

DP4819

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FAO Clare Whitehead
Place and Growth Directorate
Cherwell District Council
Bodicote House
Bodicote, Banbury
Oxfordshire
OX15 4AA

DP9 Ltd
100 Pall Mall
London SW1Y 5NQ

Registered No. 05092507

telephone 020 7004 1700

facsimile 020 7004 1790

www.dp9.co.uk

BY EMAIL

Dear Ms Whitehead,

**PROPOSED GREAT WOLF LODGE, LAND TO THE EAST OF M40 AND SOUTH OF A4095, CHESTERTON, BICESTER.
CDC REFERENCE: 19/02550/F**

Following the receipt of the Chesterton Parish Council ('CPC') response dated 29 January 2020, we provide the below response to the specific concerns and objections raised with the planning application for a proposed Great Wolf Lode indoor waterpark and hotel ('the proposed development'). Noting the overlap in the nature of the points raised by CPC and other Town and Parish Councils (some of which are cited as supporting the CPC comments), as well as individuals' responses, this letter seeks to address all of these matters together. We acknowledge and appreciate the approach taken by CPC and by Carter Jonas in the review of the extensive planning application material and we seek to address the questions and concerns raised through this response letter to Cherwell District Council ('CDC'). For ease, this letter refers to the paragraph numbers in Carter Jonas' letter and appendices / annexes, where possible.

Introduction / Background

Carter Jonas' report at paragraph 1.4 that *"the proposal site is well beyond the urban edge of Bicester and the village of Chesterton. It is in the open countryside where the prevailing character is of open countryside and the landscaped 'Bignell Park' to the north"*. The Planning Statement supporting the planning application acknowledges the position that the site is outside of the defined settlement of Chesterton and therefore in the 'open countryside'. Important context is then provided in the Planning Statement, including the site's location outside of the green belt, adjacent to the M40, on the edge of Bicester (in a wider contextual description) and not within the protected buffer between the east of Chesterton and west of Bicester (Planning Statement paragraphs 6.41 to 6.47, in particular).

At paraps 1.8 to 1.10, Carter Jonas refer to two nearby appeal decisions noting their relevance in terms of the proposed development. The February 2016 dismissed appeal on land north of Green Lane and east of The Hale is referenced in terms of the character of the area and the visual harm caused by the development; suggesting that the proposed Great Wolf Lodge site is comparable. Whilst Carter Jonas refer to paragraphs 30 onwards they fail to present the clear context that the Inspector establishes in paragraph 29 of their report, that *"the site ... [is] clearly visually part of the countryside. It is typical in character of the flat landscape which surrounds the village. Because of its open nature it provides a rural and agricultural setting to the village, forming a rural foreground to views from The Hale, over what is at present an open boundary with very little boundary planting to obstruct views. Even when the development of The Paddocks has taken place, it would continue if undeveloped to provide a rural setting to the village"* (our emphasis added). As you will note from the Landscape Visual Impact



Assessment work completed as part of the Great Wolf Lodge application, the site is very different to this appeal site which was a very visible infill of an open site that's openness was important in terms of the rural context. CDC's landscape officer has reviewed the proposed Great Wolf Lodge application and has concluded that, *"the LVIA is a comprehensive and competently written document that complies with GLVIA 3 guidelines. ... In my opinion the site has low landscape sensitivity to change"*. This is a very different context to The Hale appeal referenced by Carter Jonas.

Considering the September 2006 appeal, this is referenced in relation to the level of access to the site (ie is it a sustainable location) and also the Appellant's lack of information relating to demonstrating compliance with the need and sequential tests. In terms of sustainability, reference is made to *"limited public transport services in Chesterton and the absence of roads with continuous footways linking the appeal site to the village"*. These are specifically two things that the proposed development addresses and would be secured by way of Section 106 agreement. In terms of the need and sequential test, Carter Jonas will be aware that 'need' is no longer a planning test (as it was in 2006, during this appeal) and that a sequential assessment has been undertaken and shared as part of the planning application for the proposed development. It seems therefore that this appeal decision actually endorses the approach taken in the Great Wolf Lodge application.

