed to those coming by car. This is recognised in the context of CLP1 policy SLE3 whereby the promotion of new tourist attractions and development in Cherwell is looking to capitalise on the fact that “*1.2 million people live within a 30-minute drive time of the District boundary*” (paragraph B.64, our emphasis). A more detailed review of these points is included later in this Section of the Planning Statement concluding that through the provision of a new fully accessible shared footpath / cycleway into Chesterton village and a free-to-use shuttle bus to / from the resort and through and to Chesterton and Bicester (connecting to the mainline railway stations) genuine options are provided for hotel guests, day pass visitors and resort staff to travel by non-car modes. These also provide opportunities for local residents to travel more sustainably as the path / cycleway and shuttle bus are available to them too.
- 6.40. Considering the definition of what makes a location sustainable, the Proposed Development delivers a new leisure resort and hotel with extensive associated benefits in a location that does not compromise the gamut of future generations’ needs, protecting the natural and built environment of Chesterton and offering genuinely sustainably access to visitors and staff. Considering the context outlined in this section, the Site is a sustainable location, and the most sustainable in Cherwell (and beyond) for the land use proposed, being on the edge of a growth settlement and for a resort of its type in an equivalent or much more sustainable and accessible

location than others (considering the likes of Center Parcs, Alton Towers, Silverstone or Legoland, for example). On this basis, CLP1 policy SLE3 states that the Proposed Development should therefore be supported.

Development in the Open Countryside

- 6.41. A further consideration in terms of the appropriateness of the proposed use is saved policy T5 of the 1996 Local Plan. Whilst this is over 20 years old as a policy (and superseded by the CLP1 and the NPPF) it states that *“beyond the built-up limits of a settlement the provision of new hotels ... will generally only be approved when such proposals would: be largely accommodated within existing buildings which are suitable for conversion or for such use; or totally replace an existing commercial use on an existing acceptably located commercial site”*. The policy goes on to say that *“proposals to extend existing hotels, motels, guest houses and restaurants will be acceptable provided they conform to the other relevant policies in this plan”*.
- 6.42. The premise for the policy is to protect the open countryside with the supporting text clearly acknowledging that *“such proposals will need to be evaluated on the basis of their individual merits and the degree to which they conflict with other policies in this plan ... [recognising] ... that there may be exceptional circumstances that would justify setting aside policy T5 to allow the development of facilities of this kind”* (paragraph 7.17). The supporting text goes on to say that where in the green belt (which the Site is not) such development is not accepted and that there is a general requirement that such development is adequately served in terms of roads and access and that it can be *“readily assimilated in the rural landscape without undue harm to its appearance and character”* (ibid.).
- 6.43. It is first important to recognise that the Proposed Development whilst outside of a defined settlement (and therefore in Open Countryside) is on the edge of a growth settlement (Bicester being the fastest growing town in Western Europe – something that is supported in national, regional and local policy).
- 6.44. Notwithstanding, the Proposed Development, as a new hotel (and resort), partially replaces an existing commercial use – being the golf course – and owing to its location next to the M40 and almost entirely shielded from view currently and in a proposed

scenario, the scheme is not considered to result in 'undue harm' to the landscape, as is the key test. Further detail is provided in the LVIA concluding that whilst there are some views (which are assessed in terms of sensitivity and impact, *"the Site is largely visually contained from the wider landscape context due to the combined influence of gently sloping landform, dense boundary vegetation and screening provided by strong areas of vegetation in the surrounding landscape – including that of the southern half of the golf course, outside the Site boundary"*). Related to the principle of developing in a rural setting, NPPF paragraph 83 states that planning decisions *"should enable sustainable rural tourism and leisure developments which respect the character of the countryside"*. The Proposed Development is considered to appropriately respect the character of the countryside (justified through the LVIA) and as such the proviso to 'enable' the scheme is engaged.

- 6.45. The NPPF goes on to say that, 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"* (paragraph 84).
- 6.46. Through this planning application it is demonstrated that the Proposed Development sitting outside of the settlement boundary of Chesterton, yet before the hard edge of the M40 as a boundary, is sensitive to its surroundings, is acceptable in terms of the impact on the local road network and promotes guest and staff access by foot, cycle and public transport. The Proposed Development replaces an existing commercial leisure use (ie part of the 18-hole golf course) and, moreover, the wider BHGS is an established hotel resort that CDC has recently approved extensions to. The principle of such a use in this location has been firmly established and is recognised in the adopted Development Plan.

- 6.47. On this basis, the Proposed Development is not considered to conflict with any policies controlling or preventing development in the Open Countryside.

Out of Centre Location

- 6.48. The Proposed Development comprises an indoor waterpark and hotel resort, which is considered to be a 'main town centre use' in terms of the NPPF definition which includes leisure, entertainment, sport and recreation and hotel uses (Annex 2: Glossary). As a result of the Site's out-of-centre location in retail planning terms, paragraphs 86, 87 and 89 of the NPPF are relevant. These set out the sequential and retail impact tests for proposals outside of defined centres and are consistent with the requirements of CLP1 policy SLE2.

Sequential Test:

- 6.49. In terms of the sequential test, paragraph 86 requires applications for main town centre uses to be located in centres, then in edge-of-centre locations and then out-of-centre locations. Paragraph 87 adds that when considering edge and out of centre sites, "*preference should be given to accessible sites which are well connected to the Town Centre*". The application of the sequential test is consistent between the NPPF and CLP1 policy SLE2.
- 6.50. As per PPG ("*the sequential test should recognise that certain main town centre uses have particular market and locational requirements which mean that they may only be accommodated in specific locations*", Paragraph: 012 Reference ID: 2b-012-20190722) and case law (Tesco Stores v Dundee [2012] UKSC 13, and R (Zurich Assurance Ltd t/a Threadneedle Property Investments) v North Lincolnshire Council [2012] EWHC 3708 (Admin)), it is accepted that the specific operational and business requirements need to be understood and acknowledged in terms of considering sites that could accommodate the Proposed Development for the purpose of satisfying the sequential test. The Applicant has specific requirements which have led them to the selection of and promotion of the Proposed Development on the Application Site. These are summarised below:

- Located 90 minutes drive time from London and Birmingham

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

6.51. It is not considered appropriate to disaggregate the proposed resort into its constituent components on the basis that they are all core parts of the Great Wolf Lodge experience and could and would not exist in isolation from one another.

6.52. For Great Wolf Resorts, deviation from the proposed resort parameters will impact upon its established business model and affect the ability to provide a resort that can operate successfully, delivering the wider benefits to the area. The need to explore and accept compromise in achieving flexibility under the sequential approach is however recognised, but only where this will not affect viability. The ability to sustainably reduce the site parameters and location are therefore limited.

6.53. However, and in accordance with the NPPF and PPG, flexibility has been sought in terms of applying the Applicant's specific site criteria established above as such an assessment of sequential sites has been undertaken against the following parameters:

- Located 120 minutes drive time from London and Birmingham
(30% further than the Applicant's identified viable catchments)
- Approximately 6ha with a relatively level topography
(50% of the Applicant's requirement, needing decked car parking and hotel, neither are viable)
- Not necessarily concealed with no consideration for nearby sensitive receptors nearby
(for the assessment to consider these for each site)
- Proximity to and ability to connect to public transport infrastructure
(inappropriate to apply flexibility to this point)

- Main road proximity / visibility and ease of access
(inappropriate to apply flexibility to this point)
- Not focused on M40 corridor location
(overlooking the Applicant's initial investigation into the UK identifying this route)
- Proximity (within 30 minutes drive time of the site) to population of 30,000 plus providing local workforce
(inappropriate to apply flexibility to this point)

6.54. Against this background, an assessment of sequential sites has been undertaken, considering whether there are any suitable, available and viable sites within or on the edge of a series of town centres agreed with CDC officers, namely:

- Abingdon (Vale of White Horse District Council)
- Aylesbury (Aylesbury Vale District Council)
- Banbury (Cherwell District Council)
- Bicester (Cherwell District Council)
- Buckingham (Aylesbury Vale District Council)
- Leighton Buzzard (Central Bedfordshire Council)
- Milton Keynes (Milton Keynes Council)
- Newport Pagnell (Milton Keynes Council)
- Oxford (Oxford City Council)
- Towcester (South Northamptonshire Council)

6.55. An assessment of in centre and edge and out of centre sites in each of these towns is set out in **Appendix 3** of this Planning Statement. Notwithstanding the high degree of flexibility applied, in the absence of any suitable opportunities within these town centres (or in well-connected edge or out-of-centre locations), the Site is considered a preferred location in planning policy terms for new 'main town centre use' floorspace.

6.56. It is worth noting that CDC has in the recent past approved edge and out of Centre schemes (for smaller development) in the District, including Bicester Gateway Retail Park (now Kingsmere Retail Park), Banbury Gateway Shopping Park and Bicester

Heritage / Motion, concluding that there were no sequentially preferable sites (for smaller development) in and on the edge of these town centres.

- 6.57. Following this assessment, it can be concluded that the Site forms the most appropriate location for the Proposed Development, and as such complies with the requirements of the sequential test as set out in the NPPF paragraph 86 and CLP1 policy SLE2.

Impact Assessment:

- 6.58. As per paragraph 89 of the NPPF, impact assessments are required for proposals outside of centres where above a locally set threshold (or where over the 2,500 sq.m gross threshold if there is not a locally set level), with consideration of the impact on investment in a centre or centres in the catchment area of the proposal; and the impact on centres' vitality and viability, including local consumer choice and trade in the centre and wider area. As the Proposed Development comprises a quantum of floorspace over the locally set threshold in CLP1 policy SLE2 (of 1,500 sq.m gross), an impact assessment is required to be undertaken.
- 6.59. As previously established, the Proposed Development is the first Great Wolf Lodge proposed in the UK or Europe (with existing lodges only in North America presently). It provides a unique offer being a self-contained indoor waterpark connected to a hotel with associated complimentary indoor activities targeted at young families (with children between 2 and 12) and conferencing facilities.
- 6.60. The offer, experience and target audience to all parts of the resort, including the conferencing facilities that typically relate to the wider resort offer, is different and generally complementary to that of other hotels and / or resorts and therefore there will be negligible to no impacts.
- 6.61. Moreover, and of perhaps most importance considering the policy requirements to assess the impact on town centres, is that very few resorts, resort hotels or conferencing facilities are located within designated town centres and there would therefore be no diversion of expenditure away from centres.

- 6.62. For the reasons set out above it is not considered appropriate or necessary to consider quantitative impacts on any centres. Having regard to paragraph 89 of the NPPF, it is concluded that the Proposed Development would not have a significant adverse impact on existing, committed and planned investment in any town centres, or on town centre vitality or viability.
- 6.63. Referring to experiential evidence from Great Wolf Resorts in the USA, hotel guests (differentiated from day pass visitors) are typically coming from beyond the immediate area and therefore trips to and expenditure in local centres, namely Bicester in this instance, will represent a net gain in income to the area and any expenditure outside of the Proposed Development would result in an improvement to the vitality and viability of these centres. More detail in this regard is set out in the Economic Statement, prepared by Volterra. Following this assessment, it is concluded that the proposals therefore accord with the NPPF and CLP1 Policy SLE2.

Summary

- 6.64. As stated, the Proposed Development comprises a new leisure family resort and hotel on an established leisure site. It is demonstrated that through the detailed offer of the scheme, the Application Site can be considered to be a sustainable location; that the proposal is appropriate in terms of meeting the tests of developing in the open countryside; and that it cannot be located in a town centre or on a well-connected edge or out of centre site. The Proposed Development delivers significant economic benefits and, importantly, delivers strategic goals established in the CLP1 in terms of actively promoting and supporting tourism in the district. As such, the Proposed Development is acceptable by virtue of being consistent with policy aspirations and requirements.

Landscape and Visual Impact

- 6.65. A central part of pre-application discussions with CDC has been to agree a series of viewpoint locations and test the proposed massing of the scheme in these views, with the intention of minimising visibility of the proposed built form either through controlling heights and massing or enhancing landscaping (or both). The Proposed Development in these views is set out in the LVIA which considers the sensitivity of

individual views to change and the level of change or visibility of the building in these views (both upon completion of the scheme and after 15 years).

- 6.66. As part of the LVIA (Chapter 13 of the ES), BMD has considered a series of viewpoint locations with the built form of the Proposed Development not being visible in the majority of these views. As set out in the LVIA, *“there are views into and across the Site from upper storey north-west and west facing windows at nearby properties of Vicarage Farm and Stableford House ... along with views from an existing PRow that crosses through the Site”*. Elsewhere, there are views of the Proposed Development where generally the sensitivity is low (being on bridges over the M4).
- 6.67. The LVIA concludes that there would be no effects on the character of the wider landscape once the Proposed Development is operational and that there would be ‘Long Term Minor Beneficial’ effects on site and ‘Long Term Negligible Adverse’ effects on the surrounding local landscape. These not being considered as significant in EIA terms. In terms of visual effects, the establishment of woodland elevated on mounding along the southern boundaries would reduce views of the Proposed Development from the adjacent properties of Vicarage Farm and Stableford House, resulting in ‘Long Term Minor to Moderate Adverse’ effects, which are considered to not be significant in EIA terms.
- 6.68. Considering this, the Proposed Development is considered to be acceptable against relevant parts of the NPPF (both in terms of design and the principle of developing on a site in this location) and the CLP1 (policies ESD13 and ESD15 in particular).

Design Approach (Scale, Height and Massing)

- 6.69. An important planning consideration is whether the Proposed Development is considered to be acceptable in terms of design, paying particular regard to the immediate surroundings, the local context and notably the setting which in this case includes nearby and adjacent buildings, the wider countryside context (albeit immediately adjacent to the M40) and designated heritage assets.
- 6.70. The design and layout approach of the Proposed Development is outlined in full in the submitted plans and drawings and DAS (prepared by EPR) and, critically, in the

Landscape Proposals (prepared by BMD). Detailed elevational drawings and Computer-Generated Images ('CGIs') have also been prepared and show the proposed detailing and materiality of the Proposed Development.

- 6.71. Recognising national and local policy requirements and guidance, the Proposed Development has been carefully designed to respond to the specific constraints and opportunities of the Site, deliver the quantum and mix of floorspace capable of creating the destination, respect the local character and context of its surroundings, and provide a viable scheme capable of delivering the significant benefits outlined.
- 6.72. The height and massing of the building (including the taller elements) has evolved considerably during pre-application discussions and now represents a smaller and better articulated massing, appropriate – both in principle and as a result of the high architectural quality employed. The built form of the building has been carefully and purposefully developed and responds to its position and a series of views from a range of directions (all shown in detail in the LVIA). The full rationale for the building design is provided in detail in the DAS, and fully accords with Development Plan policies, which seek to carefully control buildings and their impacts and ensure that the bulk, height, scale, massing, quality of materials and detailed design of buildings are appropriate to the character of the area and the setting and amenities of surrounding buildings and spaces.
- 6.73. In designing the Proposed Development, the architects (and landscape impact assessors) have undertaken a thorough approach to understanding the local character (in accordance with paragraph 127 of the NPPF and CLP1 policy ESD15), resulting in architecture that achieves a positive contribution to the immediate area, of course recognising that the Site is largely unseen by the public.
- 6.74. As set out, the detailed design and layout of the Proposed Development has evolved through close engagement with CDC who have fed back detailed comments during a series of pre-application meetings. In addition, the Proposed Development has had the benefit of technical input from OCC and other stakeholders. Questions raised by the above and other, aforementioned, stakeholders have helped shape the scheme

including the future operational and management plans submitted as part of this application

Heritage Considerations (Above and Below Ground)

- 6.75. Through consideration of the location of the building (both in terms of footprint and massing), the Proposed Development has been carefully designed to avoid potential harm to the significance of designated heritage assets (including their setting).
- 6.76. A full assessment of effects on key views (scoped with CDC), as well as on the historic environment, is included within the accompanying LVIA. In relation to above ground heritage assets the LVIA concludes that *“potential effects on the settings of six designated heritage assets have been assessed ... [and] ... no significant residual effects have been found”*.
- 6.77. In terms of Archaeology, Chapter 10 of the ES concludes that *“the potential for archaeological remains to survive within the Site ... is considered to be low for the prehistoric, Roman, Early Historic, medieval and post-medieval periods”*. As set out, an archaeological evaluation by trial trenching (coordinated with OCC) will be undertaken during the determination period to further understand the potential for archaeological remains to survive.
- 6.78. In light of this assessment, the Proposed Development is acceptable when considered against the NPPF (paragraphs 184 - 196). The design development process and rationale expressed for the format of the scheme is also in accordance with the requirements on CDC under the Planning (Listed Building and Conservation Areas) Act 1990 (as amended).

Transport and Accessibility

- 6.79. A Transport Assessment prepared by Motion accompanies this application and demonstrates the acceptability of the Proposed Development in respect of the level of vehicular activity, the likely impact on the local transport network (as well as proposed servicing and delivery arrangements) and the car and cycle parking provision. A Framework Travel Plan has also been prepared by Motion, setting out the

proposed strategies to encourage sustainable travel modes, including focusing on walking, cycling and using public transport (by way of the proposed new shuttle bus services for hotel guests, staff and local residents in particular). The Site, through the Proposed Development will be accessible.

