



Proposed Great Wolf Lodge,  
Chesterton, Bicester

Rebuttal Evidence  
on behalf of Great Lakes UK Limited

of

Philip Anthony Bell BEng(Hons) MCIT MILT MCIHT

## REBUTTAL

PINS Reference: APP/C3105/W/20/3259189  
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## 1.0 Introduction

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

### Scope of Rebuttal Proof of Evidence

- 1.5 This Rebuttal Proof of Evidence is prepared in response to Proofs of Evidence prepared by Alan DeVenny on behalf of Oxfordshire County Council (OCC), Mr Andrew Bateson on behalf of Cherwell District Council (CDC) and Mr Rupert Lyons on behalf of Parishes Against Wolf (PAW).
- 1.6 This document is not intended to respond to every matter presented by the parties evidence, but instead focuses on those points I consider will assist the Inspector at this stage insofar as it provides clarification, corrections and relates to my evidence. I reserve the right to comment on those points not addressed in this rebuttal during the Inquiry. It should be read in conjunction with my main proof of evidence on which I continue to rely and the conclusions set out which I maintain, but do not repeat again here.

## 2.0 Reason for Refusal 2: Sustainable Transport

2.1 Reason for Refusal 2 of the Decision Notice relates to the sustainability of the Proposed Development in transport terms and the choice of travel modes available for future staff and guests of the Site which I do not set out again here.

### Evidence of Alan DeVenny on behalf of Oxfordshire County Council

2.2 I have reviewed the evidence of Mr DeVenny, on behalf of OCC, with regard to Reason for Refusal 2 and would make the following observations.

2.3 At paragraph 1.3 of his evidence, he confirms that his role is to:

“

- ▶ *Review all traffic and transport information submitted in support of the proposed development and all correspondence issued by OCC in connection with the submissions:*
- ▶ *Provide an expert witness to the inquiry process covering traffic and transport matters”.*

2.4 In reviewing all matters associated with the Proposed Development, he confirms at paragraph 3.23 that:

*“OCC is satisfied that the proposed improvements to sustainable transport infrastructure to make the site accessible are appropriate and can be secured through an appropriate Section 106 agreement.”*

2.5 The evidence of Mr DeVenny therefore confirms my own assessment and that of OCC, in their position as highway authority, that the Proposed Development is sustainable in transport terms and accords with the principles of the NPPF in this regard.

### Evidence of Andrew Bateson on behalf of Cherwell District Council

2.6 I have reviewed the evidence of Mr Bateson, on behalf of CDC, with regard to Reason for Refusal 2 and would make the following observations and corrections.

2.7 At paragraph 7.25 of his evidence, he confirms that:

*“the site is accessible by a range of transport modes and not wholly dependent on the private car. Public transport, cycling and pedestrian improvement measures that are now referenced in the draft s.106 Deed presented at this Inquiry [CD11-1] appear to have satisfied the Local Highway Authority in respect to transport sustainability.”*

2.8 I am of the view that this conclusion by Mr Bateson on behalf of CDC, along with conclusions of Mr DeVenny on behalf of OCC, demonstrate that the site accords with the principles of the NPPF with regard to sustainable travel.

2.9 At paragraph 7.25 of his evidence, Mr Bateson states that:

*“the District Council note that the public transport funding is time limited to ten years”*

2.10 This is not accurate. In OCC's consultation response to the planning application dated 10 January 2020, OCC requested a contribution of £1.6million to deliver a public bus service between the Appeal Site and Bicester and a further contribution to improve public bus stops in Chesterton. The contribution of £1.6 million was based on an expected cost the bus service of £160,000 for a period of 10 years. I would highlight that this is in excess of typical periods for which contributions are normally secured, which would be 5 years. The Appellant has accepted this contribution. No further requests for contributions towards public bus services have been made by either OCC or CDC.

- 2.11 In addition to the contribution towards a new public bus service, the Appellant has committed to operate a guest shuttle bus service and Bicester Village and Bicester North Stations and staff shuttle bus services between the Proposed Development, the train stations, town centre bus stops and key local residential areas. The proposed shuttle bus service bus services would operate free of charge to both guests and staff. The Appellant has confirmed that the proposed guest and staff shuttle bus services would operate in perpetuity and this would be secured through the Section 106 agreement.
- 2.12 Despite this, the evidence of Mr Bateson makes no reference to the proposed shuttle bus services (nor indeed the definition of sustainable transport modes in the NPPF), and the significant benefit those shuttle bus services provide to the sustainable transport provision at the site, nor that the Appellant has committed to maintain the shuttle bus services in perpetuity. On the basis that Mr Bateson does not (amongst other things) appear to have considered the benefits associated with the provision of the shuttle bus services which forms an integral part of the package of sustainable transport improvements, it is my view that the conclusion reached by Mr Bateson is flawed.
- 2.13 At Para 7.25 of his Evidence, Mr Bateson states that:

*"the cycle lane and pedestrian footpath improvement works now proposed would only facilitate safe access between the village of Chesterton and the appeal site, not to Bicester or its town centre."*

- 2.14 This is also incorrect and fails to acknowledge the contribution of £70,000 for cycle improvements between the site and Bicester, which has been agreed with OCC.