Turning to Carter Jonas' points in Section 3.0 of their letter, we question why the extent of the loss of golf course is question with the insertion of *"(at least)"* at paragraph 3.1. It should be clear from the material submitted – both the plans and technical documents – that the application relates solely to 9 of 18 holes and that the remaining holes, hotel and wider leisure facilities are left intact and will continue to operate. If this is misunderstood by Carter Jonas and CPC, then hopefully this clarifies things. There are comments made later in Carter Jonas' letter which suggest that more than just 9 holes will be lost; and we can confirm that this is categorically untrue.

Sustainable Location

Referring to paragraph 3.2, we acknowledge Carter Jonas' comments about the definition of what is a 'sustainable location' and we agree that there is no clear definition in the development plan. Indeed, we acknowledge this in our Planning Statement (paragraph 6.37). In terms of Strategic Objective 12, the proposed development is robustly assessed through the application material in terms of conserving the countryside and landscape and particularly the setting of Chesterton. Considering the related comments at paragraph 3.3, we agree that the application material references the site being on the edge of a growth settlement (which is true), but clarify that in so doing it does not ignore Chesterton, or subsume it within Bicester. Indeed, the policy test of Policy SLE3 is not overlooked and the Planning Statement clearly makes the point that the distinction of Bicester and Chesterton as settlements is not harmed, owing to the location of the application site on the western edge of Chesterton abutting the M40 and not the eastern side of the village.

We note and concur with Carter Jonas' point at paragraph 3.4 that the proposed development does not 'totally replace' the existing commercial use (i.e. the whole golf course and hotel). The policy (published 24 years ago) does recognise that any such hotel development outside of a settlement will need to be considered on its merits and specific points considered and Carter Jonas' very literal interpretation of compliance with this policy is not considered to be appropriate when considered against the development plan as a whole (and other policies supporting appropriate growth) and the NPPF. On a related point, Carter Jonas, at paragraph 3.5, differentiate between different commercial uses, comparing a golf course and, the example given, an industrial shed. We agree with this point that there are different types of commercial uses (in terms of visual impact for example) which is why a detailed review of the landscape impact of the proposed development has been undertaken as part of the thorough planning policy assessment.



Transport

In terms of the 'transport impact' section of the Carter Jonas letter, a technical note prepared by Motion, as the Applicant's transport consultants, is appended to this response letter. This responds to the detailed comments made by Paul Basham Associates ('PBA') and summarised in the Carter Jonas letter at paragraphs 3.6 to 3.15. The following headlines from Motion's review are summarised below:

- The PBA work refers to the design of the proposed site access junction. The junction has been designed with reference to the Design Manual for Roads and Bridges and scaled plans were provided as part of the Transport Assessment which allow geometries of the junction to be measured. Oxfordshire County Council ('OCC') officers have reviewed the design of the site access junction and are satisfied with the layout proposed. It is not a requirement of OCC to provide a road safety audit at the planning stage and OCC have not requested an audit. However, Motion have confirmed that this could be prepared if it is considered beneficial. The Transport Assessment includes junction capacity modelling based on the proposed geometries and this demonstrates that the junction will operate within capacity during all peak periods and the proposed right turning lane is sufficient to accommodate vehicle turning right into the site and there would be negligible queuing or vehicle delay.
- The PBA work also suggests that plans of highway works lack detail of corduroy paving (tactile paving). This is incorrect as Drawings 1803047-02 and 1803047-03, show the detail of tactile paving on the proposed footway route from the site in to Chesterton village. Full details of all tactile paving and dropped kerbs etc. would be provided at the detailed design stage. It is also noted that OCC have raised no concern in this regard.
- PBA suggest that the existing Public Right of Way ('PRoW') is well used by local residents but provides no evidence to justify this. Motion have collected survey data which demonstrated that all users of the PRoW were associated with the hotel, either staff or visitors and this is set out in the appended Technical Note.
- PBA also suggest that it is unclear whether the trip analysis gives consideration to the usage of the conference facilities. The Transport Assessment details that the surveys of existing Great Wolf Lodge facilities utilised for trip comparison purposes have comparable conference facilities. This has been discussed with OCC at length during pre-application discussions and their formal consultation response confirms that OCC have no concerns in this regard.
- PBA state that CPC have concerns about the extent to which committed developments have been included within the assessment, albeit without noting any specific concerns. The assessment has been based on data from the Bicester Transport Model ('BTM'), maintained by OCC and includes consideration of traffic associated with planned and committed developments in Bicester and the immediate area. In addition to the data from the BTM, the assessment has also made consideration of further developments which are not included within the BTM such as Heyford Park Phase 2, BSA facilities on Akeman Street, Chesterton and the expansion of the Bicester Hotel Golf and Spa. The assessment of committed developments is considered robust and has been agreed with both CDC and OCC officers as part of extensive pre-application discussions and a formal EIA scoping process.