- 6.80. Recognising that the Proposed Development will introduce a number of people to the Site and immediate area, it is particularly focused on increasing the number of those traveling by non-car modes. The TA clarifies that the Site is accessible by foot, cycle and by public transport. A new shared pedestrian footway and cycleway will be provided from the Site to Chesterton, connecting with existing footway provision (and wider cycle network) and a free shuttle bus services for guests and staff and local residents will be provided.
- 6.81. The TA also establishes that cycle parking is provided in excess of local parking standards and is provided for both staff and visitors. Moreover, car parking provision is appropriate to meet the needs of the development and includes acceptable disabled user spaces and, importantly, over 10% of spaces are provided with electric vehicle charging capabilities (with the wider site future proofed to increase this percentage).
- 6.82. All servicing and deliveries associated with the development will be accommodated within the on-site service area and a Framework Delivery and Servicing Management Plan has been developed to manage all servicing activity associated with the proposed resort.
- 6.83. Considering the impact of the Proposed Development on the wider road network, detailed pre-application discussions have been held with OCC and CDC and these have resulted in agreement on matters including expected trip generation, distribution and the assessment of day pass provision. Detailed junction capacity analysis demonstrates that the proposed site access junction from the A4095 will operate within capacity with negligible queuing or vehicle delay. Furthermore, the Proposed Development will not have a material effect on the operation on junctions on the local highway network.

- 6.84. A Framework Travel Plan has been developed in order to promote sustainable travel choices amongst staff and visitors to the Proposed Development.
- 6.85. From an EIA perspective, Chapter 6 of the ES concludes that during both the construction and operation phase, *“the Proposed Development would result in a negligible (not significant) residual effect on the highway network local to the Site”*. This includes cumulative development and also takes into account management of movements through a Construction Management Plan, Framework Travel Plan and Delivery and Servicing Management Plan (all to be secured by legal obligation).
- 6.86. The Proposed Development complies with the NPPF (chapter 9), CLP1 policies SLE4, ESD1 and ESD17 and saved Local Plan policies TR7 and C9.

Energy and Sustainability

- 6.87. The Proposed Development would represent an energy efficient and sustainable scheme which is fit for purpose for its lifetime. As such, a number of features are introduced to provide a high-performance development in terms of sustainability and energy consumption. Further detail is set out in the Energy and Sustainability Statement, prepared by Hoare Lea. In summary, these include
- Use of high performance energy efficient building fabric and building services to reduce carbon emissions and energy demand;
 - Utilisation of rainwater harvesting technology collecting rainwater into a tank embedded under the car;
 - Use of regenerative media filter technology to reduce water consumption in the water park and across the resort;
 - Installation of specialist leak detection equipment to monitor water usage and identify any inefficiencies associated with minor and major leaks across the system;
 - Installation of photovoltaic panels in the optimum location recognising other management, visual and safety constraints;

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- Operation of a 'holistic energy strategy' installing load sharing technologies across the development;
 - Installation of a water source heat pump (WSHP) system to capture low-grade heat from chilled water return contributing towards hot water generation and space heating and ventilation system heating requirements;
 - Use of reversible air source heat pumps (RASHPs) to meet the development's cooling demands;
 - Installation of an air source heat pump (ASHP) to act as the lead heat source for the waterpark; and
 - Active recycling strategy to reduce waste and encourage reuse and recycling of material.
- 6.88. As required by CLP1 Policies, the Proposed Development will follow the energy hierarchy, to secure a reduction in regulated CO2 emissions. The Proposed Development provides a 12-14% reduction in carbon emissions compared to the Part L 2013 baseline and 39-45% reduction compared to (more realistic) SAP10 carbon emissions factors. This exceeds the levels of reductions secured as part of other consented schemes across Cherwell and represents an overall much more sustainable strategy.
- 6.89. In line with policy requirements, the Proposed Development is on target, through the identified sustainability 'features', to achieve (and exceed) BREEAM 'Very Good' standard, as is required. A BREEAM pre-assessment has been undertaken as part of the planning application and is included as an appendix to the Energy & Sustainability Statement.
- 6.90. In summary, the Proposed Development complies with the NPPF (Chapters 9 and 15 in particular) CLP1 policies ESD1 to ESD8.

Flood Risk and Drainage

- 6.91. As established elsewhere in this Planning Statement, the Site is located in Flood Zone 1 and as such it is at a low risk of surface water flooding (with a probability of less than 0.1% every year). On this basis, and given the uses proposed, the Proposed Development is fully compliant with the policy requirements and guidance on the sequential test and the principles of the NPPF.
- 6.92. The Drainage and SuDS Strategy prepared by Curtins demonstrates that the existing land drainage system (serving this section of the golf course) is performing poorly and that the Proposed Development looks to reinstate where possible and upgrade this system. Surface water runoff rates from the Proposed Development are proposed to reduce by considerably compared to the existing scenario. The Drainage and SuDS Strategy has been designed to cater for the 1 in 100 year storm event + 40% climate change allowance, in accordance with best practice and the NPPF.
- 6.93. Excess surface water flows are proposed to be attenuated using permeable pavements, detention basins, swales and a below ground attenuation tank (that will facilitate a rainwater harvesting system as part of the Proposed Development). In addition, it is proposed to use green roofs, permeable pavements and swales as part of an on-site collection system.
- 6.94. A separate foul water system is to be developed as part of the project. As there is no viable outfall in the immediate vicinity, this will outfall to an adoptable pumping station and be pumped via rising main to the nearest Thames Water manhole. The peak discharge rate is estimated to be 50l/s.
- 6.95. The Proposed Development complies with the NPPF, CLP1 policies ESD6 and ESD7 and relevant national, regional and local guidance in terms of flood risk and drainage.

Amenity Considerations

- 6.96. The Proposed Development has been assessed in terms of its potential impact on the amenity of nearby residents, in accordance with specific technical requirements, in

terms of both the construction and operational phases. Overall, these studies demonstrate that the Proposed Development is acceptable in planning terms.

- 6.97. Considering noise and vibration impacts, the noise impact assessment feeding into the ES concludes that during the operational phase of the Proposed Development, the noise and vibration effects of associated road traffic, on-site activities and fixed plant on neighbouring residential properties are negligible (not significant). Of note is that the reduction in road traffic noise impacting BHGS, Vicarage Farm and Stableford House (as the closest receptors) will represent a negligible to permanent minor beneficial effect (not significant). During the construction phase, the effects are considered to be at worst temporary minor adverse (not significant), and will only be at this level during a short (less than 1 month) period during some landscaping works closest to these properties. Proposed landscaping works, bunding and solid fencing is incorporated to minimise impacts and site management (during both the construction and operational phases) will also assist in controlling noise impacts on these nearby receptors.
- 6.98. A detailed lighting design strategy has been prepared by Hoare Lea responding to the wider context, the Applicant's specific operational and safety requirements and considering the potential impacts in terms of light pollution – light glare, light trespass / encroachment and sky glow (as well as energy efficiency). Different lighting design approaches are taken to the specific parts of the Proposed Development. An assessment of the impacts finds that there will be minimal light spill beyond the boundary of the Application Site boundary.
- 6.99. An assessment of local air quality conditions has been prepared by Hoare Lee and is within the Air Quality Assessment included as an appendix to the ES. This considers the likely effects of the Proposed Development on air quality during the construction and operational phases demonstrating that emissions are minimised and that the impacts of the Proposed Development are not significant, satisfying the requirements of the NPPF (paragraph 181), the CLP1 and other referenced planning guidance.

Biodiversity and Ecology

- 6.100. Chapter 9 of the ES considers the impact of the Proposed Development on biodiversity. The Applicant has engaged with CDC through pre-application discussions through which the scope and nature of assessment has been agreed. As set out in Chapter 9 of the ES, an ecological baseline status (namely the existing scenario in terms of biodiversity and ecological habit) has been established through a mix of desk based studies and field surveys. This has included the following: on and off-site habitats of conservation importance; Bats; Badger; Other mammals; Birds; Reptiles; Amphibians; and Invertebrates.
- 6.101. The approach taken by the Applicant and ecologists, WSP, has been to retain existing habitats (where of value worthy of retention) and where removal is considered necessary for the Proposed Development to re-provide both an enhancement in terms of quantum and quality. This has been achieved across the Site and is demonstrated in the positive biodiversity net gain assessment.
- 6.102. As part of the ecological work feeding into the ES, the Applicant is proposing a Habitat Maintenance and Management Plan (and Landscape Maintenance and Management Plan) that will be secured by way of planning condition and / or obligation. In addition, the Applicant proposes a series of 'wildlife installations', including hibernacula for reptiles and amphibians; brush piles for reptiles and invertebrates; swift nest boxes; house martin nest boxes; sparrow terraces; bird and bat boxes and sandy scrapes for invertebrates. The comprehensive package of commitments from the Applicant and the demonstrable positive Biodiversity Net Gain calculation are representative of the overall ecological benefits of the Proposed Development, when operational, concluded to be negligible to permanent beneficial in the ES (Chapter 9)
- 6.103. Considering the summary points above and the detail in the ES, the Proposed Development is acceptable in accordance with the NPPF (paragraphs 170 and 174 in particular), Policy ESD10 of the CLP1, saved policies C2 and C4 of the 1996 Local Plan and relevant current guidance and legislation.

Other Relevant Planning Considerations

6.104. The following other matters have been assessed as part of the Proposed Development and the below statements summarise the key findings from these documents.

Trees

6.105. An Arboricultural Impact Assessment, prepared by WSP, sets out that there are 220 arboricultural 'features' on the site of which 15 are of moderate quality, 204 of low quality and 1 which is very low quality. The Proposed Development would result in the removal of 91 'features' (11 of moderate quality and 80 low quality – of which 6 of the low quality tree groups will only be partially removed).

6.106. Importantly, the Proposed Development does not adversely impact any TPO covered tree groups and would involve considerable tree planting and wider soft landscaping enhancements across the Site. As such, the Proposed Development complies with relevant parts of the NPPF and CLP1.

Waste and Servicing

6.107. A Framework Delivery and Servicing, prepared by Motion, and submitted with this application sets out the servicing and waste collection strategy which has been developed in consultation with WSP (who have prepared a detailed Waste Management Strategy, also submitted with this application). The Proposed Development will be serviced on site with all deliveries and refuse collection activities being carried out at a dedicated servicing area to the side of the main building. The strategy seeks to manage deliveries and servicing to, from and within the premises in order to ensure that servicing activity is undertaken successfully and without conflict between vehicles and/or pedestrians (hotel guests and staff and members of the public).

6.108. It is established that the proposed strategies meet the requirements of relevant waste policy and guidance, as well as well as overarching sustainability and waste minimisation guidance and principles.

6.109. The accompanying planning documentation, including the ES, provides a detailed assessment of the Proposed Development considering additional planning matters to those set out in the above summary. The conclusions reached in these documents form part of the wider policy assessment of the Proposed Development

6.110. As established in this Section and set out in detail in the comprehensive material submitted in support of this planning application (including this Planning Statement), the Proposed Development accords with the Development Plan when read as a whole. Accordingly, it benefits from the statutory presumption set out in section 38(6) of the 2004 Act.

7. PLANNING OBLIGATIONS & SECTION 106

- 7.1. In accordance with Section 106 of the Town and Country Planning Act 1990 (as amended), the Applicant will enter into a Section 106 legal agreement with CDC and OCC to deliver the agreed package of mitigation measures. Such obligations will need to comply with Regulation 122 of the Community Infrastructure Levy Regulations 2010 as amended, which requires the obligation, to be (a) necessary to make the Proposed Development acceptable in planning terms; (b) directly related to the Proposed Development; and (c) fairly and reasonably related in scale and kind.
- 7.2. At this stage the precise detail of the obligations has not been determined although these would include the below obligations which are included as draft Heads of Terms at this stage. The below list reflects pre-application discussions with CDC and OCC officers and covers items picked up in the CDC Developer Contributions SPD (dated February 2018).
- Providing public use of the nature trails area to the north east of the site for 7-day a week access, during daylight hours (and including maintenance of this area);
 - Resourcing and operating a free-to-use shuttle bus service between Chesterton and Bicester for use by hotel guests and staff and the public;
 - In accordance with terms set out in the OMP and TA, making available day passes with discounts for local residents (those within OX5, 15, 16, 17, 25, 26 and 27 postcodes – Banbury, Bicester and Kidlington);
 - Allowing access for locally identified charities (specifically those that are family focussed) to the Proposed Development;
 - Working with local schools, to provide spaces on site (within the nature trails area) to run a Local Ecology Project;
 - Resourcing a diversion of and enhanced Public Right of Way through a new section of landscaping, representing a more accessible and useable route, and connecting into the existing wider network of routes;
 - Delivering a new accessible shared footway and cycleway between Chesterton village and the Site, and extending further west along the A4095 (Section 278 works);

- Delivering A4095 improvement works, comprising a new right turn lane junction serving the Proposed Development (Section 278 works);
- Provision of a minimum of 150 local construction apprenticeships or apprenticeship starts as part of a wider Employment, Skills and Training Plan – and progressing discussions with local construction apprenticeships facilitator, Ace Training;
- Provision of local recruitment initiatives during the operational phase in accordance with CDC advice and working with developing contacts in specialist-course departments at UK Universities and Colleges;
- Ongoing management of vehicle activity through an active Travel Plan prioritising, promoting and monitoring sustainable travel to the site by non-private car modes;
- Delivery of a coordinated off-site signage strategy to direct guests and staff to the proposed resort (Section 278 works);
- Managing the construction process through a detailed Construction Management Plan, protecting local amenity throughout the construction process;
- Ensuring that delivery and servicing activity is managed through a final Delivery and Servicing Management Plan;
- Installation of electric vehicle charging infrastructure in accordance with the proposals; and
- Delivering long term landscape and ecological management through Landscape Management and Maintenance Plan and Ecological (Habitat) Management and Maintenance Plan.

7.3. The above list of obligations will be discussed further with CDC and OCC ultimately being secured through Section 106 legal agreement.

8. CONCLUSIONS

- 8.1. Great Wolf Resorts' mission is to offer families a dynamic and unrivalled entertainment experience, with each moment designed for maximum fun. Great Wolf Resorts have grown to become North America's largest operator of waterpark resorts, and are an icon in the hospitality industry by offering everything under one roof – waterpark, hotel, restaurants, adventure games, attractions, family bonding experiences, arcade games, retail and more. The focus of each Great Wolf Lodge is on families, being designed for children ages 2 to 12 (and their parents, guardians, carers and grandparents).
- 8.2. The Proposed Development involves the development of part of an existing golf course delivering an exciting new indoor leisure resort comprising a 498-bedroom hotel, waterpark, restaurants, adventure games, attractions, family bonding experiences, arcades, retail and more. The Proposed Development will provide extensive landscaping works, enhancing the existing landscaped context, and including a new circa 6 ha nature trail for public use.
- 8.3. The Proposed Development optimises the Site's use and delivers an appropriate use in a sustainable location. Planning policy supports the principle of tourist development that would encourage visitors to the area. The Proposed Development achieves this.
- 8.4. The planning application is supported by a comprehensive suite of technical reports, demonstrating that the Proposed Development is consistent with policy across a wide range of disciplines including but not limited to design, visual impact, transportation, residential amenity, air quality and sustainability.
- 8.5. The Proposed Development has been brought forward following close engagement with CDC and OCC officers and other key stakeholders including the local community. This engagement has informed the Proposed Development.
- 8.6. The Proposed Development represents a significant opportunity to deliver the following important economic, social and environmental public and placemaking benefits:

- Significant direct **investment** in Cherwell of £200m, reinforcing its position as an open and growing district and acting as a **positive catalyst for future investment** and development, particularly in the tourist sector.
- Provision of an exciting **new family leisure resort, waterpark and hotel** designed for young families, complementing the existing offer in the area.
- Provision of **discounted day passes**, designed to support local families in the wider Bicester area.
- Delivery of a **high-quality development** including investment of over £1m in **new tree planting and landscaping**.
- Delivery of new **local employment opportunities**, with up to 600 permanent Great Wolf Lodge jobs (460 FTEs) created with further jobs created during the construction and fit out period.
- **Supporting local young people** with 42% of jobs targeted at those under the age of 21 offering **full lifeguard and hospitality training**
- Creation of significant **additional local spin-off jobs and wider economic benefits** created through demand for local goods and services in the area associated with increased visitor numbers and £4.9m of additional spend per year to the area.
- Commitment to working alongside and **supporting local and national charities** through partnerships, employment and apprenticeship opportunities and community events.
- Delivery of a **sustainable development**, incorporating sustainable design techniques and encouraging sustainable modes of travel, particularly for staff.
- Creation of a substantial new **public nature trail**, expressly for local residents', workers' and visitors' benefit.
- Delivery of a **new pedestrian footpath** from the resort into Chesterton village, aiding accessibility in the immediate area.
- Provision of **free-to-use shuttle bus services** for resort visitors, staff and Chesterton residents.
- **Protecting and enhancing local biodiversity** through extensive greening and ecological works.
- Generation of **substantial business rates contributions**, for local and regional benefit.
- Securing a **viable future for the BHGS golf club** and its members.

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- 8.7. For the reasons set out in the comprehensive material which is submitted in support of this planning application (including this Planning Statement), the Proposed Development accords with the Development Plan when read as a whole. Accordingly, it benefits from the statutory presumption set out in section 38(6) of the 2004 Act.
- 8.8. Moreover, the application material also demonstrates that the Proposed Development comprises sustainable development within the meaning of the NPPF, such that it engages the presumption set out in paragraph 11. This reinforces the policy support for the Proposed Development. The application also demonstrates that there are a number of material considerations which indicate that the planning application should be granted. It follows that, upon any application of section 38(6) of the 2004 Act, planning permission should be granted for the Proposed Development.

