

**10875 – Great Wolf Lodge, Bicester
EPR Architects Rebuttal Architectural Evidence**

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Proposed Great Wolf Lodge
Chesterton, Bicester

**Architectural Design and Scheme Development
Rebuttal Evidence on behalf of Great Lakes UK Limited**

of

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Illustration of the Great Wolf Resort, Bicester: Arrival and Entrance

EPR Architects

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1.0 Introduction

- 1.1 My name is Nick Rayner. I am a qualified architect with over 20 years of architectural design experience. I have been registered with the Architects' Registration Board (ARB) since qualification in 2001, and a member of the Royal Institute of British Architects (RIBA) since that time. I have already provided a proof of evidence and appendices.
- 1.2 CDC and the Rule 6 party, Parishes Against Wolf (PAW) have submitted own evidence in relation to Reason for Refusal 4 from Andrew Bateson and David Huskisson (CDC), and Steven Sensecall and Andrew Cook (PAW). This rebuttal document provides a written response to some of the points raised where it may assist the Inquiry to have this in writing before the inquiry. I do not respond to every issue and reserve the right to comment as necessary at the inquiry. This should be read with my main proof of evidence which I do not repeat. I group my response under subject-headings below.

2.0 Size, Scale, Massing and Appearance

2.1 Proof of Evidence (PoE) by David Huskisson – Landscape:

- 2.1.1 Mr Huskisson provides various negative descriptions of the proposals with which I strongly disagree, principally for reasons dealt with in my main evidence. At paragraph 3.10 he suggests "*the development as seen from the entrance would be one in which the excessive height and width of the hotel aspect would dominate in the foreground*". This is not correct. The proposals clearly show how the building is intentionally revealed from the approach through the landscape proposals and broken-down massing. The building will be visible as a cluster of buildings revealed through the landscape upon approach to the central guest arrival point. This is part of the Great Wolf experience, that of expectation and excitement on arrival at the resort. The design also offers clear wayfinding for guests which is essential to the resort's operation, and for safety.
- 2.1.2 Mr Huskisson also comments on the design philosophy for the proposal, and the key conceptual themes that underpin the development and at paragraph 3.11 contends there is a conflict between the key themes. There is, in fact, no conflict between the themes/diagrams. Theme 2 states "*The Great Wolf Lodge addresses its perceived scale and massing through design and materiality to stand comfortably in its expansive landscape context.*" (DAS at pg. 29). This is precisely what the scheme does. The perceived scale and massing are broken down using varying sizes/forms of building and the different articulation and character to each component. It is further broken down by the landscape proposal, with which it works in harmony, to provide glimpsed views of the building on the various approaches onto the development Site through the layering effect (theme 1). This is then reinforced by theme 4 which illustrates how the scheme is further broken down into its constituent

parts. The fact that the hotel wings are taller than the FEC aids in screening the waterpark building and slide tower from views from the north. It is a part of the proposal where there is more scope to control the massing the most and that is why the scheme is presented as part 3 part 4 storeys in this location, with a plan form that turns and is broken down. The waterpark, by necessity of its functionality, is essentially one room and therefore more difficult to sculpt, hence its position deeper into the Site, screened from view by the hotel in the foreground.

- 2.1.3 Mr Huskisson also notes that the width of the hotel building is 105m, but ignores the fact that it is presented as 3 different building typologies, in a variety of materials and styles, with broken up roof ridge lines, so does not therefore read as one continuous building length.
- 2.1.4 At 3.13 Mr Huskisson contends that the building is institutional in style and therefore not inspired by the typology of the manor house estate. I obviously disagree with Mr Huskisson's subjective view. The references to manor house estates relates to the formal arrangement of the buildings on plan, and the hierarchy afforded by a central, higher quality building, flanked by subsidiary supporting buildings which is the typology that has been adopted in the design process. In addition to that the buildings take reference from materials and architectural characteristics used locally.
- 2.1.5 At 3.15, Mr Huskisson goes on to question the detailing of the proposal and its effect on its perception. Again, I disagree with this analysis but note in addition that Mr Huskisson's analysis does not properly consider the integrated landscape design for the proposals. To the limited extent that the building is visible immediately at the Site boundaries, it is designed to be perceived through the landscape design and the layers of screening that it affords. This, alongside the variation in form, massing, materiality, and character is what will break down the perceiving size and scale of the building.
- 2.1.6 At paragraph 3.16 Mr Huskisson criticises the reference to the 14m height of the single storey element as being relatively low and then makes comparisons to heights of agricultural barns. This sort of criticism is unjustified. The point correctly being made is that the FEC is "relatively" low compared to the other parts of the building.
- 2.1.7 Having advanced various views with which I disagree about the appearance of the proposals, at paragraph 3.18 he refers to : "*the elevation that faces the main public external recreational area being visually dominated by incongruous blank walls of render and green corrugated metal sheeting with some low level timber detailing*" and suggests its pays no regard to the human scale of the proposal and how it will be perceived. However, the elevation at dwg 4206 (elev 2 part 3) is simply a true elevation drawn for the purposes of the application, but like any elevation does not consider the depth of field and perspective of the proposal for the view. The upper part of the building in this drawing will not be visible from ground level as it is set well back from the parapet edge. The middle