Landscape, Built Environment and Heritage

Referring to Annex 2 prepared by Applied Landscape Design Limited ('ALD'), BMD have prepared a detailed response that is appended to this letter. In short, and of most importance is that significant work has been done



with CDC landscape officers during pre-application meetings and this has included a detailed scoping of methodology and viewpoint locations. This approach has also been captured through the formal EIA Scoping process. CDC's landscape officer recognises that the LVIA is "*a comprehensive and competently written document*" (referring to their written response of 28 January 2020).

ALD's headline comment at paragraph 2.2 that "*the sheer size and massing of the proposed development means it does not comply with ... Policy ESD13*" is also strongly contested. The LVIA and supporting landscape proposals demonstrate that appropriate mitigation can be provided to remove any significant effects on the landscape and views. The LVIA demonstrates that the influence of the development would be to the site itself and its immediate environs, with limited or no influence to the wider landscape and views in the direction of the site. Similarly, there would be no undue harm on the setting of settlements or any landscapes of historic value, including the nearby Conservation Area. The comments made by CPC and the Bicester Local History Society are therefore refuted.

Natural Environment

Considering the comments made at 3.16, Carter Jonas report that CPC would like the existing biodiversity value to be reassessed. There is no technical rationale for this in terms of challenging the work done and submitted with the application. As you are aware, baseline habitat data collection and assessment was undertaken in a thorough manner, by botanically qualified ecologists. A habitat survey was undertaken in January 2018 following industry-accepted Joint Nature Conservation Committee (JNCC) Phase 1 methodology. This was subsequently updated by a botanical walkover in August 2018 to verify findings. As detailed in Chapter 9 of the Environmental Statement ('ES') prepared by WSP, this was "*conducted by a competent botanist, during the peak flowering season. This provided an update to the botanical lists gathered within the Phase 1 habitat report and allowed mapped habitats to be reassessed and remapped as appropriate*". Both survey methods and data are described in Appendix 9.1 of the ES. We can confirm that these surveys took account of the rough areas alongside.

Responding to criticism in the Carter Jonas letter (and also those of CPRE), the Biodiversity Net Gain ('BNG') calculation uses appropriate distinctiveness and condition scores to reflect habitat value that could be lost. For example, semi-improved neutral grassland was assigned Medium distinctiveness over the poor semi-improved grassland that was assigned Low distinctiveness (see Appendix 9.10 of the ES). It is an accurate reflection of baseline conditions that the majority of habitats are considered to be of poor condition given the intensive management (including mowing and fertilizer application) and recent origin of habitats present at the site. The rough areas located in the development area are in the main subject to heavy management and were observed to exhibit low species diversity and relatively low sward height. They are not considered to have any significant semi-natural character in terms of species composition, rather representing grassland of slightly taller height than the greens, but with similar low species diversity. The layout of the proposed development will retain or enhance the areas of highest value habitat, centred around the north-east of the site, including the network of waterbodies (the most ecologically valuable on the site, as demonstrated by the PSYM survey, Appendix 9.8 of the ES). The landscape plan and sensitive future management (see HMMP appendix 9.11 of the ES) will overall deliver habitats of higher value than those which will be lost to the proposed development, and will be secured by way of planning conditions and obligations.