APPENDIX 1

PLANNING POLICY FRAMEWORK

This Appendix acts as an extension to Section 6 of this Planning Statement and provides further detail behind the policy assessment. It sets out the existing planning policy framework and provides an audit of relevant parts of the National Planning Policy Framework (NPPF) and the Development Plan (the 2015 Cherwell Local Plan Part 1 and saved policies of the 1996 Local Plan).

As presented in Section 6 of this Planning Statement, all policies have been addressed and accorded with, demonstrating the acceptability of the Proposed Development.

NPPF

The NPPF was published in February 2019 and sets out the Government's objectives for achieving sustainable development. The NPPF establishes a presumption in favour of sustainable development. Paragraph 8 confirms there are three dimensions to sustainable development: economic, social and environmental.

When making planning decisions, paragraph 11 of the NPPF confirms that there should be a presumption in favour of sustainable development and that planning permission should be granted where development proposals accord with the Development Plan. This approach is applied in the assessment of the Proposed Development.

The NPPF then outlines a series of considerations against which development should be assessed. In terms of the Proposed Development the relevant considerations are:

- Chapter 2 – Achieving sustainable development;
- Chapter 4 – Decision-making;
- Chapter 6 – Building a strong, competitive economy;
- Chapter 7 – Ensuring the vitality of town centres;
- Chapter 8 – Promoting healthy and safe communities;
- Chapter 9 – Promoting sustainable transport;
- Chapter 11 – Making effective use of land;
- Chapter 12 – Achieving well-designed places;
- Chapter 14 – Meeting the challenge of climate change, flooding and coastal change;
- Chapter 15 – Conserving and enhancing the natural environment; and
- Chapter 16 – Conserving and enhancing the historic environment.

Paragraph 8, states that the planning system has three overarching objectives that must be pursued in mutually supportive ways: economic, social and environmental.

The NPPF encourages Local Planning Authorities (LPAs) to take an active role in guiding development towards sustainable solutions (Paragraph 9) and should apply a presumption in favour of sustainable development, approving applications that accord to an up-to-date Development Plan within delay (Paragraph 11).

Chapter 4 states that LPAs approach decisions on applications in a creative and positive way stating that they should work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of an area (Paragraph 38). The Planning Statement and accompanying application documents demonstrate the wide range of benefits achieved through the Proposed Development.

Paragraphs 39 to 42 emphasises the importance of pre-application engagement, making the point that it *“has significant potential to improve the efficiency and effectiveness of the planning application system for all parties”* and that it *“... enables better coordination between public and private resources and improved outcomes for the community”*. The level of engagement with Cherwell District Council (CDC), Oxfordshire County Council (OCC), other statutory stakeholders and the local community has been substantial and this has been beneficial to the progression and evolution of the Proposed Development.

Paragraph 43 stresses the importance of having *“the right information”* and that the applicant should discuss (and agree) what is required as part of an application. Paragraph 44 adds that *“voluntary planning performance agreements”* should be considered. The Applicant has been through a thorough pre-application process with CDC (in particular) to agree to the scope of the application. This has been done through a planning performance agreement between the Applicant, CDC and OCC.

Paragraph 54 is clear that LPAs *“should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations”*. The Proposed Development should be processed with this in mind, particularly the role that planning conditions and / or obligations can have on managing the activity associated with the proposed resort.

Within Chapter 6, specifically at Paragraph 80 of the NPPF, the Government’s commitment to supporting economic growth and productivity is identified. Specifically, it is highlighted that, *“significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development”* (paragraph 80). The

Proposed Development looks to create a number of new jobs directly (as part of the resort –in the hotel, waterpark and associated other components, as well as the management of the proposed building and wider site). In addition, further jobs will be created during the construction and fit out stages. The proposed uses will have significant further positive effects in the local economy linked to new resort visitor spending.

Paragraph 83 considers the rural economy, noting that policies and decisions *“should enable ... sustainable rural tourism and leisure developments which respect the character of the countryside”*. Paragraph 84 adds that, *“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”*. The Proposed Development seeks to deliver an important tourist attraction in a rural setting (albeit not in a protected area) on an established leisure site. It seeks to improve access by pedestrians and cyclists and through a new shuttle bus service offers an opportunity to use this and connect to the wider public transport network – that currently does not serve Chesterton well.

Paragraph 86 directs main town centre uses (including hotel and leisure uses – referring to Annex 2 glossary of terms) to defined town centres or well-connected edge and out of centre locations. The Site is classed as being in an Out of Centre location and as such a sequential test should be applied (paragraph 86). As per paragraph 87, *“preference should be given to accessible [edge and out of centre] sites which are well connected to the town centre”*. Considering paragraph 89 an impact assessment is required, to consider the impact of the proposals on *“existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal”* and *“the impact of the proposal on town centre vitality and viability, including local consumer choice and trade”*. These requirements are considered within Section 7 of this Planning Statement.

Paragraph 91 states that planning decisions should promote social interaction, be safe and accessible, and enable and support healthy lifestyles. The Proposed Development meets these objectives.

Considering paragraph 92, planning decisions should be supportive of *“the provision and use of shared spaces, community facilities ... and other local services to enhance the sustainability of communities and residential environments”*. In addition, they should *“guard against the unnecessary loss of valued*

facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs" and "ensure that established shops, facilities and services are able to develop and modernise, and are retained for the benefit of the community". The Proposed Development provides a new leisure offering to the local and wider population, particularly young families, repurposing an existing leisure use which would remain operational.

Paragraph 95 (a) states that planning decisions should promote public safety and take into account wider security and defence requirements. The Proposed Development has been assessed by security specialists who have fed into the design of the scheme to mitigate against a range of risks.

Paragraph 96 acknowledges that, *"access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities"*, adding that *"policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision"*. The Proposed Development, which looks to develop part of an existing golf course (with the remainder being repurposed) for a further leisure use assess the CDC evidence base and provides a contemporaneous quantitative and qualitative review of needs.

Paragraph 97 establishes that open space, sports and recreational buildings and land should only be built on where at least 1 of 3 criteria are met: *"an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or the loss resulting from the Proposed Development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable; or the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use"*. This Planning Statement assesses the appropriateness of the Proposed Development against these criteria.

Paragraph 98 states that *"decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails"*. The Proposed Development seeks to enhance an existing under-utilised Public Right of Way as part of a diversion through a landscaped walkway and plugging into and extending a wider footpath network into Chesterton.

Paragraph 103 states that, *"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 ... [recognising that] ... opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and [that] this should be taken into account in ... decision-making"*. The Application Site is not in the most sustainable location in the district (using CDC terminology) but

the Proposed Development looks to encourage sustainable travel, including by foot and bicycle, and using a free shuttle bus service connecting into nearby Bicester's excellent public transport provision.

Paragraph 108 (b) requires that *"safe and suitable access ... can be achieved for all users"*. This is achieved through the scheme layout, informed by pre-application engagement and expert input. Paragraph 109 is clear 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"*. The Proposed Development does not lead to unacceptable or severe impact(s).

Paragraph 110 states that proposals should: Give first priority to pedestrian and cycle movements; Address the needs of people with disabilities or reduced mobilities; Create places that are safe, secure and attractive; Allow for the efficient delivery of goods, and access for emergency services; Be designed to enable charging of electrical or other low emission vehicles. All of these criteria are met being discussed further in the supporting Transport Assessment.

Paragraph 111 states that all developments that will generate significant amounts of movement should provide a travel plan, and this is being submitted as part of the planning application.

Chapter 11 states the importance of the making effective use of land. Paragraph 118 is clear that decision makers should *"encourage multiple benefits from both urban and rural land"*; *"taking opportunities to achieve net environmental gains – such as developments that would enable new habitat creation or improve public access to the countryside"*; and *"promote and support the development of under-utilised land and buildings"*. The Proposed Development delivers these key policy objectives.

Paragraph 120 states that decisions *"need to reflect changes in the demand for land ... [and] ... be informed by regular reviews of both the land allocated for development in plans, and of land availability"*. The Proposed Development uses an established leisure site that provides limited public value, responding to local needs for leisure activities and hotel accommodation.

Paragraph 121 states that LPAs should take a positive approach to applications for alternative uses of land which is currently developed but not allocated for a specific purpose in plans, where this would help to meet identified development needs. The Proposed Development would utilise established leisure land delivering an appropriate use which would offer greater public use, including access to public open space.

Paragraph 122 emphasises the importance of supporting proposals that make efficient use of land, reflected in appropriate densities, taking into account design, character and sustainability factors. The Proposed Development is considered represents an efficient use of the site, at an appropriate density considering its context and the *“prevailing character and setting”* of the area.

Chapter 12 states that creation of well-designed places and high-quality design is a fundamental part of the planning and development process (Paragraph 124) and that proposals should ensure they are (Paragraph 127): visually attractive; function well; sympathetic to local area; have a strong sense of place; optimise potential of site; and create safe, inclusive, and accessible space. The Proposed Development has been designed by award winning architects EPR who have given extensive consideration to the development to ensure it combines functional, contextual and high quality design. Returning to pre-application engagement, the scheme has been borne out of extensive discussions with CDC, and other stakeholders including local residents, and as per paragraph 128, *“applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot”*.

Paragraph 131 states that great weight should be given to outstanding or innovative designs which promote high levels of sustainability, raise the standard of design in the area, and fit in with the form and layout of the surroundings. The DAS and accompanying documents provide extensive detail around the high-quality design and positive sustainability outcomes.

Paragraph 150 states that *“new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change”* (including flooding). The Proposed Development is in a low risk flood area but in any event, is designed to mitigate against and reduce the risk of flooding.

Paragraph 153 establishes the need for new development to be sustainable in terms of its design and operation, stating that proposals should *“take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption”*.

Paragraphs 157 to 162 set out the Sequential Test approach to development in areas at risk of flooding – noting the application Site is not in an ‘at risk’ area. Paragraph 160 states that *“a site-specific flood risk assessment ... must demonstrate that the development will be safe for its lifetime...”* and that, *“local planning authorities should ensure flood risk is not increased elsewhere”* (Paragraph 163). A Flood Risk Assessment is submitted with this application (and supports the acceptability of the Proposed Development).

Paragraph 165 states that major development schemes, *“should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate”*. The Proposed Development incorporates SuDS.

Chapter 15 details the approach to conserving and enhancing the natural environment. Paragraph 170 adds that decisions should recognise *“the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland”*. The Proposed Development maintains and invests heavily in new landscaped areas, as part of the landscape-first approach and careful consideration to the setting of the scheme.

Paragraph 174 looks to *“promote the conservation, restoration and enhancement of priority habitats, ecological networks...”* and *“conserve and enhance biodiversity”* (paragraph 175). The Proposed Development proposes appropriate mitigation and habitat provision, and secures a biodiversity net gain across the site.

Paragraph 180 states that planning decisions should ensure that *“new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment”*. In a similar vein, it is important that planning decisions *“avoid noise giving rise to significant adverse impacts on health and quality of life”* (Paragraph 180). The principles are appropriately dealt with through the planning application.

Paragraph 181 requires that *“planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan.”*. The planning application carefully considers air quality implications and impacts, specifically, in the accompanying Air Quality Assessment (forming part of the ES), prepared by Hoare Lee.

Chapter 16 details the approach to conserving and enhancing the historic environment. The application has acknowledged the proximity to Conservation Areas and Listed Buildings, and the Environmental Statement undertakes a detailed review of the scheme in light of the setting of these heritage assets. Paragraph 189 states that applications should provide a description of the significance of an asset and the contribution it makes to setting. Paragraph 190 states that *“Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset)”*. Townscape and heritage considerations have been central in the evolution of this scheme and, in particular, the potential impact on nearby designated heritage assets, and wider views. It is demonstrated, through this application, that no harm is caused by the Proposed Development.

Notwithstanding the above, the Proposed Development delivers substantial public benefits, as set out in Section 1 of this Planning Statement, that is considered to significantly outweigh any degree of harm that could be caused.

Cherwell Local Plan Part 1 (2015)

The following adopted CLP1 policies are of relevance to the Site and Proposed Development.

- Policy PSD1 establishes that CDC *“will always work proactively with applicants to jointly find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area”*. The Proposed Development delivers clear benefits on the back of carefully assessed impacts on such local conditions.
- Policy SLE2 directs ‘main town centre uses’ to the defined centres of Banbury, Bicester and Kiddlington and is consistent with the NPPF in terms of the application of the sequential and impact tests. The Proposed Development is considered against these tests in this Planning Statement, concluding that the proposals are acceptable in planning terms.
- Policy SLE3 identifies that CDC *“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”*. The Proposed Development represents an important new tourist facility and through this Planning Statement it is concluded that the site can be made sustainable in terms of the national and local definition of such a location.
- Policy SLE4 establishes that, *“new development in the District will be required to provide financial and/or in-kind contributions to mitigate the transport impacts of development”* adding that development *“should facilitate the use of sustainable modes of transport to make the fullest possible use of public transport, walking and cycling”*. The policy also states that *“development which is not suitable for the roads that serve the development and which have a severe traffic impact will not be supported”*. The Proposed Development, whilst being a largely car-borne destination, actively promotes sustainable travel and invests in local shuttle bus services as part of the proposals.
- Policy BSC10 looks to *“ensure that sufficient quantity and quality of, and convenient access to open space, sport and recreation provision is secured”*, going on to state that existing sites will be protected and that existing deficiencies will be addressed. An assessment of the existing need for the current golf use (noting that 9-holes remain) has been undertaken and it is

concluded that the space can be changed. Critically, the proposed new nature trail and leisure resort offering significantly enhance the quality and quantity of space for users.

- Policy ESD1 looks to mitigate the impact of development in terms of the climate change agenda through; *“distributing growth to the most sustainable locations”*; promoting development that reduces the need to travel and promotes *“sustainable travel options including walking, cycling and public transport”*; designing development *“to reduce carbon emissions and use resources more efficiently, including water”*; and promoting more sustainable forms of energy. The site is considered to satisfy the requirement for being in a sustainable location and, moreover, the scheme incorporates a number of sustainability features to align with the policy requirements.
- Policy ESD2 reinforces national policy in terms of promoting an ‘energy hierarchy’ which looks to reduce energy use and use renewable energy. The requirements of the hierarchy are adhered to.
- Policy ESD3 states that *“all new non-residential development will be expected to meet at least BREEAM ‘Very Good’ ... [and that] ... the demonstration of the achievement of this standard should be set out in the Energy Statement”*. Sustainable construction methods including the minimisation of energy demands and loss; resource efficiency; selection of materials; and reducing waste will be encouraged. The Proposed Development is designed to achieve BREEAM Very Good standards.
- Policy ESD4 sets out that decentralised energy systems will be encouraged with a feasibility study required for major schemes of over 1,000 sqm. The application is accompanied by a detailed Energy & Sustainability Statement which provides an assessment against this policy.
- Policy ESD5 supports renewable and low carbon energy and encourages major schemes (over 1,000 sqm) to incorporate this where deliverable and viable. The application is accompanied by a detailed Energy & Sustainability Statement which provides an assessment against this policy.
- Policy ESD6 identifies the overarching goal to *“manage and reduce flood risk”*. In terms of Proposed Developments, it is stated that *“building over or culverting of watercourses should be avoided and the removal of existing culverts will be encouraged”*. Surface water discharge will need to accommodate storm events and will need to ensure that flood risk elsewhere is not increased. A FRA is submitted with the application as is a Drainage & SuDS Strategy showing the technical drainage proposals, representing an enhancement, and compliance with this policy.
- Policy ESD7 is clear that, *“all development will be required to use sustainable drainage systems (SuDS) for the management of surface water run-off”*. A FRA is submitted with the application as is a Drainage & SuDS Strategy showing the technical drainage proposals, representing an enhancement, and compliance with this policy.

- Policy ESD8 states that CDC *“will seek to maintain water quality, ensure adequate water resources and promote sustainability in water use”* and dictates that *“development will only be permitted where adequate water resources exist, or can be provided without detriment to existing uses”*. The Proposed Development, whilst incorporating a water park, uses tried and tested specialist equipment to ensure water use is efficiently managed. In addition, rainwater and greywater is harvested, where possible.
- Policy ESD10 looks to deliver the *“protection and enhancement of biodiversity and the natural environment”*, requiring developments to secure a biodiversity net gain; protecting and increasing tree numbers; and protecting existing habitats in accordance with surveys and guidance. The Proposed Development invests heavily in extensively enhancing the existing landscaped context on the site, resulting in a biodiversity net gain and the creation of and extension of habitats across the site.
- Policy ESD13 promotes *“the enhancement of the character and appearance of the landscape, particularly in urban fringe locations, through the restoration, management or enhancement of existing landscapes, features or habitats and where appropriate the creation of new ones, including the planting of woodlands, trees and hedgerows”*. The policy adds that new development *“will be expected to respect and enhance local landscape character, securing appropriate mitigation where damage to local landscape character cannot be avoided ... [and that] ... proposals will not be permitted if they would: Cause undue visual intrusion into the open countryside; Cause undue harm to important natural landscape features and topography; Be inconsistent with local character; Impact on areas judged to have a high level of tranquility; Harm the setting of settlements, buildings, structures or other landmark features; or Harm the historic value of the landscape”*. The impact of the Proposed Development on the local landscape is carefully assessed and considered in terms of the ES (within the LVIA).
- Policy ESD15 expects proposals to show *“an understanding and respect for an area’s unique built, natural and cultural context ... [and to] ... complement and enhance the character of its context through sensitive siting, layout and high quality design”*. The policy goes on to set out a series of design requirements. The Applicant and project architects have carefully designed the scheme to respond to the needs of the development and the local context – with both informing the scheme. A lengthy pre-application design progress has been undertaken to refine the design.
- Policy ESD17 states that *“proposals should maximise the opportunity to maintain and extend green infrastructure links to form a multi-functional network of open space, providing opportunities for walking and cycling, and connecting the towns to the urban fringe and the*

wider countryside beyond". As part of the Proposed Development an under-utilised stretch of Public Right of Way is redirected and taken through a landscaped route before picking up with the existing wider network. The proposals also include a new stretch of fully accessible footway from the site to Chesterton village and proposes an extensive nature trail area, for public use.