band of render will be visible but only above the awning structure below it. This awning structure, with its fine timber detailing and quality materials, will draw the attention and focus at ground level, and will be how one perceives this elevation, and this part of the building generally, from anywhere within the landscaped amenity area, the conference plaza, or the entrance to the woodland walk heading northwest. The illustration at page 86 of the DAS better provides an indication of how this elevation will be perceived. In addition, as this illustration shows, the landscape proposals for the woodland walk area will also screen the building, providing glimpsed views of the proposal upon approach.

2.2 PoE by Steven Sensecall – Planning:

2.2.1 Overall, this proof of evidence is concerned with other matters than architecture and design, but at paragraph 7.23 Mr Sensecall quotes from Great Wolf's Development Criteria located in their annual report. This is applicable to development in the USA. The UK market is a different development context to that of the US, with a different planning system for which there is a different approach, which is illustrated in how this architectural proposal has been developed and brought forward.

2.3 PoE by Andrew Cook – Landscape:

2.3.1 Mr Cook regularly refers to, and seeks to compare the Proposed Development with, the Great Wolf resorts in the USA. His argument appears to be twofold: 1) that the resorts in the USA are mostly located in urban or urban-edge centres and therefore ours should be; and 2) that the design has been "copied and pasted" onto the Site without any thought of the Site's characteristics, or consideration of the local area. I respond briefly to both these contentions below.

2.3.2 First, in relation to comparisons with schemes in the US and the suggestion by Mr Cook that the Proposed Development "*exhibits all the hallmarks of an urban environment so typical of the existing Great Wolf resorts found in cities across the United States*". I reject this assertion. The scheme has been designed for this site through a design process, accompanied by an LVIA, that is intended to be entirely appropriate for the Site. The fact that some US resorts have been designed for certain urban areas (in a very different locality where urban areas are fundamentally different to urban areas in the UK) is irrelevant here. Moreover, some US resorts are in rural locations. This sort of comparison is illogical and unprincipled and I return to it below. Second, there is no basis for suggesting that the design has been duplicated on the Site without regard to its characteristics. Whilst there are inevitably requirements for a resort of this kind to be incorporated (as with any building which has a particular use), such as the need for the slides and water areas, the approach to the Site, the design and the landscape has been driven by a site-specific approach.

- 2.3.3 At paragraph 3.15 of his PoE Mr Cook refers objections on the basis that it would “*create a ‘small village’ or large out of town shopping centre to give some sense of scale,*”. This assessment is unjustified. As explained in my proof, the proposal is for a resort hotel, entertainment centre and waterpark. The characteristics of the Proposed Development, in every aspect, are not that of a small village or shopping centre. The profile of guest arrival and departure, and the frequency of servicing and deliveries, will be managed by the resort and will not be akin to the movements associated with a series of individual dwellings that would make up a village, nor the frequency of activity that a large scale retail operation, with several independent outlets, would attract. Architecturally, as the DAS and my PoE explains in detail, the hotel component of the building takes its formal arrangement from a manor house typology, with the waterpark component beyond referencing the architecture of an agricultural barn. This is not akin to the architecture of a village or a shopping centre.
- 2.3.4 At paragraph 3.23 Mr Cook makes references to parts of the Case Officer’s planning report about the appearance of the building to which I have already responded in my main proof of evidence in terms of detailing of the scheme and the references to the local vernacular and my assessment of the design and from where it will be seen.
- 2.3.5 At paragraph 4.20 Mr Cook refers to proposed bunding which is addressed by Mr Waddell. The use of bunding does not reflect on the building’s high-quality appearance as Mr Waddell explained, but the principle of screening from certain locations as requested by CDC. Bunding is already present on the Site in its existing form, so there is nothing intrinsically unusual about this. The bunding also serves to complete the enclosure of the Site along the southern boundary, where the existing buffers of vegetation along the western and northern edges of the Site do not extend to the southern side. This bunding has a two way benefit, in that it screens the area immediately to the south of the Site from views from the resort (which was deemed to be a poorer quality landscape environment) and screens the service yard activities as viewed from outside the Site, with the building rising above the bunding.
- 2.3.6 At paragraph 4.24 of his evidence Mr Cook criticises the architectural detailing in the design, but in a way which does not reflect the proposals. For the reasons I have set out in more detail in my PoE, the appearance of the part of the building to which he refers has been significantly broken down in perceived scale using various architectural devices. The elevational treatment is presented in three different materials used in vertical bands across all the elevations. The plan form steps in and out to break up the façade and this is highlighted using different materials.
- 2.3.7 Mr Cook goes on to suggest: “*The buildings are more typical of the character and style of large hotels one associates with urban areas. The scale and proportions are extensive, creating a monolithic appearance which would be overwhelming and dominating in near views.*” ...
“*Collectively, all of these built elements would create a strong institutional character.*”. In fact, there