Importantly, CDC Ecology Officers have reviewed and agreed the scope of work undertaken and the assessment criteria and the detailed baseline work completed and do not object to the proposals. Similarly, Natural England have reviewed the submitted application material in detail and do not object



Drainage and Flood Risk

Referring to paragraphs 3.17 and 3.18 of the Carter Jonas letter, we can confirm that the proposed site discharge is at greenfield rates (QBar). This means that water emanating from the site is restricted to that of an undeveloped site. However, the existing site benefits from some drainage in the form of ditches and perforated pipes and it therefore does not behave as an undeveloped greenfield site. Importantly and as discussed with OCC, the proposed rates will offer a betterment on the existing. The hardstanding will amend the speed that water enters the below ground system, but the attenuation and flow control will limit the rate it leaves the site. OCC as the Lead Local Flood Authority have not raised a formal objection in response to the planning application, and additional material has been provided responding to the questions that have been raised.

In terms of water supply, the efficiency measures inherent to the proposed development are set out in the application documents. Moreover, the Applicant have engaged with Thames Water during the pre-application stage to agree that there is sufficient network capacity, reflecting the nature of land use and acknowledging the efficiency of equipment to be installed and used in the operation of the proposed development. A response from Thames Water is expected before planning committee.

Golfing Facilities

Considering the loss of golfing facilities (Carter Jonas letter paragraph 3.20), we reiterate that when taken as a whole there is not a net loss when it comes to *“health and wellbeing ... [or an] active engagement in sport”*. We acknowledge that the golf course is proposed to reduce from an 18-hole course to a 9-hole course, but this is consistent with the level of golf membership at the site which has continued to decline (in line with national trends). As such, the proposed 9-hole course would be expected to encourage an increase in those playing golf. In addition, and referring to the comments on health and wellbeing and engagement in sport, the proposed development relates to an indoor waterpark for families and a new public open space; both of which will provide greater leisure and amenity opportunities to more people.

We appreciate the comments made in Annex E to the Carter Jonas letter (and the review of golf prepared by CPC) regarding the level of engagement and that the CPC were unaware of the viability of the golf course. As you will be aware, the Applicant has undertaken extensive public engagement prior to the submission of the application and whilst the comments from CPC suggest that they would have wanted more information on the future of the golf course, this is not in the Applicant's gift to do so (not being the owner of the wider Bicester Hotel Golf and Spa ('BHGS')). We refute the comments that the proposed development *“will likely only bring further issues to his [BHGS owner] current businesses”*, as we would expect these to be unaffected by the proposed development – citing the growth in 9-hole golf, and the complimentary nature of the proposed development and the leisure offer on the BHGS site.

Regarding the golf viability questions raised by CPC and the reported growth in 'other segments', namely incomes from outside of standard 18-hole memberships, those income streams will remain and arguably can be strengthened with financial investment in improving the 9-holes to be retained. Referring to the 9 holes vs 18 holes comments, the point made by CBRE and also in the Planning Statement (main body of the report) is that it is not viable to retain 18 holes. It goes without saying that the costs of maintaining an 18-hole course are greater than maintaining a 9-hole course and a decline in members (in whatever format) will present BHGS with financial viability issues. If there are fewer and fewer 18-hole playing members, then it is logical that the maintenance and continued use of 18-holes be looked at in terms of viability (this is why this point is made throughout the planning application).



Considering the statement by CPC that *“the need for golf facilities in the area should be scrutinised thoroughly by Cherwell District Council, as the loss of such an important sports facility should not be determined lightly”*, we agree and have asked CDC’s leisure and recreation team to do this, as a supplement to their initial response which did not consider the CBRE work, but rather their own, older evidence base sitting behind the emerging Local Plan.

Considering the golf participation tables and the suggestion that CBRE sought to mislead by not showing 2019 data, this was not intended. As this information is available now we are happy to reference this. As set out in the CBRE work and their conclusions this refers to trends and whilst there is a slight increase 2018 to 2019 (as there was 2016 to 2017 as well) the general trend is still downwards. In a similar vein and regarding the local golf provision map and table, we accept that there seems to have been a formatting error between the two in the CBRE report. However, the locations are correct and therefore the overall conclusions in CBRE’s report are still valid.