Cherwell Local Plan (1996)

The following saved Local Plan policies are of relevance to the Site and Proposed Development.

- Policy TR7 states that, *"development that would regularly attract large commercial vehicles or large numbers of cars onto unsuitable minor roads will not normally be permitted"* with supporting text adding that such developments are *"expected to have good access to the major through routes or County inter-town routes ... or other principal roads"*. It is acknowledged that the Proposed Development will attract new vehicles onto the road network. Careful assessment of the impacts has been undertaken including a review of the role and capacity on the local network.
- Policy T5 dictates that, *"beyond the built-up limits of a settlement the provision of new hotels, motels, guest houses and restaurants will generally only be approved when such proposals would ... replace an existing commercial use on an existing acceptably located commercial site"*. The site is in an existing leisure use, forming 9-holes of the wider BHGS hotel, golf and spa. These 9-holes are replaced, adding activity and utilisation to an existing commercial use.
- Policy C2 protects against development that would adversely affect protected species. A detailed review of existing species across the site has been undertaken and proposed mitigation / rehoming strategies established in the supporting material.
- Policy C4 is clear that, *"the council will seek to promote the creation of new habitats ... [and] ... promote the interests of nature conservation within the context of new development and will establish or assist with the establishment of ecological and nature conservation areas, where such areas would further the opportunity for environmental education and passive recreation and would not conflict with other policies in the plan"*. As stated, the Proposed Development delivers a biodiversity net gain, on the back of a thorough assessment of existing habitats and species on site.
- Policy C7 sets out that, *"development will not normally be permitted if it would cause demonstrable harm to the topography and character of the landscape"* with the supporting text adding that development should *"not detract from important views"*. Important viewpoint

locations have been agreed with CDC as part of pre-application discussions and the Proposed Development is robustly assessed in terms of impacts in these important local views.

- Policy C9 states that, “...development of a type, size or scale that is incompatible with a rural location will normally be resisted”. The Proposed Development is considered to be appropriate in this location on account of the detailed assessment of the physical visible impact that the scale of development has (see LVIA) and the resultant impacts of the proposed activity, for example the increase in traffic associated (see Transport Assessment in particular).
- Policy C15 is clear that, “the council will prevent the coalescence of settlements by resisting development in areas of open land, which are important in distinguishing them”. The prevention of the coalescence of Chesterton and Bicester is noted as a policy requirement. The Proposed Development, being to the west of Chesterton (and against the M40) in no way impacts upon the existing buffer between the two settlements – to the east of Chesterton and west of Bicester.

APPENDIX 2

DESK BASED GOLF NEEDS STUDY

DESK BASED GOLF NEEDS STUDY

In respect of

**Land to the East of the M40 and South of the A4095, Chesterton,
Bicester, Oxfordshire**

On behalf of

Great Lakes UK Ltd

07th November 2019

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PART I

INTRODUCTION

INTRODUCTION



INTRODUCTION

Background

Great Wolf Lodge, which is owned, managed and developed by Great Wolf Resorts, is a leading brand of family resorts in the U.S that promotes a fully integrated experience anchored by an indoor waterpark.

The centrepiece attraction at every Great Wolf Lodge is the indoor waterpark that includes a variety of pools and slides for every member of the family. Resorts include a family entertainment centre with attractions such as a ropes course, climbing wall, miniature golf, family bowling, arcade games and MagiQuest – Great Wolf Lodge’s own brand-exclusive mystical adventure game.

Source: Great Wolf Resorts Website

Proposal

The current site is home to part of the Bicester Hotel, Golf & Spa. The proposal will be to redevelop nine holes of the existing 18-hole golf course. The proposed Great Wolf Lodge would sit on a circa 18.6-hectare (46 acres) plot alongside the existing Bicester Hotel, Golf & Spa (which will remain on site), creating a complementary offer.

Bicester Hotel, Golf & Spa will remain operational and continue under the same ownership and management as at present. These proposals would also allow for improvement in the remaining nine holes, with the intention of better meeting demand.

Development

The new indoor waterpark and indoor adventure park will include:

- **Hotel:** A 498 room hotel with themed rooms.
- **Waterpark:** The centrepiece attraction at every Great Wolf Lodge is the indoor waterpark that includes a variety of pools.
- **Family Entertainment Centre:** Includes indoor attractions such as a ropes course, climbing wall, family bowling, arcade games and an interactive ‘mystical quest’ game.
- **Conference Facilities:** Flexible conference facilities with natural light and access to an outdoor terrace.
- **Dining Options:** Great Wolf Lodge offers a range of dining experiences from a high-quality table service restaurant, to small, branded food and beverage outlets.
- **Public Nature Trail:** Publicly accessible natural trail with picnic spaces and information boards, designed for public use as well as hotel guests and day visitors.

INTRODUCTION

Site

Current Site Plan



Proposed Site Layout Plan



Scope

As the proposals for the resort development would result in the loss of 9 holes of the existing 18-hole golf course, Cherwell District Council requires that the loss of golf course provisions is justified against existing planning policy (Namely policy BSC10 of the local plan and paragraph 97 of the NPPF). As such this report seeks to justify the loss of part of the golf course. This report considers four key areas as part of this assessment

These are as follows:

1. Golf trends;
2. Local golf club provision;
3. Identified need and future demand and;
4. Trends at Bicester Hotel Golf and Spa (BHGS);

PART II

GOLF TRENDS

GOLF TRENDS

GOLF TRENDS

Golf Around the World

At the beginning of 2019 there were 38,864 golf courses around the world located in 209 countries. Of the total supply, 78% of golf courses are located in the top 10 golfing countries including the US, England and Australia. The United States of America leads the world with 43% of the supply with a total of 16,752 golf courses across the country.

Country	Courses	Holes	Facilities
United States	16,752	248,787	14,640
Japan	3,169	45,684	2,227
Canada	2,633	36,591	2,265
England	2,270	31,620	1,936
Australia	1,616	23,505	1,532
Germany	1,050	14,100	736
France	804	10,971	643
Korea, Republic of	798	9,183	440
Sweden	662	9,303	471
Scotland	614	8,421	568

The more mature, larger golf markets have experienced a disproportionately higher number of closures in recent years than elsewhere in the world. This suggests a “course correction” from over-development in prior decades. The US, UK, Japan, Australia and Canada account for 80% of recent closures while combining for 68% of total course supply.

Golf in Europe

At the beginning of 2019 there were 8,940 golf courses located in 44 countries across Europe, which totals 23% of the World’s golf supply.

The growth of Golf in Europe has been relatively uneven; however, it is now well established throughout the north and west of Europe and is making steady progress into the central and south eastern regions. The continent is now home to half of the top-20 countries in terms of golf courses:

#	Country	Courses	Holes	Facilities
4	England	2,270	31,620	1,936
6	Germany	1,050	14,100	736
7	France	804	10,971	643
9	Sweden	662	9,303	471
10	Scotland	614	8,421	568
12	Spain	497	7,071	413
13	Ireland	494	7,530	438
17	Denmark	346	4,461	193
18	Netherlands	330	3,924	220
19	Italy	321	4,131	267

GOLF TRENDS

KPMG’s annual survey of the state of the golf industry in Europe has found there were just under 4.2 million golf club members in the continent in 2018, representing a 0.8% decline year on year. The research, conducted on 2017’s figures from national golf unions, found that England remained the dominant market in terms of members, closely followed by Germany, each with over 640,000 members. Sweden is the next biggest market with nearly half a million golfers, followed by France, the Netherlands, Spain, Scotland and Ireland.

More than 75% of countries in Europe indicated that the level of participation in 2017 had either stabilised or increased. The remaining 24 per cent of European markets still experienced some decline, including key markets such as England, Scotland, Ireland and the Netherlands. The overall participation rate for Europe has remained stable since 2015. We note that England has double the courses of the next largest European golf market, Germany.

Overall, the European golf market has continued to stabilize both in terms of numbers of registered golfers and golf courses in operation, although some countries did record noticeable changes.

Golf in Great Britain

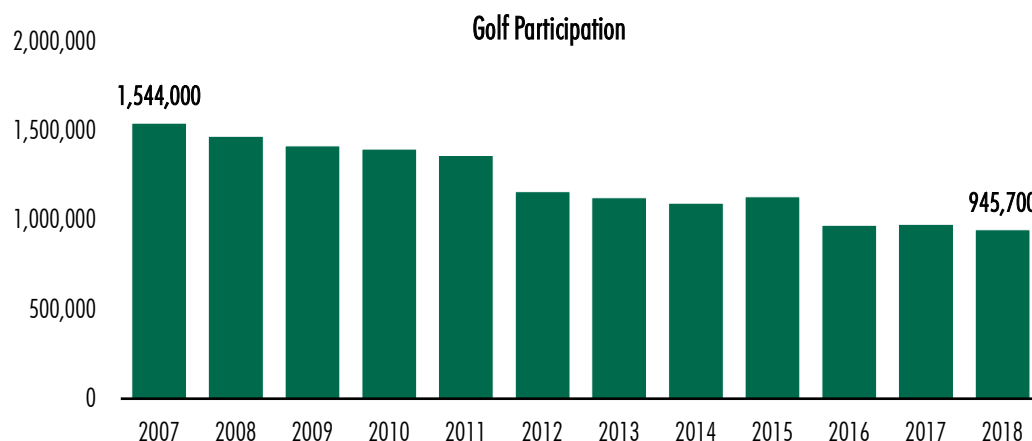
Golf has its origins in the sandy soil of the British coastal terrain. The naturally draining, moderate climate offered the ideal conditions for the sport to develop across links courses. As the sport grew in popularity, golf courses were developed on inland sites including open meadow, farmland and tree-lined parkland.

Great Britain and Ireland continue to be a sought after and popular location for golf, with the number of courses totalling 3,573, representing c. 40% of Europe’s golf courses. It is also home to some of the best golf courses in the world with a strong presence in the Top 100 Rated.

Golf in England

Participation

Golf is the fifth largest participation sport in England, however we are seeing a continued decline in the number of people participating year on year. Since 2007 there has been a total decline in participants of 38.8%, representing an average year on year decline of 4.47%.



GOLF TRENDS

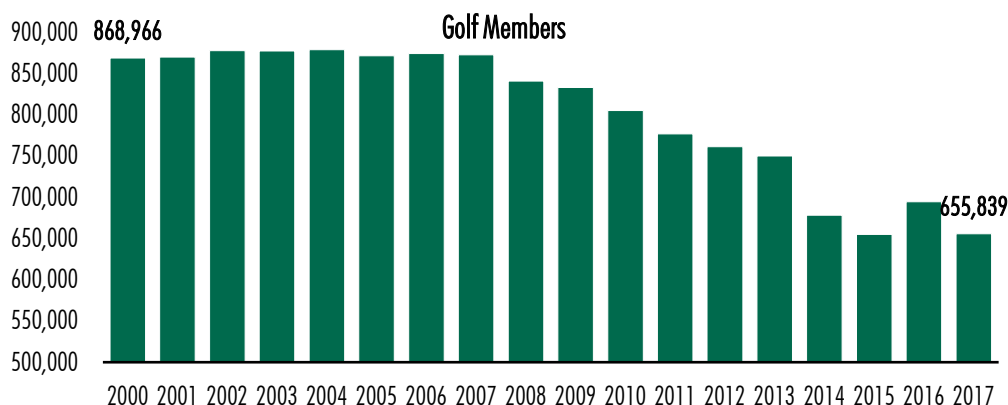
This decline has stabilised over the last three years as we are seeing that clubs are increasingly ready to evolve to meet their customers’ needs. Clubs are offering a larger spread of membership options to accommodate more people, including flexible, points-based memberships for those who are time poor.

Adventure golf is probably the game’s biggest trend at the moment with over 6 million participating last year. There is also an increase in the number of 9-hole clubs, further assisting those who are more time poor.

Members

The total number of golf members in England has seen an average year on year decline of 1.64% between 2000 and 2017. Although 2016 showed a small improvement from the 2015 low of c.655,000 this has not been sustained and membership declined again in 2017 back to c.655,000.

The average number of members per club has risen from 460 members per club in 2016 to 484 members per club in 2018, the highest it has been in 6 years. This is the first time in over a decade that the results have shown average golf club membership growth, suggesting that golf course supply is starting to re align with the fall in participation/ membership. (see the next section on courses)

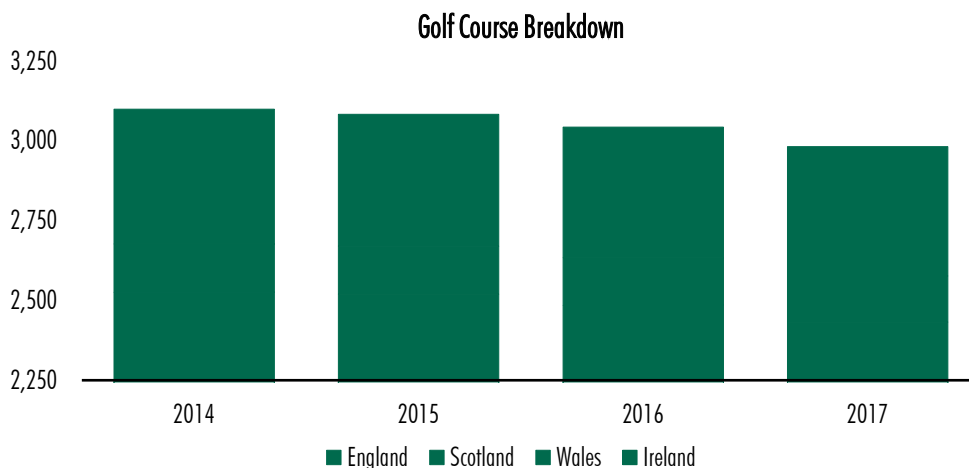


Source: Golf Engagement Statistics, Statista

GOLF TRENDS

Courses

However, from 2015 the number of golfing facilities has fallen from 1,991 to 1,936, representing a year on year decline of 1.39%. This has been mirrored across the UK, with an overall drop in facilities of c. 3.8% from 2014 with Scotland seeing the strongest decline of c. 6.2%. This shows supply starting to adjust to the fall in participation.



Breakdown

AGE BANDING	2014	SPLIT %	2016	SPLIT %	2018	SPLIT %
0-15	21	4%	21	4%	22	4%
16-19	15	3%	15	3%	12	2%
20-25	16	3%	16	3%	16	3%
26-29	13	3%	14	3%	15	3%
30-34	19	4%	17	4%	18	4%
35-44	41	9%	41	8%	40	8%
45-54	85	18%	81	17%	84	16%
55-64	109	23%	109	22%	115	22%
65 Plus	148	32%	171	35%	190	37%
Total	467	100%	485	100%	512	100%

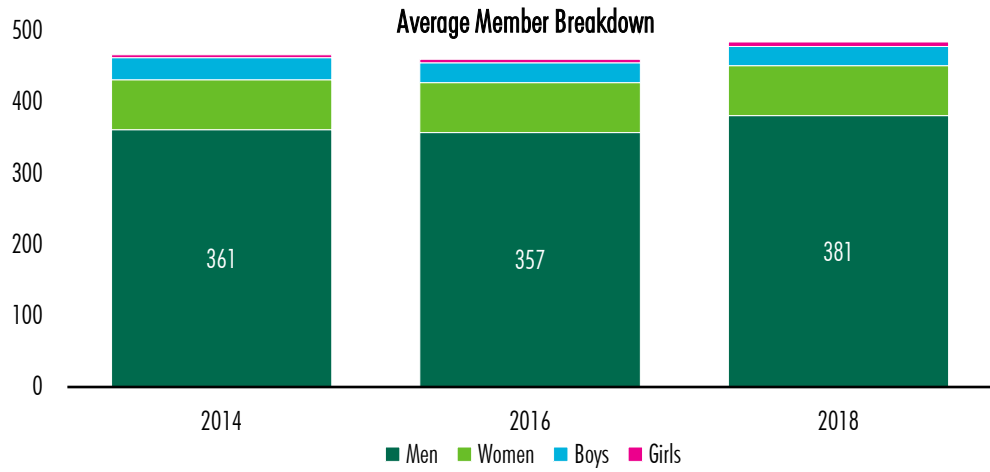
As can be seen the average number of members per club has not materially changed in recent years albeit recent trends have reversed a gradual decline that has been seen since late 1990's. This is partially a result of more flexible membership and due to more golf courses closing in each year. The average member base is still well below what it was in mid 1990s through early 2000's where it was well over 600.

Another stark statistic is the age banding of the member base. Almost 60% of members are made up of 55+ year olds and over 37% from 65+.

GOLF TRENDS

Gender

Another element that the industry is having to deal with is the breakdown of the members and participants. The sport is still heavily dominated by men as seen in the graph below.