is no particular character association, or any particular association with, large hotels only being in urban areas. Hotels large and small are located where there is demand for them, be that in urban or rural areas and are often found in rural areas. The appearance of the hotel will not be monolithic. It has a varying roofscape, different vertical bands of materials, and undulating plan form. As I have noted in my PoE and above, the proposed design does not display any of the characteristics associated with an institutional building. It does not have any kind of rigid uniformity, or dull / drab appearance. I consider this criticism is unjustified.

2.3.8 At paragraph 4.25 Mr Cook again seeks to suggest that a “*north American example*” was used as a precedent. This is simply incorrect. The DAS illustrations show US equivalents to show how the design has been adapted to suit the locality, context, and Site.

2.3.9 In section 10 of this PoE, starting at paragraph 10.12 Mr Cook suggest that the scheme has “unremitting elevations”, which is not the case. The ridge and eaves lines are not uniform but separated with hips and gables (and half hipped gables) and are at differing heights with two sections of the hotel a whole storey lower than the other parts. It appears as a cluster of buildings set into a well-designed landscape proposal which screens and provides glimpses of those broken-down building forms. As to its style and design in terms of other buildings and forms in the Cotswold area, I have already explained the detailed analysis and consideration that was given to these matters in my evidence and the way in which the design of the proposal is anchored in the Cotswolds by the contextual response of the local vernacular, as well as the sensitive placement of the building in a well-screened landscape setting.

3.0 The Landscape Led Approach

3.1 Both Mr Cook and Mr Huskisson seek to suggest that there has not been a “landscape led” approach. I very much disagree. I refer to the DAS and my main proof of evidence which explains in some detail how it was landscape-led. The initial Site analysis work on my part was to assess all the constraints and opportunities that the Site presented and to determine if the proposed brief could be accommodated on the Site. As noted in my proof, there is necessarily a requirement for a large building, but the Site that has been chosen is a large Site and it was determined that the Site has the capacity to comfortably accommodate the building as it clearly does, along with the car park and other outdoor programmes with a generous amount of space around it. From a volume/massing perspective, initial discussions with BMD determined that the Site was already well screened, with established vegetation that could be enhanced with proposed landscaping to further screen the building from view. This process illustrates the importance placed on the landscape led approach.

4.0 Topography and Site Levels

4.1 Mr Huskisson suggests (see 13.0 of his summary proof) that the building is not responsive to subtle landform with a single level. There is no proper basis for this criticism. The resort experience for guests is a sequential route from the foyer through the connector zone and into the FEC, culminating in the main attraction of the resort, the waterpark. To make this circulatory route as accessible and inclusive as possible for all it is necessary to have a single ground floor finished floor level for the main guest areas. Introducing ramps or gradients internally would introduce barriers to access for all, which would be contrary to the principles of the Equality Act 2010 and the Building Regulations. It would also present a potential hazard for guests as they often walk straight from the pool area through the FEC. In addition, the servicing and operational requirements connect into the front of house areas at various points, and therefore level access to these is essential for the operational needs of the resort.

4.2 The Site has a change in level of approx. 7m over the total length of the Site, which measured north to south, is approx. 550mm. This is an average gradient of approx. 1 in 80 which is very shallow and can therefore accommodate this single finished floor level across the resort which further indicates its suitability for such a proposal. Nevertheless, the design still responds to the shallow gradient by locating the building at the topographically lower end of the Site. This decision is based on:

- The desire to keep the building away from the A4095 and the residences of Vicarage Farm and Stableford House
- To locate the building in the area considered to have the greatest capacity to accommodate the building
- Retain the ponded area to the north west corner of the Site
- Facilitate the location of the car park
- Locate the building away from sensitive viewpoints and the topographically higher point on the Site and,
- Minimise impact on the plantation woodland in the centre of the Site and retained vegetation along the current 10th fairway

4.3 The careful selection of a finished floor level (FFL) above ordnance datum (AOD) of +82.7m was made so that there was a balance of areas that would need to be excavated and those that would need to be raised up. This is critical in maintaining an overall harmony with the existing topography and is a sustainable approach. Again, this illustrates the landscape led approach that was taken.