Considering the closing remarks of the CPC review, *“whilst the Parish Council is of the view this is an inappropriate development in an unsustainable location and should not be approved, we would have expected, as a very minimum, the applicant to have included a detailed investment plan to improve the provision of the front 9 holes as part of this planning application”*. As part of ongoing discussions between CDC and the Applicant, a Section 106 package of works to invest in the retained BHGS 9-hole course is now being offered, acknowledging that the proposed development results in a loss of part of the existing golf course.

Employment Need

Referring to Carter Jonas’ comments on employment need (section 4.0), it should be recognised that where the Local Plan talks of ‘employment land supply’ this is different to job-creating commercial development (i.e. in the leisure, tourist or retail sectors). We appreciate that there is a strategic vision to locate employment uses alongside housing and that the emphasis here is on locating employment in sustainable locations. The specifics of the location of the application site is recognised by the Applicant and it is therefore understood that this is not part of a wider allocation where housing is also proposed. The proposed development does however deliver significant public transport (and non-car means of transport) improvements, including a free-to-use shuttle bus service and cycle and footway enhancements. This is with the clear intent to reinforce the site’s sustainability and to facilitate movement between the site (as an employment generator) and the existing and growing residential population. In terms of getting Great Wolf Lodge staff to and from the application site, this is addressed through these measures and will be reinforced through a staff travel plan encouraging this, all of which will be secured through planning obligations.

The CPC / Carter Jonas letter argues that it has not been demonstrated that the job opportunities will be additional to the jobs that already existing in Bicester and Oxfordshire (though it does commend the opportunities provided for a diverse workforce and career progression case studies). However, the Economic Statement prepared by Volterra and submitted with the planning application goes into some detail to show that not only is there existing demand for jobs in the local area which is not being filled, but that this demand is expected to grow significantly in coming years through development in the area. Indeed, the report shows that there are 4,400 residents in Cherwell alone who are economically inactive but are looking for a job. There is also significant demand among young people and students but they do not show up in employment statistics, and significant housing growth planned in Cherwell and Bicester in particular (noting that the proposed development would secure links between the site and Bicester). The report shows that between 2017 and 2027, there is forecast to be 19,500 additional working age residents (18 to 64) in Cherwell, 13,100 of which are expected to live in Bicester. Cherwell is anticipating 2,300 additional 16 to 21-year old residents over the 10-year period, an



increase of 26% compared to 17% across Oxfordshire. This means that, on top of the current demand for work, the need for jobs is likely to increase significantly over the next 10 years.

All of this shows that the job opportunities provided in the area are not sufficient for local demand. The demand for local jobs is also expected to grow significantly in coming years due to housing demand. This indicates that the jobs provided at the proposed development would be additional to the opportunities that already exist locally. CPC fail to support any of their assertions or counter any of the detailed analysis that Volterra have provided as part of the planning application.

CPC's response (at paragraph 4.3) refers to the Oxfordshire Local Industrial Strategy ambition to position the county as one of innovation, world-leading science, and pioneering the UK with emerging technologies and sectors. Whilst this is clearly a strong objective, it is not, nor should it be, mutually exclusive with providing a wide range of job and training opportunities for the diverse, growing and changing population of Oxfordshire. As set out above, the proposed development will contribute very positively towards delivering jobs that local people and future residents will need. Furthermore, the proposed development is not in the scientific innovative sector that the LIS is targeting, however the development will be the first investment of this type in the UK, it will diversify the tourism and leisure offering, and in doing so will attract more visitors into Oxfordshire – as highlighted in the Economic Statement, this brings with it positive economic and social benefits. The Oxfordshire LEP strongly acknowledges the importance of the visitor economy to the county, citing the range of attractors for tourists, and the growing importance of this sector in the context of Brexit. In relation to the visitor economy, the LEP in July 2019 said *"In a nutshell, it's a sector we must not ignore and continue to nurture and grow"*. The proposed development will provide a considerable boost to local tourism, thus being consistent with the county's desire to nurture and grow its visitor economy.