GOLF TRENDS

Golf Changes and Trends

Playing Formats

Where golf participation and membership numbers have been healthiest we have seen a number of new (non 18-hole) formats being trialled.. These include but are not limited to the following:

- **Golf App (Pay by Hole)** - A new golf app that enables players to pay by the hole rather than always for a full round is part of moves to develop shorter formats of the game that can get more people playing and better utilise course capacity outside peak times.
- **Golf Sixes** - Played over six holes - a third of the usual number in a standard round of golf - using the greensomes format. Both players in a pair hit a tee shot at each hole and then choose which ball to continue with. The pair that wins the hole get three match points and the pair with the most points wins the match.
- **SPRINT6GOLF** - a quicker, shorter format of golf for players of all ages and abilities. SPRINT6GOLF is played over just six holes and utilises a free mobile app with a 30-second shot clock to ensure a flowing and continuous pace of play.
- **Golf Express** - Run by England Golf and offers the nine-hole round of golf as a complete and enjoyable experience that is consistent with the traditions of playing the game. Under the slogan of "All the game in half the time", it hopes to be one of the solutions to getting more people playing through promoting shorter rounds that golfers can fit into busy lifestyles in which two hours is now the span for most leisure activities.
- **Royal Troon** - has developed a shorter, nine-hole version of its 'Monument' course, called Monument Express.

Findings

1. England Golf has reported a 50% increase in nine hole competitive scores returned between 2014 and 2017 (70,127 to 105,254). Between 2016 and 2017, competitive nine hole club rounds by males increased by 17% (50,667 to 59,336) and 6% by females (43,314 to 45,918).
2. Golf's professional circuits are also embracing shorter formats of the game with the exciting GolfSixes event recently played on the European Tour and the popular junior GolfSixes League expanding through new partnerships across Europe. Meantime, England Golf and the European Tour have just announced a partnership which will start by engaging members at over 1,900 clubs through GolfSixes.
3. The R&A conducted a survey on pace of play which revealed that 60% of golfers would enjoy golf more if it took less time. It also identified that among 25-44 year-olds who are unhappy with the pace of play, 21% would like to see the playing time reduced by as much as one and a half hours, while 19% said they would welcome the opportunity to play nine holes more often as an alternative format.

PART III

LOCAL GOLF CLUB PROVISION

LOCAL GOLF CLUB PROVISION

LOCAL GOLF CLUB PROVISION

Provision in Cherwell

There are currently 8 golf sites in Cherwell. Notably, there are no Par 3 courses in Cherwell since the closure of the Drayton Leisure in 2014 and Golf site near Banbury, and the Kirtlington Course which has 27 holes.

Wider Golf Catchment

We have also looked at provision of golf courses based on both distance from the subject site and drive time. This includes golf courses outside of Cherwell district but in some cases geographically closer.

Golf Provision by Distance

In assessing the surrounding golf provision in the area, we first looked at the geographical spread of golf provision in the surrounding area. The provision by distance from the subject is summarised in the following table. We have looked at 20 and 25 mile radii, this is broadly in line with BGH membership base. This is what we consider a reasonable drive distance across which to assess competing golf provision.

	20 MILES	25 MILES
Courses	32	46
27 hole +	3	3
18 hole	23	36
9 hole	6	7

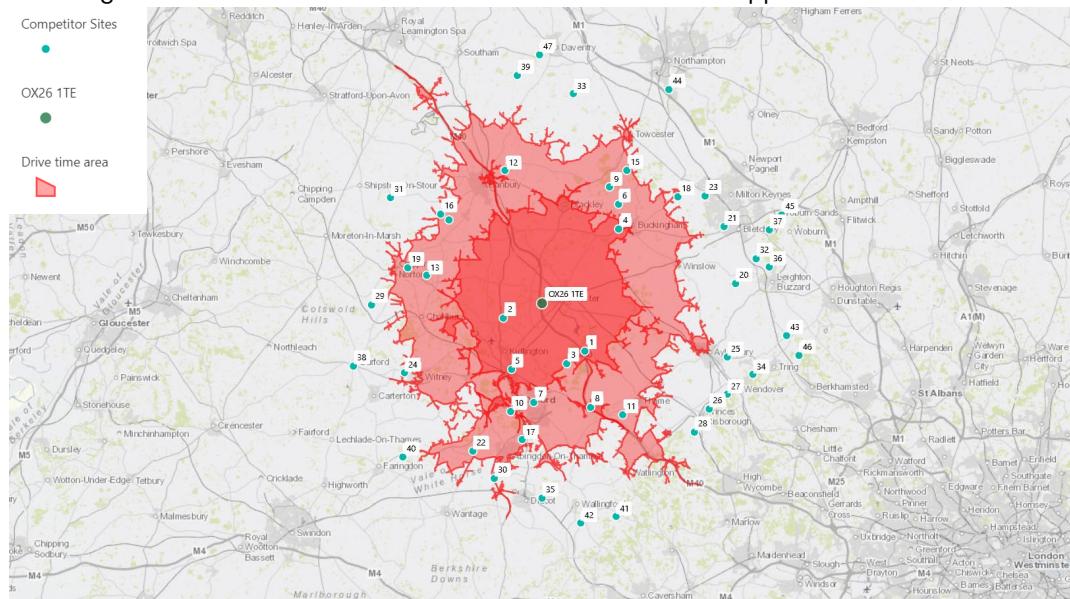
Source: England Golf 08/07/19

Golf Provision by Drive Time

The spread of golf provision means that everyone with access to a car can reach a course within 20 or 30 minute drive time. This is what we consider a reasonable driver time and this is broadly in line with the BGH’s membership base to assess competing golf provision. The following map graphic summarises the golf provision in the local area and how the provision sits with reference to the drive time. The findings are summarised within the

LOCAL GOLF CLUB PROVISION

following table and a full annotated list of clubs is included at Appendix B.



	20 MINUTES	30 MINUTES
Courses	5	19
27 hole +	1	2
18 hole	4	14
9 hole	0	3

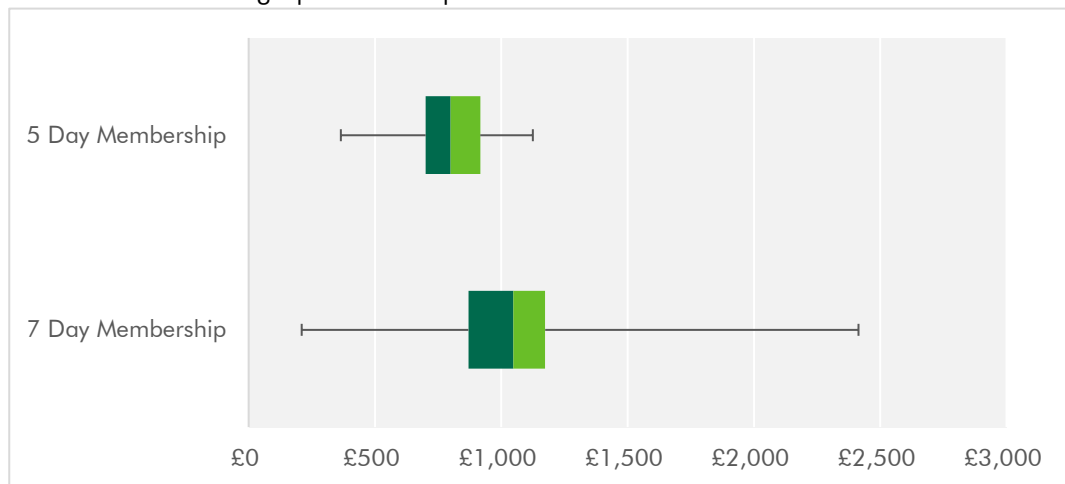
Source: England Golf 08/07/19

- The local golf offer covers most of the main ways that golf is typically played. The standard 18 hole and 9 hole golf formats, to shorter Par 3 courses, driving ranges are all represented in the catchment.
- In line with much of the UK the golf provision in the local area is heavily weighted towards 18 hole formats;
- 5 courses are within a 20 minute drive of the subject property. There is no dedicated 9 hole format provision within this key drive time;
- 19 courses are within a 30 minute drive time of the subject property. 16 of these are within the 18 hole format and only three are 9 hole courses;

LOCAL GOLF CLUB PROVISION

Membership Rates

We have examined the annual golf membership rates in the catchment as at the report date to see if any conclusions can be drawn about competition in the market. Of the 32 courses in a 20-mile radius we collected membership subscription rates as at 08/07/19 for 27 clubs. The following graphs summarise the membership subscription rates in the catchment. The box and whisker graphs are interpreted as above.



Source: CBRE research

- Interquartile range for 7-day membership is an annual fee of £870 - £1,175 with an average of £1,050;
- Interquartile range for 5-day membership is an annual fee of £700 - £920 with an average of £800;
- There are a range of different grades of course for a variety of different price ranges;
- The courses that have significant joining fees typically don't offer 5 day membership plan option. These two factors are indicative of businesses that are mature or nearing capacity;
- In this catchment, almost all courses offer 5-day membership plans and very few courses advertise a joining fee. These factors, combined with tightly grouped pricing of both 7 and 5 day subscriptions suggests a highly competitive, over saturated market;

LOCAL GOLF CLUB PROVISION

Key Golf Demographics in Cherwell

We have examined the demographics in the local area and note the following points.

CHERWELL	2016	2021	2026	2031
Total Population	148,276	173,281	191,042	202,676
CAGR (Total)		3.17%	1.97%	1.19%
60+ Population	33,708	39,823	47,263	53,827
CAGR (60+)		3.39%	3.49%	2.64%
Male % (Total Population)	49%	49%	49%	49%
Male 60+ Population Extrapolation*	16,658	19,680	23,373	26,619
CAGR (Male > 60)		3.39%	3.50%	2.64%

Source: Population Projections By Sub Area (Including Proposed Growth in the Partial Review Plan) within Cherwell District Council Open Space, Sport and Recreation Assessment and Strategies Paper dated 1 October 2018

* estimated by applying the population of over 60s with the percentage of males across the wider population;

- The key golfing demographic (over 60 males) is growing in the local authority at a faster rate than the general population growth. The over 60 demographic is increasing in the catchment giving the picture of an aging population;
- The average annual growth in over 60 males increases from 3.4% up to 2021 to 3.5% from 2021-2026 before falling back to 2.64% up to 2031;
- We would expect the area to have strong demand for golf given its affluent south east England location and strong male over 60 demographic;

	CHERWELL (2016)	UK (2017)
Golf Members	2,695	655,839
Population	148,276	66,040,000
Members per 1000 Population	18.18	9.93

Sources: Golf England (Unpublished Stats Within Cherwell District Council Open Space, Sport and Recreation Assessment and Strategies Paper dated 1 October 2018), Golf England (published stats), ONS UK.

- Examination of the average Participation in the region supports this, showing Cherwell with a much higher participation (almost double the national average) 18.18 per 1,000 inhabitants in Cherwell compared to 9.93 inhabitants across the UK;
- England Golf commented further within the local authority report that there are good/strong levels of interest across all 9 of the market segments they analysed.

Supply / Capacity

England Golf provided unpublished information to Cherwell council from their 2016 England Golf Club Survey. This shows that the average number of members within clubs in Cherwell is broadly in line with the rates across the other adjacent authorities. It also shows that these levels are all materially lower (16% lower) than the average for England as a whole. The findings are summarised in the following table.

LOCAL GOLF CLUB PROVISION

Average Affiliated Members Per Club

DISTRICT	AVERAGE AFFILIATED MEMBERS PER CLUB
Cherwell (2016)	385
Vale of White Horse (2016)	364
South Oxfordshire (2016)	320
West Oxfordshire (2016)	385
England (2016)	460
England (historic pre 2007)	c.600

Source England Golf and EG Club Survey 2016

- We would first highlight the very low members per club in Cherwell and the immediately surrounding districts in comparison to England. This is especially stark when you take into account that the participation rate is approximately double in Cherwell in comparison to that at a country level;
- We have been provided confidential Membership data and as at the report date the number of golf members at BHGS is materially lower than any of these levels;
- Nationally the rate of participation in golf fell between 2007 and 2016 and historically average memberships were much higher across the UK;
- High participation and low members per club is indicative of a market with a large oversupply. This is corroborated by the information above on pricing further building a picture of a very strong competitive environment with no / low joining fees and tightly grouped subscriptions.

PART IV

IDENTIFIED NEED AND FUTURE DEMAND

IDENTIFIED NEED AND FUTURE DEMAND

IDENTIFIED NEED AND FUTURE DEMAND

INTRODUCTION

The general picture across the UK (as described in the preceding sections) is that of declining participation and membership, particularly in traditional 18 hole golf formats. This is putting traditional golf operators across the country under pressure. This picture is also borne out by CBRE's experience in golf real estate markets where in addition to this we would comment that this trend applies to all the courses we have examined (including premium, trophy and smaller local offers).

The Cherwell District Council Open Space, Sport and Recreation Assessment and Strategies Paper (2018) by Nortoft Partnerships Limited concludes that the local provision is currently slightly oversupplied currently but will progress to undersupply by 2031. This is at odds with what we are experiencing in the market. We have reviewed this report, its methodology and findings and make comment below, comparing and contrasting with the wider research base available on the UK golf market as well as our broader involvement and experience within the UK golf real estate market. In the following sections we explore some possible reasons for the disparity between what we are experiencing on the ground and the planning policy assessment's findings.

We have reviewed the following information:

- ONS Population Forecasts;
- Cherwell District Council Open Space, Sport and Recreation Assessment and Strategies Paper dated 1 October 2018 by Nortoft Partnerships Limited;
- Published UK statistics from England Golf;
- KPMG European Golf Participation Reports;

General Supply Inelasticity

The ability of real estate to adjust supply to price changes is quite high. However in the short run and on a micro basis, real estate supply is notoriously slow to adjust. A key contributory factor in this short run inelasticity is planning policy and local zoning protecting uses.

Golf supply is a good example of this as there has been a large and well documented oversupply in the UK golf market for over 10 years caused by a significant decline in utilisation, while supply has started to adjust in recent years the market still exists in a state of oversupply. Many local planning authorities still seek to protect under-utilised property in their areas on the basis of the potential loss of amenity in spite of obvious oversupply.

This position is borne out in the surrounding local authorities none of which identify a current demand for additional golf.

IDENTIFIED NEED AND FUTURE DEMAND

Golf Policy in Surrounding Local Authorities

LOCAL AUTHORITY	COMMENT
Aylesbury Vale	No indication that the courses were operating at full capacity, and the conclusion was that no additional courses were required.
Oxford City	the strategy did not identify a need for additional facilities within the city.
South Northamptonshire	The priorities are to retain and maintain the existing golf courses and facilities but also to support the golf sites to remain open in economically challenging times.
South Oxfordshire	existing golf courses should be protected and that planning policies should be flexible to support new golf provision in various formats.
Stratford-on-Avon	Did not assess
The Vale of White Horse	The priority is to encourage the existing golf sites to remain open, and if possible enable the development of new courses and driving ranges in the Wantage/Grove area.
West Oxfordshire	Did not assess

Lack of Information

Real estate markets slow to adjust as described above, this market inefficiency is exacerbated in low information opaque markets such as the golf real estate market. There is not an abundance of open source information to easily and accurately assess supply and demand of golf course provision on a micro level in any given district. We consider that this contributes to the inelasticity of this market in particular.

Report Methodology

We note a few points within the method for the assessment of future needs undertaken by Cherwell District Council.

Demand Shift to Shorter Formats

Examining golf provision by hole does not take into account of the shift in demand away from traditional 18 hole provision, where there is well documented significant oversupply, to shorter quicker formats. Although provision is not distinct, demand for each format is and there is therefore a risk of misrepresentation if the two are looked at on a blended basis.

IDENTIFIED NEED AND FUTURE DEMAND

Catchment Area

The modelling within the Open Space, Sport and Recreation Assessment and Strategies by Nortfort Partnerships Limited, 2018 includes the golf sites within Cherwell, but excludes sites outside of the district. Golf members frequently drive 20 minutes or more to their club (being 'blind' to local authority boundaries) meaning that any golf club will realistically compete with courses up to as far as 40 minutes drive away. Any loss of provision would ideally therefore be considered against the backdrop of the remaining provision within a 20-30 minute drive.

As is shown from the map of golf supply in the area in the preceding section **there is significant additional provision in the wider area beyond the provision that is located in Cherwell**. In addition to this it is therefore inappropriate to examine provision within the smaller areas of Banbury, Kidlington and Bicester in isolation.

Maximum Capacity Assessment

Within the assessment of future needs undertaken for Cherwell District Council the maximum "used capacity" of the clubs in Cherwell was assessed by comparing their average membership to the national average of 460 members per club as an indication of capacity. Applied to Cherwell districts clubs this produces a capacity of 4200. **This does not take into account the large decline in membership in recent years** and if capacity is significantly understated if examined in this way.

In the early 2000s average membership per club was in excess of 600 members per club. This is a much more appropriate measure of capacity however we consider that this would still be a prudent level to adopt as by its very nature of being an average many clubs will be operating with significantly higher numbers of members.

IDENTIFIED NEED AND FUTURE DEMAND

Assessment of Future Needs Methodology

The Open Space, Sport and Recreation Assessment and Strategies paper dated August 2018 prepared by Nortoft Partnerships Limited sets out three approaches to the modelling of future needs. The first two approaches forecast the needs for golf based on the current provision. The third considers the likely growth in club membership in the sub areas, using the average club membership figures per club provided by England Golf.