4.4 At paragraph 3.6 of his main PoE, Mr Huskisson notes that the continuous FFL:

“has the effect of raising the tallest part of the proposal, the water flume tower, 1.5m above the existing ground level when it should be expected that every opportunity would be taken to hold levels down”

4.5 I disagree with his criticism. As noted above, every opportunity was taken to hold levels down. The proposed levels were determined in line with the landscape led approach to manage “cut and fill”, locating the elements of the building to preserve the central established woodland in the northern central part of the Site. If the slide tower and waterpark were positioned further north, cut further into the land, this would risk impacting on the plantation woodland in the centre of the Site.

4.6 At par 3.17 DH argues that the visual impact on view 4 of the LVIA has not been minimised:

“for View 4, the slides would be in view, at least initially, and as I note above, the FFL is raised above existing ground levels, so it is not clear that the impact has been minimised”

4.7 View 4 is not considered to be a particularly sensitive viewpoint as it is affected by the view of the M40 with its roadway and signage dominating the view. The location of the slides and tower here is entirely suitable. The reasons for raising the FFL at this point are noted above and demonstrate the landscape led approach to the Site overall. And as Mr Huskisson himself concedes here, at year 15 the slides and most of the slide tower are completely obscured in this view anyway.

4.8 Mr Huskisson also queries in this paragraph:

“why the protruding water flumes, claimed to be an iconic feature, are proposed to be hidden away where the viewers will be staff and delivery drivers”.

4.9 It is the experience of using the slides that is important and iconic presence for guests, not a visual prominence. It is the main activity attraction of the resort and part of the iconic experience of the resort’s offering as a whole. The external physical view of the slides themselves is not the iconic feature. This represents a fundamental misunderstanding on Huskisson’s part of the nature of the proposal and who it is catering for.

5.0 Car Park Design

5.1 At paragraphs 3.25-3.27 Mr Huskisson now makes various comments on the design of the car park, including the following in particular:

- a. The use of grasscrete to the eastern parking bays
- b. The layout of the car park generally, and,
- c. potential conflict between car park users and the service road

5.2 He comments at 3.25:

“If the use is to promote a “green” finish, I question why it has not been used throughout.”

- 5.3 Richard Waddell also addresses these comments. The area of grasscrete car parking is designed as an overflow to the main car park for ordinary cars. The grasscrete serves to visually delineate this use for users using a more landscape led approach than simply signage. It also serves to provide additional greening of the car park nearer to the adjacent residences at Vicarage Farm and Stableford House. This is not to say that the other proposed landscape features do not adequately screen the car park, merely that this additional measure adds further layers to the soft landscape emphasis.
- 5.4 At paragraph 3.26 Mr Huskisson suggests that: *“at least a proportion of the parking would have been in discrete pods, screened from the frontage and other parts of the site. This would help to reduce the unfortunate and obviously urbanising effect of the car park being spread across the hotel frontage and might also have helped with the lighting impact. This approach is often adopted at other holiday destinations and would also be more indicative of a landscape first approach.”*
- 5.5 As the DAS and my proof explains in detail, to arrange the car parking in discrete pods woven through the Site would have created a much greater expanse of parking overall, due to inefficiencies in the layout, which would be of greater detriment to the existing landscape. It would also create a less legible and confusing arrangement for guests. It would also fundamentally miss one of the key experiential parts of the Great Wolf Resort. The long approach to the porte cochere, where the hotel is gradually revealed through the landscape screening, is an important part of the experience and engenders a sense of expectation and excitement for guests. It is also an important way-finding tool so that guests can easily identify the main entrance and the location for guest drop off. This, in turn, aligns with the operational management strategy of the resort to provide a safe, secure, and smooth arrival procedure for guests.
- 5.6 A balanced approach to the car park design was taken to ensure that the car park design retained trees where possible, enhanced with additional soft landscaping, whilst providing a legible and efficient car park design that fulfilled the operational and experiential requirements of the resort.
- 5.7 At par 3.27 he claims that there is: *“something of a potential conflict between car park users and the service access around the south eastern corner of the site. In my experience it would not be unusual for these two types of traffic to be segregated where possible, especially in a large development. This is the case for the much smaller BHGC where there is a delivery access.”* His criticisms are incorrect.
- 5.8 The proposed service access road runs around the far perimeter of the car park on the eastern side. Upon entry through the single access point off the A4095, service vehicles and guest vehicles split off in two different directions. Guests arrive and head straight down the main approach to the drop

off porte cochere for check in. Service vehicles turn immediately left and follow the service road around to the loading bay. In addition, as this is a 24hr managed resort, deliveries and servicing traffic will be timed to avoid disruption to guests and key check in and drop off periods. The service access road proposal was reviewed in detail by, and developed in conjunction with, the Appellant's operational team and with Motion Transport Consultants and all were satisfied that this was a viable proposal for the operation of the hotel and the safety of guests.