Hotel Need

At paragraphs 4.4 to 4.13, Carter Jonas seem to suggest that the proposed development fails to align with forecast hotel demand and that it could prejudice existing and emerging / allocated hotel provision in the area. The Applicant has engaged closely with CPC through pre-application stage exhibitions and briefings and the Great Wolf Lodge concept explained in detail. It should therefore be clear that the proposed development is a very different concept to existing hotels outlined in the letter and would not in any way pull people from these other hotels. This objection is therefore considered to be entirely inappropriate. Moreover and notwithstanding this point, 'need' is not a planning test and therefore not a consideration in terms of the acceptability of the proposed development.

Sequential Assessment

In terms of the critique of the sequential assessment, at paragraphs 4.14 to 4.22 of the Carter Jonas letter, we feel that the assessment methodology has been clearly established both in terms of the specific locational criteria required and also the inappropriateness of disaggregating the component part. Both are standard practice in terms of applying the sequential assessment requirements and this is fully supported in the Planning Statement. In terms of the towns selected as part of this assessment, these are all within the identified area of search (noting also that there is a requirement to be located in close proximity to such a town in itself is one of these criterion). The sites also have been chosen as being those sites in or edge of these town centres, or as part of allocations. Again, this is also standard practice and is set out in the Planning Statement. Referring to paragraph 4.21, the 'front nine' holes are not included as part of the sequential assessment on the basis that, like the application site, it is in an out of centre location and not in a more accessible location.



Conference Facility Need

The conference facility, when taken as an independent use (notwithstanding the point above on disaggregation) does not need to be justified on the basis of 'need', as there is not a planning policy test requiring this. Notwithstanding, these other facilities (RAF Bicester or Bicester Hotel Golf and Spa) are not located within town centres and therefore not afforded policy protection in line with the development plan or NPPF.

Resort vs Hotel

The Carter Jonas letter also questions the use class of the proposed development. As accepted by Carter Jonas and CPC, the proposed Great Wolf Lodge includes a range of activities and functions, this is agreed. It is not clear what point Carter Jonas are trying to make in paragraph 4.31, and whether they are arguing for this to be a hotel with ancillary uses or a destination resort. As agreed with CDC during pre-application discussions, the proposed development is considered to fall outside of a single use class, as defined, thus the Sui Generis categorisation. The benefits associated with specific use classes are to some extent irrelevant here as the detailed economic impact work has been done on the basis of an operational Great Wolf Lodge in line with its established concept and business plan.

Economic and Social Benefits

In Section 5 of Carter Jonas' letter, CPC raise concerns regarding the validity of the claims that there will be £4.9m of additional spend as a result of the proposed development. It seems that these concerns relate to the assumption that 25% of guests' total spend on food and drink will be outside the proposed development in the rest of Oxfordshire. CPC expects the majority of spending to be within the development due to the range of dining options provided. The response also notes that those who do leave to spend money elsewhere are likely to do so by private car given the closest alternative eating options are a journey away. Volterra, in preparing the Economic Statement supporting the application, agree that the majority of spending will be within the proposed development. The Economic Statement (and socio-economic chapter of the ES which follows the same approach) therefore assumes that all the visitors spend on attractions would be within the proposed development (i.e. a conservative 'worst case' for economic benefits purposes). It also assumes that 75% of food and drink and shopping expenditure would take place within the proposed development. The remaining 25% (which is only 11% of total visitor spend – a low proportion) is assumed to be spent elsewhere in Oxfordshire. It is agreed that the majority of guests are unlikely to leave the proposed development and spend money outside of the site. The majority of this expenditure is expected to happen on guests' journeys to the resort or on their journey home. For example, this assumes that guests might travel to nearby Bicester Village for some shopping on the way home or they might go to another tourist attraction elsewhere in Oxfordshire for lunch on the way to the resort. This is a common travel pattern for visitors.