- **Method 1** - Average rate of provision across the district - This approach takes the current district wide average rate of supply of golf facilities per 1,000 population (18.18) and extrapolates the future demand based on the population growth of Cherwell for each sub area. Beyond the point made above regarding golf within the sub areas this relies on the assumption that the current supply / demand relationship is in equilibrium or at capacity. As set out above there is a significant over supply in the catchment and this is not accounted for within this method.
- **Method 2** - Sub area rate of provision – This approach follows the same method as above however takes the current rate of provision of golf facilities within each of the sub areas as the starting point for the future modelling instead of the district level figure. This method has the same defects as above and is not appropriate for assessing demand;
- **Method 3** - Modelling future growth based on membership - forecasts forwards the expected membership of Cherwell golf clubs based on the population growth. This is based on:
 - the known average club membership figure of 385 for Cherwell;
 - based on the England Golf 2016 information for the 7 membership clubs in the district, giving a total of 2,695 golf members in 2016. With a current Cherwell population of 148,276, this gives an average rate of golf club membership of 18.18 per 1,000 population;
 - The 2016 national average rate of membership per golf course 460 members, based on information provided by England Golf.

This method is the best of the three but does not take into account three key factors:

- As recently as 2007 average golf course membership across the UK were as high as 600 members per club, we therefore consider capacity on a per course basis should not have materially changed since then;
- If the long term membership trend shows a large fall with an average year on year decline of 1.55% pa between 2000 and 2018 and 2.56% pa between 2007 and 2018;
- Adjustments for the age distribution of the local population in Cherwell district;

Each of these methods fails to allow for key elements and trends in golf course supply and they are therefore not appropriate for assessing demand. However “Method 3” could be adjusted to allow for these factors giving a better projection;

IDENTIFIED NEED AND FUTURE DEMAND

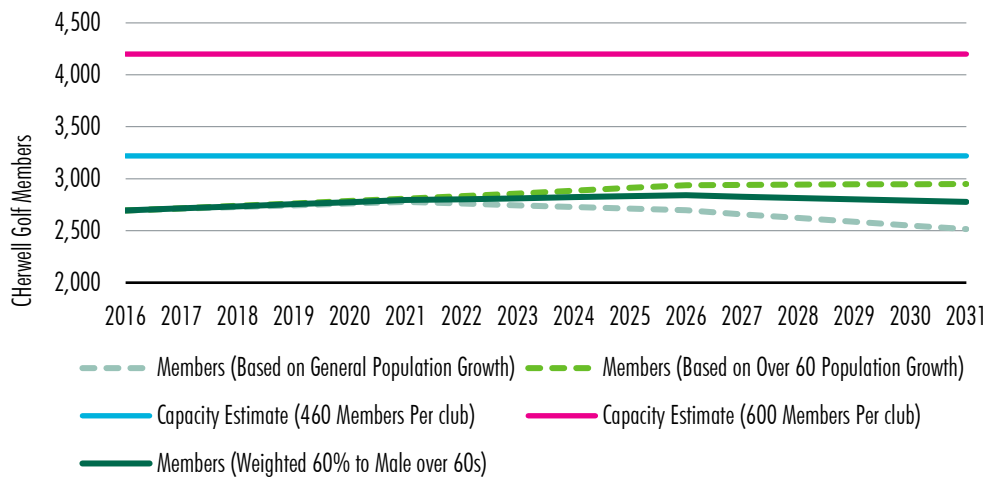
CBRE Future Demand Estimate

We have adapted the third method described above to correct for:

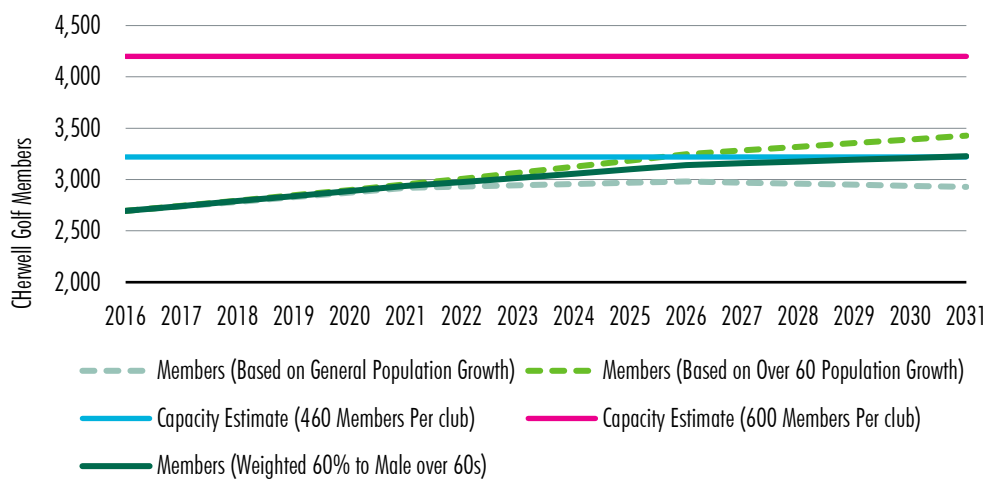
- The current state of oversupply;
- Long run downward trend in participation;
- The weighting of golf membership towards the male over 60 demographic;

We note that this assessment is subjective, and we have therefore undertaken sensitivity analysis in the form of two scenarios. In scenario 1 we model decline in golf participation in line with the trend from 2000 and in scenario 2 we adopt the trend from 2007. The output of these scenarios is summarised in the following Supply/Demand graphs. The method adopted is set out in detail within Appendix C.

2000 Trend (Scenario 1)



2007 Trend (Scenario 2)



IDENTIFIED NEED AND FUTURE DEMAND

Key finding is that allowing for the membership decline and at more appropriate capacity estimates, the Cherwell market shows a strong oversupply on all scenarios, there is significant excess capacity and no new courses are required in the catchment. Even on very conservative capacity estimate adopted within the demand assessment carried out on behalf of the Local Authority there is unlikely to be demand for additional golf provision over the time period examined.

Conclusion

- We consider that the Cherwell market, like that of much of the UK is over-supplied.
- “course correction” is ongoing from over-development in prior decades in all mature golfing nations including the UK;
- Additional competition for potential members time;
- Move away from longer traditional formats;
- Dramatic reduction in golf members and participation 2007 – 2017 and 2000 -2017;

Membership and Participation Decline 2007 - 2017

	2007	2017	NET CHANGE	ANNUAL CHANGE
Membership	872,665	655,839	-25%	-2.82%
Participation	1,544,000	977,300	-37%	-4.47%

Membership Decline 2000 - 2017

	2000	2017	NET CHANGE	ANNUAL CHANGE
Membership	868,966	655,839	-25%	-1.64%

- Number of members per club fallen from around 600 to around 485;
- Number of golf courses in UK started correcting in 2015 and has shown a 1.39% pa decline ever since.
- Suggests a large oversupply at UK level particularly of 18 hole format;
- Courses driven to adapt to become more reliant on other income streams;
- The local golf offer covers most of the main ways that golf is typically played. The standard 18 hole and 9 hole golf formats, to shorter Par 3 courses, driving ranges are all represented in the catchment.
- There are a range of different grades of course for a variety of different price ranges in the local catchment;
- In general courses that have significant joining fees typically don’t offer 5 day membership plan option. These two factors are indicative of businesses that are mature or nearing capacity;
- In this catchment, almost all courses offer 5-day membership plans and very few courses advertise a joining fee. These factors, combined with tightly grouped pricing of both 7 and 5 day subscriptions suggests a highly competitive, over saturated market;

IDENTIFIED NEED AND FUTURE DEMAND

- Examination of the average participation in the region shows Cherwell with a much higher participation (almost double the national average) 18.18 per 1,000 inhabitants in Cherwell compared to 9.93 inhabitants across the UK;
- We would highlight the **very low members per club in Cherwell and the immediately surrounding districts in comparison to England**. This is especially stark when you take into account that the participation rate is approximately double in Cherwell in comparison to that at a country level;
- **High participation and low members per club is indicative of a market with a large oversupply**. This is corroborated by the information above on pricing further building a picture of a very strong competitive environment with no / low joining fees and tightly grouped subscriptions;
- **We examined the methods adopted by the local authority and found that they are not appropriate** because:
 - Demand Shift to Shorter Formats;
 - Catchment Area too small;
 - Maximum Capacity Assessment does not take into account oversupply and dramatic fall in members per club;
 - Demographic weightings not allowed for;
- CBRE adapted the local authority method to project future take up/ supply and ran two scenarios:
 - Both scenarios adjusting method 3 to take into account fall in golf participation/ membership over the whole catchment and adopt a more robust assessment of the spare capacity in the market;
 - Both scenarios offset long run membership decline (since 2000 and 2007) against population growth (we note that the trend since 2007 has been materially higher);
 - Both assessments best case and show membership growth projections in line with both growth in line with population growth rate of Cherwell as well as the population growth rate of the key golfing demographic (male over 60) which is growing quicker than the wider population;
 - Both assessments plot a weighted average of these numbers;
- Key finding is that allowing for the membership decline and at more appropriate capacity estimates the **Cherwell market shows a strong oversupply on all scenarios, there is significant excess capacity and no new courses are required in the catchment**. Even on very conservative capacity estimate adopted by the Local authority demand assessment there is unlikely to be demand for additional golf provision before 2031;

PART V

TRENDS AT BICESTER HOTEL GOLF AND SPA

TRENDS AT BICESTER HOTEL GOLF AND SPA

TRENDS AT BICESTER HOTEL GOLF AND SPA

BUSINESS PERFORMANCE

We have been provided some headline trading information by the management at BHGS. They have shared the total number of golf members, total golf membership revenue (this is the most important revenue line for almost all golf clubs) and average membership revenue with us. We are unable to disclose this confidential data in the report however we note the following headline trends.

Members

The number of golf members was showing a downward trend until 2013/14 when there was an increase as a result of a pricing initiative. This then falls away with large year on year reductions in member numbers thereafter.

Average Member Revenue

Average membership had been increasing incrementally each year to 2014. In 2014 there seems to have been a pricing initiative to attempt to arrest the gradual membership decline. There have been incremental year on year increases in average membership revenue since this time.

Membership Revenue

Membership revenue declined in 2012, increasing in 2013 due to the combined impact of a small increase in membership and incremental pricing increase. This increase was maintained in 2014 and 2015 following a significant price down. Ultimately in 2016 and beyond falling membership has outstripped incremental increases in average pricing and overall revenue has declined drastically across the period;

MEMBERSHIP DEMOGRAPHICS

Distribution

We have been provided anonymised member address information by the management at BHGS. We have plotted this against drive time and against the Cherwell district and other competing golf courses.

We make the following observations:

- (c.73%) of the members live within Cherwell District;
- Members distribution broadly fits within the 20 – 30 minute travel times described above with some members traveling materially further;
- All members of BHGS are within 20 minutes drive of a range of different other golf offers including several 18 hole offers;

TRENDS AT BICESTER HOTEL GOLF AND SPA

CONCLUSIONS

We draw the following conclusions from these observations:

- Membership revenue is falling for the golf element at BHGS and this aligns with the picture in the wider golf market;
- A pricing reduction strategy briefly reversed this trend but in spite of this membership has continued to decline since. This indicates the issue is not an issue of price sensitivity but of underutilisation and oversupply. This is also symptomatic of conditions within the wider golf market;
- We have been provided a snapshot summary of member ages and gender. These broadly align with the typical golf demographics for the UK. From this we infer that the membership socio-economic background broadly matches that of golf members across the UK which is predominantly middle aged, affluent and male. The golf course is not likely to be providing amenity to a broad range of Cherwell residents, only a small exclusive minority have access. Particularly in comparison to the waterpark that would replace it.
- There is significant additional 18 hole golf provision within an acceptable drive time for members that want it. In addition, the likely demographic subset overwhelmingly has access to a car and significant alternate 18-hole provision within a 20 minute drive time with some members traveling materially further;
- Loss of 9 holes of golf from BHGS is therefore unlikely to constitute a material loss of amenity to most Cherwell residents or damage the wider hotel and leisure operation on the site;

PART VI

CONCLUSION

CONCLUSION

CONCLUSION

Item	Summary / Conclusion
Golf Trends	<p>There are a number of trends currently impacting / affecting the golf sector and these are broadly as follows:</p> <ul style="list-style-type: none"> ■ Declining membership across courses / clubs ■ Average age of participation has increased year on year and now stands at over 63 and is heavily dominated by white males. ■ Enhanced range of leisure activities competing for the same social/free time as golf ■ The sport is struggling to be more family orientated / family friendly ■ Cost is also a major barrier to entry with golf memberships and green fees still at the higher end of the overall leisure spectrum
Local golf club provision	<p>We would summarise as follows:</p> <ul style="list-style-type: none"> ■ The local provision of golfing facilities is sufficient and there is a strong case to suggest it is oversupplied ■ Memberships across the majority of the courses have been in decline in recent years ■ Clubs have largely eradicated joining fees indicating there is a demand/supply imbalance
Identified need and future demand	<ul style="list-style-type: none"> ■ We examined the methods adopted by the local authority and found that they are not appropriate because: <ul style="list-style-type: none"> – Demand Shift to Shorter Formats; – Catchment Area too small; – Maximum Capacity Assessment does not take into account oversupply and dramatic fall in members per club; ■ CBRE ran two scenarios adjusting the Local Authority’s method for these factors: <ul style="list-style-type: none"> – First assessment adopts a best case and allows for membership growth in line with the population growth rate of the key golfing demographic which is growing quicker than the wider population; – The second assessment is a base case and allows for membership growth in line with population growth rate of Cherwell; – CBRE consider that membership demand in the catchment will likely sit between these levels. ■ Key finding is that allowing for the membership decline and at more appropriate capacity estimates the Cherwell market shows a strong oversupply; there is significant excess capacity; and no new courses are required in the catchment. Even on very conservative capacity estimate adopted by the Local authority demand assessment there is unlikely to be demand for additional golf provision before 2030 even allowing for best case scenario for membership growth based on the growth of the over 55 males key demographic growth.
Trends at BHGS	<ul style="list-style-type: none"> ■ There is an oversupply of 18 hole courses in the area and the trade of the golf operation at BHGS is in decline. The course’s membership and membership revenue has fallen significantly. This is in line with the wider oversupply in the UK. The importance of this income has fallen in the context of the wider hotel and leisure business; ■ Loss of 9 holes of golf from BHGS is unlikely to damage the wider hotel and leisure business; ■ The retained 9 holes would not constitute a material loss of amenity given the shift in demand to shorter formats and it may be a more viable option for the owner of BHGS long term to develop and improve the remaining 9 holes; ■ There is significant additional 18 hole golf provision within an acceptable drive time for members that want it. In addition, the likely demographic subset overwhelmingly has access to a car and significant alternate 18-hole provision within a 20 minute drive time; ■ The golf course is providing amenity to only a very small proportion of the total population of Cherwell and the wider area;

CONCLUSION

Yours faithfully



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Yours faithfully



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PART VII

APPENDICES

CONTENTS

- A. GOLF PROVISION IN THE LOCAL CATCHMENT**
- B. CBRE DEMAND ASSESSMENT METHODOLOGY**

APPENDIX A

GOLF PROVISION IN THE LOCAL CATCHMENT

SCHEDULE OF RENTS

#	CLUB	ADDRESS	POSTCODE	DIST (MI)
1	Bicester Hotel Golf & Spa	Green Lane Chesterton, Bicester	OX26 1TE	0
2	Kirtlington Golf Club	Kirtlington Golf Club Kirtlington, Oxford	OX5 3JY	4.35
3	Magnolia Park Golf And Country Club	Arncott Road Boarstall, Aylesbury	HP18 9XX	6.32
4	Studley Wood Golf Club	The Straight Mile Horton-Cum-Studley, Oxford	OX33 1BF	6.49
5	North Oxford Golf Club	Banbury Road, Oxford	OX2 8EZ	7.42
6	Oxford Golf Club	Hill Top Road Cowley, Oxford	OX4 1PF	10
7	Buckingham Golf Club	Tingewick Road, Buckingham	MK18 4AE	10.65
8	Hinksey Heights Golf Club	South Hinksey, Oxford	OX1 5AB	11.34
9	Waterstock Golf Club	Thame Road Waterstock, Oxford	OX33 1HT	11.42
10	Heythrop Park Resort	Heythrop Park Enstone, Chipping Norton	OX7 5UF	12.01
11	Stowe Golf Club	Stowe House Stowe, Buckingham	MK18 5EH	12.28
12	Rye Hill Golf Club	Milcombe, Banbury	OX15 4RU	12.59
13	Silverstone Golf Club	Silverstone Road Stowe, Buckingham	MK18 5LH	13.23
14	Tadmarton Heath Golf Club	Wigginton, Banbury	OX15 5HL	13.55
15	The Oxfordshire	Rycote Lane Milton Common, Thame	OX9 2PU	13.62
16	Cherwell Edge Golf Club	Chacombe Banbury, Oxon	OX17 2EN	13.72
17	Radley Golf Club	Radley College Kennington Road, Abingdon	OX14 2HR	13.86
18	Cotswolds Club	Southcombe Chipping Norton, Chipping Norton	OX7 5QH	14
19	Whittlebury Park Golf Club	Whittlebury Hall, Nr. Towcester	NN12 8QH	15.54
20	Witney Lake Resort	Downs Road, Witney	OX29 0SY	15.61
21	Frilford Heath Golf Club	Oxford Road, Abingdon	OX13 5NW	16.38
22	Kingfisher Hotel Golf & Country Club	Kingfisher Hotel Golf & Country Club	MK19 6JY	17
23	The Wychwood Golf Club	Lyneham, Chipping Norton	OX7 6QQ	17.23
24	Drayton Park Golf Club	Steventon Road Drayton, Abingdon	OX14 4LA	18.18
25	Feldon Valley Golf Club	Sutton Lane, Banbury	OX15 5BB	18.53
26	Weston Turville Golf Club	New Road Weston Turville, Aylesbury	HP22 5QT	19.01
27	Aylesbury Vale Golf Club	Stewkley Road Wing, Leighton Buzzard	LU7 0UJ	19.17
28	Abbey Hill Golf Club	Monks Way Two Mile Ash, Milton Keynes	MK8 8AE	19.21
29	Hadden Hill Golf Club	Wallingford Road, Didcot	OX11 9BJ	19.45
30	Windmill Hill Golf Club	Tattenhoe Lane Bletchley, Milton Keynes	MK3 7RB	19.46
31	Whiteleaf Golf Club	Upper Icknield Way, Princes Risborough	HP27 0LY	19.58
32	Princes Risborough Golf Club	Lee Road Saunderton Lee, Aylesbury	HP27 9NX	19.77
33	Burford Golf Club	Burford	OX18 4JG	20.03
34	Ellesborough Golf Club	Wendover Road Butlers Cross, Aylesbury	HP17 0TZ	20.37
35	Carswell Golf And Country Club	Carswell, Faringdon	SN7 8PU	20.83
36	Farthingstone Hotel And Golf Club	Farthingstone, Nr Towcester	NN12 8HA	21
37	The Three Locks Golf Club	Great Brickhill, Milton Keynes	MK17 9BH	21.57
38	Chiltern Forest Golf Club	Aston Hill Halton, Aylesbury	HP22 5NQ	22.02
39	The Springs Golf Club	Wallingford Road, Wallingford	OX10 6BE	22.27