- 5.9 As it has been noted in my PoE, it was deemed that a single point of entry into the Site would be the most desirable. From a traffic impact perspective, another entrance off the A4095 would impact on the location of the main entrance and its visibility splays and would conflict with this junction and the motorway flyover approach. From a landscape impact perspective, this would adversely impact on the vegetation buffer along the northern edge of the Site. This was therefore not pursued, illustrating the landscape led approach to the design.

6.0 Capacity of The Site and Building Footprint

- 6.1 Mr Huskisson and Mr Cook makes comments about the size of the proposed building relative to other buildings in the vicinity which I have already dealt with in substance in my main evidence. At paragraph 3.5 of his PoE, Mr Huskisson argues that: *"I would have expected there to be a careful consideration of the capacity of the site to accommodate a scheme and this should have given very careful consideration to building heights and massing"*.
- 6.2 Mr Cook also makes a similar argument in his PoE and presents a Figure Ground Model at Appendix 5 of his PoE to assert that the Site does not have the capacity to accommodate this development.
- 6.3 I disagree that this Site cannot accommodate the scheme and with Mr Cook's reliance on his figure ground model. In the case of Mr Huskisson, my PoE and the DAS explain how careful consideration of the capacity of the Site was indeed undertaken in the early design stages. As to the figure ground model, the capacity of the landscape and visual context, to accommodate any form of building, is not dependent on a comparison of the footprint of proposed built form with those in the surrounding area. It requires consideration of the landscape context and whether this is likely to be substantially influenced by the addition proposed. My evidence, along with that of Richard Waddell from BMD, demonstrates that the Proposed Development sits comfortably on the Site, and that the Site has the capacity to accommodate the development without any substantial or significant impact on the landscape character or views beyond the immediate proximity of the Site.
- 6.4 At paragraph 3.13 of his PoE, Mr Huskisson goes on to claim that: *"Unlike the appeal proposal, such historic precedents (Manor Houses) can usually be fairly considered to stand comfortably in their*

“expansive landscape contexts” forming a harmonious composition in the landscape, enriching character and visual amenity.”

- 6.5 As is well documented in my proof and explained above, the scheme does stand comfortably in its expansive landscape context as it is demonstrated that the Site is of sufficient size to comfortably accommodate the proposed building. Mr Huskisson largely contradicts himself as he then accepts this at 3.14 where he notes:

“Here, the only area that approaches being an “expansive landscape context” is that afforded by the balance of the site to the north,”

- 6.6 This area is approximately one third of the Site area, which shows that the proposed building does indeed sit comfortably in a very large Site, with space left over for this public parkland. It therefore does form a harmonious composition by being a landscape led architectural design working in tandem with the landscape design proposals, which enrich the landscape character.

7.0 Public Right of Way Matters

- 7.1 At paragraph 3.36 Mr Huskisson suggests that a more landscape led approach would have been to divert the Public Right of Way (PROW) to the west and around to the northern parkland amenity area, instead of out onto the A4095. Mr Waddell responds to this. To divert the route westwards would bring it closer to the M40 and the resort’s service yard. The noise from the M40 would result in a degraded experience for users. The route along the eastern part of the southern boundary and along the rural Kirtlington Road was considered a more suitable route. Mr Huskisson’s route would involve users walking around the back of the proposed building, with the built form continuously in view. The proposals keep the PROW away from the proposed building, within an attractive, heavily landscaped green corridor, providing a significantly improved and safer route for users. The proposed diversion route was also not objected to by OCC’s PROW Officer at the time of application.

8.0 Policy

8.1 Cherwell Local Plan Policy ESD15

- 8.1.1 In the case of Policy ESD15, I consider the Proposed Development is compliant with the principles set forth in this policy. The design is founded upon an understanding and respect of the area’s built, natural, and cultural context as my proof illustrates in detail. The proposed building, by virtue of its position (siting), orientation and layout, and massing, works in harmony with the landscape proposals which complement and enhance the context.