These trips are not expected to result in additional traffic movements as they are already occurring. For the few visitors that are expected to leave the resort and spend money outside the site during their visit, the majority of this would be where guests are expected to take advantage of the shuttle buses (however and as expressed earlier in this letter and in the Transport Assessment a level of such trips are factored in to the traffic impact assessment). It is relatively common on family holidays for one parent to take some time to themselves while the other enjoys activities with the children. It is therefore envisaged that one parent might pop out shopping or to play golf or have a spa treatment at the adjacent resort as part of their overall trip. Given the unique nature of this proposal coming to the UK and to this location, it clearly cannot be modelled with any certainty exactly where this spending will occur, but based on industry standard approaches where possible and benchmarking, the conservative assumptions applied are considered to be a reasonable estimate of the likely magnitude of off-site visitor expenditure resulting from the proposed development. Again, Carter Jonas / CPC do not offer any alternative methodologies or calculations.



In terms of worker expenditure, CPC's response questions the validity of the calculation for worker expenditure. This calculation also assumes that workers will spend money on their way into or home from working at the resort in places such as Bicester Village. Given the lack of options in immediate proximity to the site, as identified in the CPC response and the Economic Statement, the number of trips made during breaks would be limited. That said, we acknowledge that this spending is unlikely to be significant. The socio-economic chapter of the ES scopes this out on the basis that the levels of expenditure would be insignificant relative to the expenditure in the local area. CPC make a similar point in reference to construction expenditure. This is also scoped out of the socio-economic chapter of the ES because the temporary expenditure and revenue generated by workers at the Proposed Development during the Construction Phase would not be significant relative to current levels of expenditure in the local area. These figures are presented in the Economic Statement for completeness. There will be an economic benefit in terms of supporting additional spending locally, but as noted above, these are minor in the context of the local economy and in line with this, conservative assumptions have been applied and it has been scoped out of the socio-economic chapter and so these benefits are not claimed as significant in environmental impact assessment terms. Nevertheless, the numbers cited are justified and assumptions fully set out in the planning application.

The CPC response notes that it is not clear how the jobs provided for by the proposed development would fit with the Local Industrial Strategy and Oxfordshire's focus on high-value job, apprenticeships and the science and technology sector. However, this is just one target of the Local Industrial Strategy which also aims to create *"longer and more flexible careers for older workers, and improved access to emerging jobs for younger people"*. As noted above, there are local people currently seeking work not fully reflected in unemployment statistics, and there is considerable population growth planned in the area. These existing and future workers will require a diverse range of jobs opportunities, which the proposed development contributes positively towards delivering.

Nature Trails / Public Right of Way

Considering paragraphs 5.10 to 5.12, Carter Jonas question the level of use of the proposed nature trails, owing to their 'opening hours' and also their location. As clearly stated in the Planning Statement, this is presented as a public benefit on the basis that it provides a publicly accessible green space which is connected into Chesterton village through a new shared footway / cycleway. This is a considerable improvement to the existing situation which provides part of a private golf course with no safe and dedicated access on foot or by bike. To suggest that the benefit of the nature trails (which Carter Jonas and CPC seem to accept) will be reduced as furthest away from Chesterton is therefore hard to defend. In terms of when this part of the application site will be accessible, this is during daylight hours; a common arrangement for public parks of this type.

The comment at paragraph 5.12 that the public right of way is being replaced by the nature trails is untrue. As set out in the application, a new public right of way is being provided (one which is useable on the basis that it does not go through a golf course with trees, ponds and lakes blocking the route). In terms of the comments by Carter Jonas at paragraph 5.11 that *"it is considered unlikely that a net gain in biodiversity will be achieved because the new nature reserve only protects a small section of the existing green infrastructure at this site"*, this demonstrates a misunderstanding of the Biodiversity Net Gain methodology, which carefully assesses the value of habitat types in the existing and proposed scenario. Should planning permission be granted, the requirement to achieve a biodiversity net gain will be secured by planning condition.



Summary

We hope that this letter provides a useful series of comments and responses to those specific concerns and objections raised. As we have reiterated throughout the thorough pre-application process which has included two well attended public exhibitions and additional public briefings with CPC and others, we have and continue to listen to refine the proposals and ensure that the proposed development delivers considerable environmental, social and economic public benefits. We are of course happy to continue to engage further with CDC, CPC and other stakeholders as this letter is considered.

Should you have any questions we would be happy to discuss these further.

Yours sincerely,

Peter Twemlow

DP9 Ltd

Encs.

CC

Jeremie Babinet, Robert Moore – Great Wolf Resorts