SCHEDULE OF RENTS

#	CLUB	ADDRESS	POSTCODE	DIST (MI)
40	Huntercombe Golf Club	Nuffield, Henley-on-Thames	RG9 5SL	22.5
41	Leighton Buzzard Golf Club	Plantation Road, Leighton Buzzard	LU7 3JF	22.72
42	Hellidon Lakes Golf Club	Hellidon, Daventry	NN11 6GG	22.82
43	Woburn Golf Club	Little Brickhill, Milton Keynes	MK17 9LJ	23.57
44	Ivinghoe Golf Club	Wellcroft Ivinghoe, Leighton Buzzard	LU7 9EF	24.4
45	Collingtree Park Golf Club	Windingbrook Lane Collingtree Park	NN4 0XN	24.61
46	Staverton Estate Golf Club	Daventry Road, Daventry	NN11 6JT	24.73
47	Aspley Guise And Woburn Sands Golf Club	West Hill Aspley Guise, Milton Keynes	MK17 8DX	25.24
48	Stocks Golf Club	Aldbury, Nr Tring	HP23 5RX	25.95

Source: England Golf 08/07/19

APPENDIX B

CBRE DEMAND ASSESSMENT METHODOLOGY

CBRE DEMAND ASSESSMENT METHODOLOGY

CBRE FUTURE DEMAND ESTIMATE METHODOLOGY

We have adapted the third method described above to correct for:

- The current state of oversupply;
- Long run downward trend in participation;
- The weighting of golf membership towards the male over 60 demographic;

We note that this assessment is subjective, and we have therefore undertaken sensitivity analysis in the form of two scenarios. In scenario 1 we model decline in golf participation in line with the trend from 2000 and in scenario 2 we adopt the trend from 2007. We make the following adjustments.

As in the local authority’s method 3, in both scenarios we forecast the expected membership of Cherwell golf clubs based on the population growth. This is based on:

- the known average club membership figure of 385 for Cherwell (2016);
- based on the England Golf 2016 information for the 7 membership clubs in the district, giving a total of 2,695 golf members in 2016. With a current Cherwell population of 148,276, this gives an average rate of golf club membership of 18.18 per 1,000 population;

Correcting for Current Oversupply

As stated above calculation of a maximum market capacity in line with the 2016 national average members per club does not take into account the large long-term decline in membership. Until 2007 average membership per club was in excess of 600 members per club. This is a much more appropriate measure of capacity however we consider that this would still be a prudent level to adopt as by its very nature of being an average many clubs would have been operating with significantly higher numbers of members. We therefore adopt this as a more robust assessment of the spare capacity in the market. The impact of this on the calculation of market capacity in Cherwell is shown in the following table:

	ESTIMATED CAPACITY OF CLUBS BASED ON NATIONAL AVERAGE MEMBERS PER CLUB	ESTIMATED CAPACITY OF CLUBS BASED ON HISTORIC 2007 NATIONAL AVERAGE MEMBERS PER CLUB	CHERWELL 2016 MEMBERS PER CLUB
Cherwell	460	600	385
Clubs	7	7	7
Capacity	3220	4200	2,695

We consider that the current market capacity could exceed 4,200 members for Cherwell.

Correcting for Downward Trend in Participation

We consider it appropriate to adjust method 3 to take into account the long run fall in golf participation/ membership in the UK. Membership has declined shown a general long term trend of decline. This decline has been sharpest since 2007 but before this membership was reasonably stable. The following tables set out the decline from 2007 (the start of the pronounced sharp decline) and 2000 (the earliest data point we have available).

CBRE DEMAND ASSESSMENT METHODOLOGY

Membership and Participation Decline 2007 - 2017

	2007	2017	NET CHANGE	ANNUAL CHANGE
Membership	872,665	655,839	-25%	-2.82%
Participation	1,544,000	977,300	-37%	-4.47%

Membership Decline 2000 - 2017

	2000	2018	NET CHANGE	ANNUAL CHANGE
Membership	868,966	655,839	-25%	-1.64%

We note that the trend since 2007 shows a materially sharper decline than that of the long run trend back to 2000 so, as mentioned above, we have undertaken sensitivity analysis on this metric in the form of two scenarios. Both scenarios offset long run membership decline against population growth. In one scenario we adopt the golf membership decline from 2007 and in the other from 2000.

Correcting for Weighting of Golf Membership Towards the Male Over 60 Demographic

The key golfing demographic (over 60 males) is growing in the local authority at a faster rate than the general population growth. The over 60 demographic is increasing in the catchment giving the picture of an aging population.

The average annual growth in over 60 males increases from 3.4% up to 2021 to 3.5% from 2021-2026 before falling back to 2.64% up to 2031.

For each of the scenarios we show on the summary graph golf participation based on the population growth rate in Cherwell district and the faster growth over 60 male demographic. In practise demand will sit between these two levels. We therefore also include a weighted average of the two in each scenario. The calculations of each scenario are set out in the following section.

Calculations

2000 Trend Scenario

The following table shows the projection of participation based on:

- Cherwell District population growth;
- Annual participation decline based on the long run trend back to 2000;

CHERWELL DISTRICT	2016	2021	2026	2031
	Actual	Projection	Projection	Projection
Cherwell Population	148,276	173,281	191,042	202,676
Population Increase		3.17%	1.97%	1.19%
Annual Participation Decline*		-1.64%	-1.64%	-1.64%
Net Movement in Golf Members		1.52%	0.33%	-0.45%
Cherwell Golf Members	2,695	2,907	2,955	2,889
Members per 1000 Population	18.18	16.77	15.47	14.25
Participation rate	1.82%	1.68%	1.55%	1.43%

CBRE DEMAND ASSESSMENT METHODOLOGY

The following table shows the projection of participation based on:

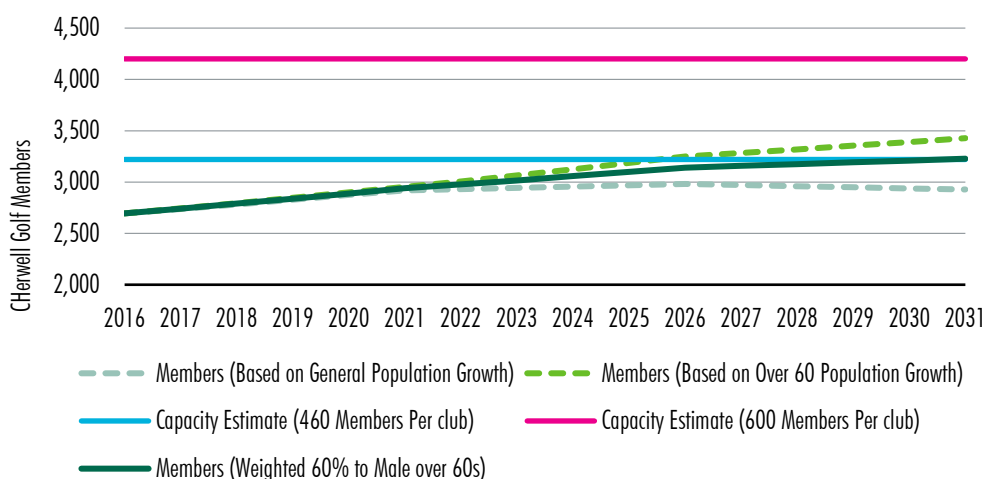
- Cherwell District male over 60 demographic population growth;
- Annual participation decline based on the long run trend back to 2000;

OVER 60	2016	2021	2026	2031
	Actual	Projection	Projection	Projection
Cherwell Population	16,658	19,680	23,373	26,619
Population Increase		3.39%	3.50%	2.64%
Annual Participation Decline*		-1.64%	-1.64%	-1.64%
Net Movement in Golf Members		1.75%	1.86%	0.99%
Cherwell Golf Members	2,695	2,939	3,222	3,386
Members per 1000 Population	18.18	16.96	16.87	16.71
Participation rate	1.82%	1.70%	1.69%	1.67%

The following table shows the calculation of the weighed average allowing for a 60% weighting towards the higher growth rate of the male over 60 demographic.

	2016	2021	2026	2031
Members (Based on General Population Growth)	2,695	2,907	2,955	2,889
Members (Based on Over 60 Population Growth)	2,695	2,939	3,219	3,382
Members (Weighted 60% to Male over 60s)	2,695	2,926	3,113	3,185

Summary Graph – 2000 Trend



CBRE DEMAND ASSESSMENT METHODOLOGY

2007 Trend Scenario

The following table shows the projection of participation based on:

- Cherwell District population growth;
- Annual participation decline based on the long run trend back to 2007;

CHERWELL DISTRICT	2016	2021	2026	2031
	Actual	Projection	Projection	Projection
Cherwell Population	148,276	173,281	191,042	202,676
Population Increase		3.17%	1.97%	1.19%
Annual Participation Decline*		-2.82%	-2.82%	-2.82%
Net Movement in Golf Members		0.35%	-0.85%	-1.63%
Cherwell Golf Members	2,695	2,742	2,629	2,422
Members per 1000 Population	18.18	15.83	13.76	11.95
Participation rate	1.82%	1.58%	1.38%	1.19%

The following table shows the projection of participation based on:

- Cherwell District male over 60 demographic population growth;
- Annual participation decline based on the long run trend back to 2007;

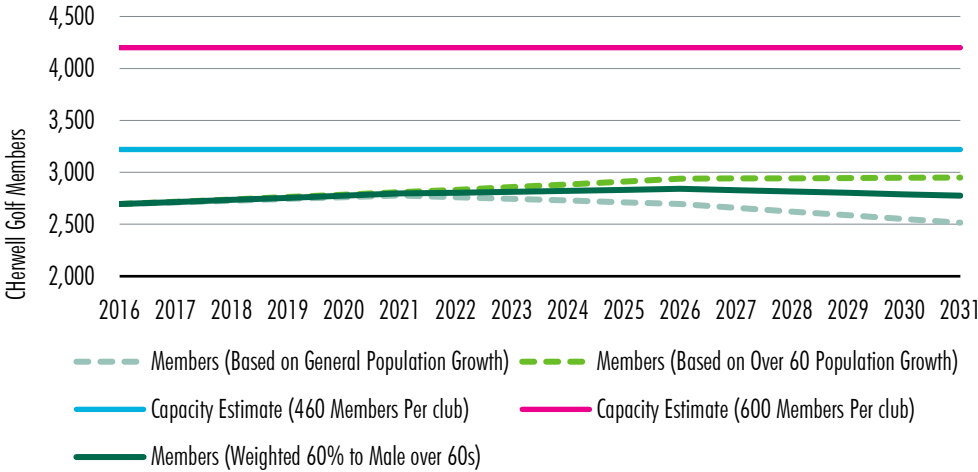
OVER 60	2016	2021	2026	2031
	Actual	Projection	Projection	Projection
Cherwell Population	16,658	19,680	23,373	26,619
Population Increase		3.39%	3.50%	2.64%
Annual Participation Decline*		-2.82%	-2.82%	-2.82%
Net Movement in Golf Members		0.57%	0.68%	-0.18%
Cherwell Golf Members	2,695	2,773	2,869	2,844
Members per 1000 Population	18.18	16.00	15.02	14.03
Participation rate	1.82%	1.60%	1.50%	1.40%

The following table shows the calculation of the weighed average allowing for a 60% weighting towards the higher growth rate of the male over 60 demographic.

	2016	2021	2026	2031
Members (Based on General Population Growth)	2,695	2,742	2,629	2,422
Members (Based on Over 60 Population Growth)	2,695	2,773	2,866	2,840
Members (Weighted 60% to Male over 60s)	2,695	2,761	2,771	2,673

CBRE DEMAND ASSESSMENT METHODOLOGY

Summary Graph – 2007 Trend



APPENDIX 3

SEQUENTIAL ASSESSMENT

This Appendix acts as an extension to Section 6 of this Planning Statement and, in particular, the detailed sequential assessment work sitting behind the ‘Appropriateness of Proposed Use’ subsection.

As identified in Section 6, paragraph 86 of the NPPF requires applications for main town centre uses (as is being proposed here) to be located in centres, then in edge-of-centre locations and then out-of-centre locations. Paragraph 87 adds that when considering edge and out of centre sites, *“preference should be given to accessible sites which are well connected to the Town Centre”*. The application of the sequential test is consistent between the NPPF and CLP1 policy SLE2.

PPG is clear that *“the sequential test should recognise that certain main town centre uses have particular market and locational requirements which mean that they may only be accommodated in specific locations”* (Paragraph: 012 Reference ID: 2b-012-20190722) and this is bolstered by a series of case law decisions, notably, *Tesco Stores v Dundee* [2012] UKSC 13, and *R (Zurich Assurance Ltd t/a Threadneedle Property Investments) v North Lincolnshire Council* [2012] EWHC 3708 (Admin). This establishes that specific operational and business requirements should be factored in as part of the application of the sequential test.

As set out in Section 6, the Applicant is looking to open its first Great Wolf Lodge in the UK (and outside of North America) and as part of a thorough exercise to consider this opportunity they have honed in on a socio-economically-driven area of search – this being in this part of Central England – and as part of the site selection process, they have needed to consider their specific operational requirements. These considerations are relevant in terms of the application of the sequential test, both the area of search (and town centres to be considered) and the requirements on potential other sites to accommodate the Proposed Development.

It is not considered appropriate to disaggregate the proposed resort into its constituent components on the basis that they are all core parts of the Great Wolf Lodge experience and could and would not exist in isolation from one another.

The Applicant’s specific requirements are set out in Section 7 and repeated below for clarity:

- Located 90 minutes drive time from London and Birmingham
- Approximately 12ha with a relatively level topography
- Reasonably well concealed with no nearby sensitive receptors
- Proximity to and ability to connect to public transport infrastructure
- Main road proximity and visibility and ease of access

- M40 corridor location
- Proximity (30 minutes drive time) to population of 30,000 plus providing local workforce

Even though the NPPF and PPG would probably require an assessment of other sites using the above, the Applicant has demonstrated a high degree of flexibility and for the purposes of this sequential assessment, the below relaxed requirements / criteria have been considered.

- Located 120 minutes drive time from London and Birmingham
(30% further than the Applicant's identified viable catchments)
- Approximately 6ha with a relatively level topography
(50% of the Applicant's requirement, needing decked car parking and hotel, neither are viable)
- Not necessarily concealed with no consideration for nearby sensitive receptors nearby
(for the assessment to consider these for each site)
- Proximity to and ability to connect to public transport infrastructure
(inappropriate to apply flexibility to this point)
- Main road proximity / visibility and ease of access
(inappropriate to apply flexibility to this point)
- Not focused on M40 corridor location
(overlooking the Applicant's initial investigation into the UK identifying this route)
- Proximity to population of 30,000 plus providing local workforce
(inappropriate to apply flexibility to this point)

This appendix now considers in, edge and out of town centre sites in a series of towns chosen based on the above business and operational requirements. Sites within these towns (in, on the edge of and out of the defined town centres) have been selected following a detailed review of the relevant Development Plan document(s) and identification of allocated sites, as well as from a review of recent applications that have similarly required a sequential assessment. The towns considered as part of the sequential assessment to follow are listed below, and considered in turn.