- 8.1.2 The proposal does meet high design standards by any metric, inter alia; energy use, regulatory compliance, accessibility, safety, materiality, and architectural features and articulation.
- 8.1.3 My PoE explains that the scheme respects and reinforces local distinctiveness by working in harmony with a landscape proposal that effectively screens the building from view in sensitive viewpoints. It therefore respects the items listed in the policy in respect of landscape features and local topography.
- 8.1.4 The Proposed Development respects the surrounding buildings by being sited well away from the two residential properties. There are no existing streets on the Site. There are no public spaces other than the PROW which is an unsafe and therefore underutilised route. The buildings do create defined and active frontages, although they do not front onto the public realm and therefore not applicable per se.
- 8.1.5 My PoE explains that the architectural design does respond to all the items listed with respect to elevational detailing, windows and doors, building and surfacing materials, and colour palette. In the case of mass and scale, local distinctiveness is responded to by the landscape design proposals which screen the building and provide features that contribute to and reinforce the character of the local landscape.
- 8.1.6 With respect to sustainable design and layout at the masterplanning stage of design, these impacts were considered as part of siting the built proposals and their orientation, including which parts of the Site to be public and private. This is evidenced in the DAS.
- 8.1.7 The analysis of context, and explanation and justification of the principles of the design are explained in the DAS. All issues relating to relevant compliance with this policy are referenced in the DAS and in the other application material.
- 8.1.8 At paragraphs 10.14 and 10.15 Mr Cook references Policy ESD15.
- 8.1.9 The Proposed Development complies with all the principles in the Policy. My evidence describes the design process and the sensitive siting of the building, its layout, and the high-quality nature of the design. The scale of the building sits within a Site that has the capacity to accommodate it and is well-screened by a landscape proposal that improves the landscape quality and appearance of the area. Where the building is visible it reflects local vernacular and architectural distinctiveness using the elevational detailing, windows and door designs, and materials. The design has clearly been informed by the analysis of the context, as set out in the DAS and my evidence, with an explanation and justification of the principles that have formed the design rationale. All of this is well documented

in the DAS, as required under the policy. Any assertion that this is not the case I consider to be unfounded.

8.1.10 In addition, any contribution to the area's character and identity and local distinctiveness should be in the context of the landscape setting, with which the proposed building works in harmony. It creates a resort set within an enhanced landscape proposal which makes a positive contribution to the local area by improving biodiversity, providing publicly accessible landscape amenity space (to create a new public parkland), with a strong sense of place, and reinforces local landscape distinctiveness. Where the building is visible on the Site, its architectural characteristics are recognisable and contextual to the local area.

8.1.11 Finally, regarding the form, scale and massing of the buildings, again this needs to be assessed against the visual impact on the context, rather than simply looking at the size of the building on its own. As noted above, the capacity of the landscape and visual context, to accommodate any form of building, is not dependent on a comparison of the footprint of proposed built form with those in the surrounding area, it requires consideration of the landscape context and whether this is likely to be substantially influenced by the addition proposed. In this case, the proposed building is well-concealed by the extensive vegetative screening of the landscape design.

8.2 The National Design Guide

8.2.1 Mr Cook's evidence refers to the National Design Guide (NDG) at pars. 4.1 to 4.10, and highlights two of the ten characteristics with which he alleges that the scheme does not comply, namely section 1, "Context", and section 6 "Public Spaces".

8.2.2 Key characteristic 1 – Context explains that:

"39 Well-designed places are:

- *based on a sound understanding of the features of the site and the surrounding context, using baseline studies as a starting point for design;*
- *integrated into their surroundings so they relate well to them;*
- *influenced by and influence their context positively; and*
- *responsive to local history, culture and heritage."*

8.2.3 My proof explains how the Proposed Development complies with all these requirements, contrary to the statement made in Mr Cook's PoE at 4.7. The DAS and my PoE demonstrate the understanding of the features of the Site and surrounding context, and that these were used to develop the design. The proposals are integrated into their surroundings by the landscape led approach which screens the building from view from sensitive landscape viewpoints through a synergy of architectural and

landscape proposed design. The scheme has therefore been influenced by the landscape context including the additional proposed vegetation which positively contributes to it. The architecture is responsive to the local history, culture and heritage of the area as is illustrated in the DAS, which shows EPR's studies of the local vernacular, the cultural history of the local area, and how the design has responded to these elements.

8.2.4 Furthermore, the NDG in section 1, "Context", goes on to state:

"41 Well-designed development proposals are shaped by an understanding of the context that identifies opportunities for design as well as constraints upon it." And:

"42 Well-designed new development is integrated into its wider surroundings, physically, socially and visually. It is carefully sited and designed, and is demonstrably based on an understanding of the existing situation, including:

- *the landscape character and how places or developments sit within the landscape, to influence the siting of new development and how natural features"* (My emphasis)

8.2.5 My PoE (at 2.4.4) and the DAS explain the clear design process that was undertaken at the outset of the project to identify the opportunities and constraints of the Site and how that was used to develop the design. My PoE goes on to explain how the building location and arrangement was carefully sited and designed to fit onto the Site and into the landscape.

8.2.6 Section 6, "Public Spaces" of the NDG is also referenced in Mr Cook's proof at 4.8. Extract from this section notes:

"100 Well-designed places:

- *include well-located public spaces that support a wide variety of activities and encourage social interaction, to promote health, well-being, social and civic inclusion;*
- *have a hierarchy of spaces that range from large and strategic to small and local spaces, including parks, squares, greens and pocket parks;*
- *have public spaces that feel safe, secure and attractive for all to use; and*
- *have trees and other planting within public spaces for people to enjoy, whilst also providing shading, and air quality and climate change mitigation."*

8.2.7 To clarify, most of the resort is intended principally for guests. The area of public space to which this section is relevant is the northern parkland area, which is currently not accessible to the public, but which the Appellant wishes to open up for use by the local community. It is not mandated that all proposed developments must provide public space accessible to all. Indeed, the imagery and narrative around section 6 shows that it applies mainly to urban and sub-urban public spaces.

- 8.2.8 Nevertheless, the publicly accessible parkland to the northern part of the Site does comply with the aims of section 6. The public space is well located near to Chesterton village with a proposed footpath and cycle path linking back along the A4095 to facilitate safe and sustainable journeys from the village. It will encourage social interaction with its outdoor areas and stopping points, promote health and well-being through the attractive proposed soft landscaping, and includes a variety of educational features. Clear wayfinding and identifiable pathways will ensure that the space feels safe, secure, accessible, and attractive for use by all. It will have trees and other planting to enhance the existing vegetation for people to enjoy, enhance ecological habitats and provide resilience to climate change.
- 8.2.9 The above points are supported by the CDC Committee Report which acknowledges that the scheme adheres to these principles. I therefore do not accept that the Proposed Development does not comply with the principles referenced in the National Design Guide or any other relevant principles set out therein.

8.3 Saved Policy C28

- 8.3.1 At 10.20 to 10.23 Mr Cook refers to Saved Policy C28 of the Cherwell Local Plan 1996. This policy refers to question of prominence of the development proposed, as well as the means of enclosure and landscape settings. It is clear from the evidence submitted that the Proposed Development has little prominence in the landscape on account of its low-lying topography and extensive natural enclosure afforded by the existing (and enhanced by the proposed) landscape. It has been demonstrated that the Proposed Development would not harm the appearance and character of the existing built environment, or the countryside, for these reasons.
- 8.3.2 The evidence submitted by myself and Richard Waddell of BMD confirms why we consider that the proposed building sits within a Site that has the capacity to accommodate it, in a well-screen landscape setting, and is therefore in harmony with the general character of its surroundings. Accordingly, the proposal is compliant with the explanatory memorandum to this policy.

8.4 Well-designed and safe built environment

- 8.4.1 In addition to these policy points, Mr Bateson makes a more general assertion in his PoE at paragraph. 8.20 and 8.23, that the Proposed Development: *“would not represent the creation of a well-designed and safe built environment.”*
- 8.4.2 It is difficult to understand this assertion. As the DAS and my proof explains, EPR has considerable experience and expertise in the design of hotels and resorts and seeks a collaborative relationship

with all project stakeholders to ensure that the proposed design is well considered. On this project we developed the design in conjunction with the local authority and other design consultants. We studied the characteristics of the local area and architecture, as well as the characteristics of the Site and immediate surrounds, and the resultant proposal responds to that context and fulfils the requirements of the project brief. The design proposal is therefore well designed.

- 8.4.3 Regarding a safe built environment, this is a paramount consideration of the Appellant due to nature of the clientele (families with children). It is essential to the Great Wolf experience that guests feel safe at the resort. Matters of security have been considered carefully within the proposals to provide both appropriate and proportionate security risk mitigation measures. As the DAS also explains (at pg. 82):

“A formal Security Needs Assessment (SNA) has been undertaken to determine security recommendations across the development. As part of the SNA, a detailed threat assessment has been completed that identifies the design basis threats from which the security risks are assessed. This approach will provide a robust, auditable methodology to identify the security risks posed to the site or assets and subsequent recommendations for treatment.

Throughout the process, reference to international best practice for the incorporation of security design into projects, such as Crime Prevention Through Environmental Design (CPTED) and engagement with both internal and external development stakeholders, including, but not limited to, the Thames Valley Police Designing Out Crime Officer (DOCO) has been taken.”

9.0 Comparisons with US Resorts

- 9.1 As noted above, Mr Cook’s evidence seeks to presents an analysis of the Great Wolf Resorts in the USA to advance two arguments as to the location of such resorts and the suggestion of a standard design approach. Neither argument is valid. I have dealt with the location of the resorts above, but I provide some further responses below.
- 9.2 The suggestion that a standard design has been applied is simply not true. My detailed account of the pre-application discussions and the iterative design process demonstrates that the brief for the project was carefully interpreted to provide a contextual response, where several Site arrangements and orientations were considered.
- 9.3 The comparison exercise he undertakes a nonsensical approach and irrelevant to this proposal. The resorts in the USA (for which Mr Cook does not provide any detail) do not provide an understanding of architecture of the Proposed Development which is governed by the plans and all the supporting

material we have provided. There are basic functional common elements to the resort brief, they all have hotel accommodation, an FEC, and a waterpark with slides, but a comparison beyond does not take the process anywhere, any more than it would for any type of building for a particular use. The architectural proposal should be reviewed on its own as that is how it was developed. As a designer I understood from the outset that this project would require a contextual response and the design evolved along that principle. The design should be judged on its own merits and not by making assumptions about what the building would look like based on others.