- Abingdon (Vale of White Horse District Council)
- Aylesbury (Aylesbury Vale District Council)
- Banbury (Cherwell District Council)
- Bicester (Cherwell District Council)
- Buckingham (Aylesbury Vale District Council)

- Leighton Buzzard (Central Bedfordshire Council)
- Milton Keynes (Milton Keynes Council)
- Newport Pagnell (Milton Keynes Council)
- Oxford (Oxford City Council)
- Towcester (South Northamptonshire Council)

Abingdon (Vale of White Horse District Council)

North West Abingdon-on-Thames

The site allocation (December 2016 Local Plan), at 12.6ha, is large enough for the Proposed Development and purely from a size point of view, it is considered to be viable. The site is not believed to be available for development and it is noted that the allocation identifies this as a residential site to deliver circa 200 new homes making it unsuitable. Like the application site, it is assumed that measures can be taken to turn this site into a sustainable site in terms of promoting non-car travel for guests and staff, although Abingdon is not as well served by mainline trains as Bicester. Notwithstanding the above, the site is not located within the identified town centre and in theory offers no better alternative than the application site, even if this area was attractive to the Applicant.

North of Abingdon-on-Thames

The strategic site is not understood to be available, even in part, and is identified for substantial housing development (800 homes) along with a new primary school and other community uses as part of a major urban extension. It is not considered to be suitable therefore. The size of the allocation, at 50.65ha, is large enough to viably accommodate the Proposed Development although it is also out of town and is no more accessible (to Abingdon town centre) than the application site is (to Bicester town centre). Moreover, train links to Abingdon are not as good as to Bicester and therefore the ability to promote non-car trips are relatively compromised.

Abingdon Town Centre

We are not aware of any available sites within or on the edge of the town centre that are available that come close to the flexible 6ha site requirement of the Applicant.

Aylesbury (Aylesbury Vale District Council)

South Aylesbury

The overall 95 ha site allocation (Draft December 2017 Local Plan) is large enough to viably deliver the Proposed Development. It is allocated for housing – 1,000 new homes – as well as a new school, local

facilities and highways infrastructure. It is therefore not considered to represent a suitable site for the Proposed Development and is not considered to be available (with some parts already benefitting from planning permission). Importantly the site is located in an out of centre location and therefore not sequentially preferable.

South West Aylesbury

Like the South Aylesbury allocation the wider site is large enough (at over 112 ha) to accommodate the Proposed Development but is earmarked for over 1,500 new homes (some of which benefit from planning permission). It is considered a viable option in terms of its size but not suitable (based on the housing requirements it provides) or available. It is also in an out of centre location which is not sequentially preferable.

Aylesbury North of A41

The 250 ha site it allocated for almost 1,700 new homes, new employment land (B1 / B2 / B8 uses) and other uses. Owing to its size it is considered a viable option and based on the land uses could be considered suitable. It is not available (and is the subject of recent and current planning applications). Importantly the site is not located within the town centre and is not sequentially preferable to the application site in terms of its location and accessibility.

Aylesbury South of A41

This 225 ha site is large enough to accommodate the Proposed Development although it is allocated for housing (3,111 new homes) and employment uses (6.9 ha) as well as new schools and a local centre. The site is not considered to be suitable based on these allocated uses and is not available. It is located in an edge of centre location and is therefore arguably not sequentially preferable to the application site.

Berryfields

The site is allocated for employment uses and a new district centre, acting as a second phase to the already consented and part developed housing scheme. The site is located outside of Aylesbury in an out centre and despite its potential viability and suitability it is not considered to be available and owing to its location it is not sequentially preferable.

Kingsbrook

Another major urban extension allocation of over 300 ha, the site is allocated for 2,450 new homes, 10ha of employment space, new schools and other community uses and new road infrastructure. The site benefits from a series of outline and detailed permissions and is not available nor suitable (based on the allocated uses). It is located in an out of centre location as well and therefore not sequentially preferable to the application site.

Ardenham Lane, Aylesbury

At 2 ha, this edge of centre site is not large enough to accommodate the Proposed Development even with the high degree of flexibility shown. It is allocated for housing (70 new homes) being within a residential edge of town centre location. It is not considered be available, suitable or viable therefore.

Land North of Manor Hospital, Blerton Road

The 1.7 ha site is too small to accommodate the Proposed Development even applying the flexibility set out earlier. The site is allocated for housing and has a recent residential permission – it is therefore not considered to be suitable, viable or available for the Proposed Development.

Rabans Lane

At 6.6 ha this site is considered to be large enough for the Proposed Development when applying the high degree of flexibility summarised previously. The site is allocated for housing (200 new homes). It is identified as being a constrained site next to the railway line. The site is not available and, importantly, is not located in the town centre and is not considered to be sequentially preferable to the application site.

Aylesbury Town Centre

Other specific allocated sites in (or on the edge) of the centre are considered to be too small for the Proposed Development and are not believed to be available in any event. This includes the following allocations: Land at Thame Road / Leach Road; PO sorting office, Cambridge Road; Land at junction of Buckingham Street and New Street; Oaklands Hostel, Blerton Road; and Hampden House. The emerging Local Plan identifies parts of the town centre for comprehensive redevelopment albeit there are no available, suitable or considered to be viable sites in this area.

Banbury (Cherwell District Council)

Banbury Canalside

The 26 ha allocated site (2015 CLP1) is large enough to accommodate the Proposed Development. It is identified as an important mixed use site delivering new homes, retail, office and leisure uses. It is not available and the subject of current development, with work having started on site in summer 2019.

Hardwick Farm, Southam Road

The site, at 32 ha, can accommodate the Proposed Development. It is located in a sustainable edge of centre location although it is allocated for housing (600 new homes) and other community uses. It is the subject of a planning application and is therefore unsuitable and unavailable.

West of Bretch Hill

The 26.5 ha site is large enough to accommodate the Proposed Development. It is allocated for housing and is the subject of a planning application for this use. It is not considered to be available or suitable and is located in an out of centre location which is not considered to represent a sequentially preferable opportunity.

Bankside Phase 2

The 27 ha site is large enough to accommodate the Proposed Development. It is allocated to deliver new homes (600) as part of Phase 1 to the wider Bankside development. The site is therefore not considered to be suitable and is not available. It is located in an out of centre location that is not sequentially preferable to the application site.

North of Hanwell Fields

The site is large enough to accommodate the Proposed Development. It is not available nor suitable, coming forward as a housing development. Moreover it is located in an out of centre location and is therefore not sequentially preferable to the application site.

Employment Land West of M40

The large (35 ha) site is physically large enough to accommodate the Proposed Development. It is however allocated for employment uses and is the subject of emerging plans for a logistics centre. As well as being unavailable and unsuitable, it is located in an out of centre location and therefore not sequentially preferable to the application site.

Banbury Town Centre

Other sites in (or on the edge) of the centre are considered to be too small to be considered suitable or viable for the Proposed Development and are not believed to be available in any event.

Bicester (Cherwell District Council)

Bicester Sports Association, Oxford Road

The circa 5ha site is considered to be too small and therefore not viable for the Proposed Development even applying the very generous degree of flexibility outlined previously (which would in any event be unviable). Owing to these physical constraints and the potential important masterplanning function of the site for Bicester town centre, the site is not suitable for the Proposed Development. It is also not currently or due to become available.

Bicester Business Park (Bicester Office Park)

The site is physically large enough to accommodate the Proposed Development. It is located in an out of centre location although it is acknowledged as being more accessible than the application site. It is allocated for new employment uses and is subject to a planning application which is due to be consented (currently subject to s106 being signed). The site is therefore not available for development and, considering the allocated / planned uses, is not considered to be suitable.

Former RAF Bicester

The site is large enough to accommodate the Proposed Development. Whilst located in an out of centre it is agreed that is more accessible to the town centre than the application site. The site is not available however, being the subject of ongoing development (and recent applications) and other parts being allocated for employment uses as well, making it unsuitable.

Bicester Town Centre

Other sites in (or on the edge) of the centre are considered to be too small to be considered suitable or viable for the Proposed Development and are not believed to be available in any event.

Buckingham (Aylesbury Vale District Council)

Moreton Road, Buckingham

This 14.9 ha site is large enough to accommodate the Proposed Development. It is allocated for new homes (130) and new sports and recreation space making it unsuitable for the Proposed Development. The site is not available and, importantly, is located in an out of centre and not considered to be sequentially preferable to the application site.

West Buckingham (land bounded by Brackley Road and River Great Ouse)

At 20 ha, the site could accommodate the Proposed Development. It is allocated for housing (300 new homes) and is therefore not suitable for the Proposed Development. It is also not available. The site is located in an out of centre location to the eastern of Buckingham and is therefore not a sequentially preferable site in or on the edge of the town centre.

Land off Osler Way

The site is almost 26 ha and is therefore large enough to accommodate the Proposed Development. It is allocated for 420 new homes and is not considered suitable for the Proposed Development. It is not available and it is located in an out of centre location, making it no better located in terms of the sequential assessment requirements.

Buckingham Town Centre

Other sites in (or on the edge) of the centre are considered to be too small to be considered suitable or viable for the Proposed Development and are not believed to be available in any event.

Leighton Buzzard (Central Bedfordshire Council)

Bridge Meadow

The 5.6 ha site is considered to be too small to accommodate the Proposed Development, being smaller than then 6 ha that already applies considerable flexibility to the Applicant's site requirements. It is therefore not suitable or viable. The suitability of the site is also affected by the aspirations for it to enhance the adjacent town centre. The site as a whole is also not considered to be available.

Land South of High Street

The site is located within Leighton Buzzard town centre but is too small to accommodate the Proposed Development. It is also heavily compromised by its shape and position running along the rear of existing small scale town centre shops and properties. It is not considered to be suitable or viable for the Proposed Development and it is not available as a site.

Leighton Buzzard Town Centre

Other sites in (or on the edge) of the centre are considered to be too small to be considered suitable or viable for the Proposed Development and are not believed to be available in any event.

Milton Keynes (Milton Keynes Council)

Eastern Area Expansion

The large allocation (over 300 ha) is identified for a mix of housing, employment and community uses (including new schools, parks and local centre) making it unsuitable. Parts of the site are not available for redevelopment. Moreover, the site is located in an out of centre location and therefore not sequentially preferable.

Western Area Expansion

The circa 250 ha allocation is identified for future housing and employment uses and new primary and secondary schools. It is therefore not considered to be suitable for the Proposed Development. The site is not available and is also located in an out of centre location making it sequentially no better than the application site.

South East Milton Keynes Urban Extension

The site is large enough for the Proposed Development being allocated for approximately 3,000 new homes alongside supporting community uses. The allocated uses make the site unsuitable for the Proposed Development. The site is also not available and, in any event, it is out of centre.

Milton Keynes East Strategic Urban Extension

The allocation is large enough to accommodate the Proposed Development. The allocation identifies that it should deliver 5,000 new homes as well as significant employment uses and other services / community uses. The Proposed Development is considered to be a suitable use as part of the urban extension. It is however not available and it is also in an out of centre location, meaning that it is not sequentially preferable to the application site.

Land at Eaton Leys, Little Brickhill

The allocation is large enough to accommodate the Proposed Development, being allocated for up to 600 new homes as well as a new local centre, health centre and primary school. The allocated uses make the site unsuitable for the Proposed Development and in any event the site is not available. The site is located in an out of centre location that is not sequentially preferable to the Proposed Development.

Strategic Employment Sites

There are a series of strategic employment sites around the outside of Milton Keynes and these, whilst being substantial in size, are not suitable for the Proposed Development on the basis of their important employment uses role providing B Class employment land. We are not aware of any of these sites being available either.

Milton Keynes Town Centre

Other sites in (or on the edge) of the centre are considered to be too small to be considered suitable or viable for the Proposed Development and are not believed to be available in any event.

Newport Pagnell (Milton Keynes Council)

Newport Pagnell Town Centre

There are no sites in (or on the edge) of the centre that are considered to be suitably or viably large enough to accommodate the Proposed Development and none are not believed to be available in any event.

Oxford (Oxford City Council)

Osney Mead

The 17.4 ha edge of centre site is capable of accommodating the Proposed Development in terms of its size (albeit there are other physical constraints relating to the site). It is an existing industrial estate and allocated for a mix of uses including housing, student accommodation and employment uses and not for “any other uses”. It is therefore not considered to be suitable for the Proposed Development, nor is it available.

Cowley District Centre

At 3.65 ha the site is considered to be too small for the Proposed Development even factoring in the flexibility demonstrated through this assessment. The site is therefore not suitable or viable and it is also not believed to be available.

Blackbird Leys District Centre

The site is 8.10 ha and is therefore considered large enough to accommodate the Proposed Development if flexibility is shown, despite the viability issues associated with this. It is allocated to continue to provide district centre uses and services, which arguably the Proposed Development

would not. It is therefore not considered to be suitable. It is also not available as a development opportunity.

Unipart

The 30.63 ha site is large enough to accommodate the Proposed Development. It is allocated for employment land (B1 – B8 uses) and is therefore not considered to be suitable for the Proposed Development. It is also not available. The site is located on the south west edge of Oxford and is therefore not considered to be sequentially preferable to the Proposed Development.

Oxford BMW Mini Plant

The site is almost 70 ha in size and is therefore able to physically accommodate the Proposed Development. It is allocated for employment uses and is therefore not suitable. Like the Unipart site it is on the edge of Oxford in an out of centre location that is not sequentially preferable to the application site.

Oxford Science Park (Littlemore & Minchery Farm)

The site is large enough to accommodate the Proposed Development. It is classed as a Category 1 employment site however and is therefore unsuitable for the Proposed Development. It is also not considered to be available. The site is located to the south of Oxford, in an out of centre location, that is not sequentially preferable to the application site.

Oxford Business Park

The site at 5.15 ha is too small to accommodate the Proposed Development and it is therefore not a viable opportunity. It is also allocated for employment uses making it unsuitable. Finally, it is not available for development.

Kassam Stadium, Grenoble Road

The site is in total (both plots) about 9 ha in size and is therefore capable of accommodating the Proposed Development when applying flexibility. It is allocated for housing and public open space and is therefore not considered to be suitable for the Proposed Development. The site is also not available and in an out of centre location (meaning it is not sequentially preferable).

Headington Hill Hall and Clive Booth Student Village

The site is 10 ha and therefore capable of accommodating the Proposed Development when applying flexibility to the Applicant's requirements. Saying that, there are a number of other site constraints including the adjacent Conservation Areas. The site is specifically allocated for academic uses (both educational and ancillary sports / leisure uses) making it unsuitable for the Proposed Development. The site is not available for development either.

Churchill Hospital Site

At almost 23 ha the site can accommodate the Proposed Development. It is allocated for employment uses as well as educational, academic and health care uses however meaning that it is not suitable for the Proposed Development. In addition, the site is not available. The site is located to the east of Oxford and in an out of centre location meaning it is not sequentially preferable to the application site.

Nuffield Orthopedic Centre

The site is 8.37 ha in size and is therefore consider to be capable of accommodating the Proposed Development when applying a degree of flexibility. The allocation relates to further healthcare facilities and medical research only and it is therefore not suitable for the Proposed Development. It is also not considered to be available. The site is located to the east of Oxford and in an out of centre location meaning it is not sequentially preferable to the application site.

Old Road Campus

At 6.41 ha the site is just capable of accommodating the Proposed Development when applying a high degree of flexibility to the Applicant's site requirements. It is allocated for medical teaching and research uses meaning that it is not suitable for the Proposed Development. It is also not available. The site is located to the east of Oxford and in an out of centre location meaning it is not sequentially preferable to the application site.

Warneford Hospital

The site is 8.78 ha in size and is therefore consider to be capable of accommodating the Proposed Development when applying a degree of flexibility. The allocation relates to healthcare related facilities and it is therefore not suitable for the Proposed Development. It is also not considered to be available. The site is located to the east of Oxford and in an out of centre location meaning it is not sequentially preferable to the application site.

John Radcliffe Hospital Site

The site is almost 28 ha in size and is therefore capable of accommodating the Proposed Development. It is allocated for employment uses and health and education floorspace, making it unsuitable for the Proposed Development. The site is also not considered to be available. The site is located to the east of Oxford and in an out of centre location meaning it is not sequentially preferable to the application site.

University of Oxford Science Area and Keble Road Triangle

The 12.4 ha site within Oxford City Centre is capable of accommodating the Proposed Development. It is allocated for academic institutional uses and associated research accommodation with the allocation referring to a number of listed buildings on site that should be retained. The site is therefore not suitable for the Proposed Development. In addition, the site is not considered to be available.

Oxford City Centre

There are no sites in (or on the edge) of the centre that are considered to be suitably or viably large enough to accommodate the Proposed Development and none are not believed to be available in any event.

Towcester (South Northamptonshire Council)

Moat Lane Regeneration Area

The full extent of the regeneration area could arguably accommodate the Proposed Development. The area is dominated by its context in and on the edge of the town centre, with a number of heritage assets and limited landscape cover that would mitigate any visual effects of development of the scale as is being proposed. The site is allocated for housing and retail uses (supporting the town centre) and therefore not considered to be suitable for the Proposed Development. The allocation has been subject to piecemeal applications and is not considered to be available for Proposed Development.

Towcester Racecourse

The racecourse site is considered to be suitable and viable in terms of its physical size. There are a number of significant site constraints however (topography, heritage, visibility) that make it unsuitable and unviable as a development opportunity. The site is currently allocated for intensified leisure uses. The site is understood to now be available (or at least is likely to become available) following the racecourse ceasing to operate in early October 2019. The site is located in an edge of centre location and is arguably not sequentially preferable to the application site in planning terms.

Towcester Town Centre

Other sites in (or on the edge) of the centre are considered to be too small to be considered suitable for the Proposed Development and are not believed to be available in any event.