- 9.4 Mr Cook goes on to say, “*there is surprisingly little evidence of this in the DAS*” (i.e. comparison with the US proposals). That is precisely because the design of those buildings is not relevant to the Proposed Development. My proof documents the design process and how the project brief was interpreted for this Site in the UK, and the contextual response of the proposal.
- 9.5 Appendix 9 of Mr Cook’s proof provides illustrations of the resorts in the USA. Firstly, these illustrations do not represent the design of the proposed scheme. The assertion that “*This portfolio of resorts gives a very clear indication as to the character and appearance of what is actually proposed here in the Cotswolds*” is clearly not the case. The DAS clearly demonstrates how the characteristics of a Great Wolf Resort have been provided for the UK and in particular the locality of Bicester & Chesterton and on this site. Secondly, the US illustrations display a variety of characteristics. Whilst the resorts do tend to have a similar porte cochere canopy architecture (as do many hotels), the resorts are of varying heights, architectural styles, and materials to suit their locations. This demonstrates the adaptability of the brand and the Great Wolf company, and their understanding that the architecture of their resorts needs to respect and adapt to their locations.
- 9.6 Appendix 10 presents a map and image of each of the US resorts. It is not clear what this is intended to do. Appendix 10 illustrates that the resorts in the US have been placed in a variety of locations, urban, urban-edge and rural, with a diversity not tied to any type of setting or locale if the location in the particular place is suitable. Matters of proximity to transport networks and other issues of policy in the case of this proposal are dealt with by Mr Bell and Mr Goddard. An assertion that the resorts are inherently “urban” in their design in the US is actually unfounded on the facts.
- 9.7 At paragraph 3.29 Mr Cook seeks to describe the different settings of resorts in the US. Again, it is difficult if not impossible to gain anything of significance from different locations of different resorts in a different country, but there appears to be a reference to resorts in rural locations being screened. But I and Mr Waddell have already dealt with the suitability of this site and its well-screened nature to accommodate this proposal, along with the architectural response to the local vernacular.
- 9.8 In paragraph 3.31 Mr Cook provides a description of what he considers to be “typical” architectural features of the Great Wolf Resorts in the US, suggesting that it “*shows the real nature of the*

proposed buildings". As I have pointed out there is in fact a significant variety of form in the different US resorts. Again, it is not clear what point of criticism is being made; but for this proposal the building is both a response to the brief and a response to the Site and local area. Where there are similarities this is only because of a similar brief and functional requirements of the resort. Beyond that the architecture has evolved as a response to the local vernacular, the Site context, and the character of the area. I have dealt with other criticisms of the design elsewhere in my evidence.

9.9 At paragraph 4.10 Mr Cook states:

"The water park and hotel proposed is the first of its kind in the UK and Europe, proposed by Great Wolf Resorts, an American company who own and operate a chain of indoor water parks in the United States and Canada. Refer to my appendices 9 and 10. There are no examples in the UK to demonstrate design reflecting local vernacular."

9.10 This can hardly be a criticism of the scheme, namely that there are no examples of a Great Wolf Resort in the UK and so none which demonstrate a design that reflects local vernacular because it is the first. The implicit criticism makes no sense and reinforces the need to consider this proposal on its own merits, rather than compared to resorts in the USA. This is further evidence of the inappropriate and irrelevant comparisons Cook draws at paragraph 4.10 (supported by App 9 & 10) of his PoE.

9.11 At paragraph 4.31 Cook states that *"when one analyses the character and appearance, particularly the general layout of the many American resorts, when compared to the appeal scheme, the latter is not materially different"*. Whilst the project obviously has a similar functional brief to that of the resorts in the US and so common ingredients, I reject the notion that the character and appearance of the architecture can or should be assessed against other designs elsewhere rather than on its own merits. The scheme has been developed as a contextual response to the Site and surrounding area and should be considered on its own terms. This is clearly illustrated in the DAS.

9.12 At 11.8 Mr Cook states that the:

"proposal provides an indoor facility and does not need to rely upon a rural context in order to operate, hence the many city centre locations".

9.13 This is a confused argument. Just because a building does not necessarily depend upon a rural context to operate does not mean that it cannot be located within one. The resort does not rely on an urban context either. Other aspects such as proximity to Bicester, the transport network and the people it would serve are addressed by Mr Bell and Mr Goddard from other policy perspectives, along with the sequential site search that was carried out.

- 9.14 At paragraph 11.26 Mr Cook repeats a contention that the resort design has been “*lifted and placed on the site with no genuine regard to the site-specific circumstances pertaining to the site’s landscape context*”. I strongly disagree and consider that this is untenable in light of the documentary evidence as to the design process that has been followed.