#### Evidence of Rupert Lyons on behalf of PAW

- 2.15 Mr Rupert Lyons has provided Evidence on behalf of Parishes Against Wolf (PAW). I have reviewed the evidence of Mr Lyons with regard to Reason for Refusal 2 and would make the following observations and corrections, in addition to the points already made in my main evidence demonstrating my clear disagreement with his views.
- 2.16 At paragraph 5.4 of his Evidence Mr Lyons asserts that recommended minimum width of a shared foot/cycleway is 3 metres. In fact the OCC document 'Oxfordshire Cycling Design Standards' advises that:
- "Usage should dictate the width of such paths, with 3 metres the recommended width, 2.5 metres the minimum".*
- 2.17 The width of the proposed shared foot/cycleway accords with OCC minimum guidance and is agreed with OCC, the relevant highway authority.
- 2.18 In paragraphs 5.17 to 5.19 and subsequently in paragraphs 5.22 and 5.23 of his evidence Mr Lyons sets out his understanding of the proposed improvements to public transport infrastructure on which his views are based. However, it is evident that Mr Lyons' understanding is incorrect and does not reflect the agreed position between the Appellant and OCC. For example, at paragraph 5.19 of his Evidence, Mr Lyons asserts that the proposed shuttle bus services are:
- "likely to be limited to two service per day".*
- 2.19 This is incorrect. As clearly set out within my evidence and within Technical Note 07 (CD10-21) submitted alongside the planning application, the proposed guest shuttle bus service would operate at an hourly frequency. In addition, the proposed staff shuttle bus would operate at an hourly frequency during staff changeover times.
- 2.20 Mr Lyons assumptions in making his assessment of the transport accessibility of the site are incorrect and do not reflect the agreed position between the Appellant and OCC.
- 2.21 At paragraphs 5.20 to 5.24 of his evidence Mr Lyons seeks to criticise the scope of the Travel Plan. I would highlight, however, that OCC has agreed that an updated Travel Plan will be secured by Planning Condition/ Obligation and the draft Section 106 agreement includes suitable Obligations in relation to the update and implementation of a Travel Plan. This is therefore a matter controlled by condition/obligation and the criticism is therefore unfounded.

2.22 At paragraph 6.12 of his Evidence, Mr Lyons asserts that:

*“the Appellant’s chosen proxy for the appeal proposal has car dependency of 98% for visitors (32% as driver, 66% as passenger), and that less than 2% of visitors are likely to travel by sustainable modes of travel.”*

2.23 This is incorrect. The Appellant has not utilised mode share data from a Center Parcs site as a proxy for the Appeal proposals in the way suggested. Data from surveys of a Center Parcs site were utilised to undertake a sensitivity test, as requested by OCC, to demonstrate that the proposed trip generation analysis is highly robust. That sensitivity test was presented within Appendix H of the submitted Transport Assessment for completeness. The Center Parc data is neither a target nor indicative of the assessed mode share for guests or staff at the Proposed Development.

### Summary

2.24 It is evident that OCC, the local highway authority, have no objection to the Proposed Development on the grounds of sustainable travel choices and I strongly agree with this for the reasons set out in my evidence overall.

2.25 Although CDC has put forward an objection on the grounds of sustainable travel choices, it is not supported by proper evidence and Mr Bateson acknowledges that a package of works has been agreed with OCC that will *“ensure that the site is accessible by a range of transport modes and not wholly dependent on the private car”*.

2.26 In addition, it is evident from Mr Bateson’s evidence that CDC’s assessment is not based on full consideration of the complete package of sustainable travel measures and infrastructure that is to be delivered as part of the Proposed Development, including the proposed shuttle bus service and contribution to cycle route improvements and the definition of sustainable transport modes in the National Planning Policy Framework, as dealt with in more detail in my main proof of evidence.

2.27 As to the evidence of Mr Lyons, on behalf of PAW, it is also evident that his understanding of the proposed shuttle bus services is incorrect and does not reflect the agreed position between the Appellant and OCC and his comments regarding the proposed shared foot/cycleway are also inconsistent with the agreed position between the Appellant and OCC and I fundamentally disagree with his views for the fuller reasons set out in my main proof of evidence which I do not repeat again here.

### 3.0 Reason for Refusal 3: Traffic Impact

- 3.1 Reason for refusal 3 relates to the highway impact of the development which has been specifically confirmed by OCC and CDC as being limited to the effect on the signalised junction between the B4030 and B430 junction in Middleton Stoney and states:

*"The proposed development fails to demonstrate that traffic impacts of the development are, or can be made acceptable, particularly in relation to additional congestion at the Middleton Stoney signalised junction of the B4030 and B430. As such the proposal is contrary to Policy SLE4 and ESD15 of the Cherwell Local Plan 2011-2031 Part 1, Saved Policy TR7 of the Cherwell Local Plan 2011-2031 Part 1, Policy 17 of the Oxfordshire Local Transport Plan 4 and Government guidance contained within the National Planning Policy Framework."*

#### Evidence of Alan DeVenny on behalf of Oxfordshire County Council

- 3.2 I have reviewed the evidence of Mr DeVenny with regard Reason for Refusal 3 and provide the following observations and corrections in addition to what I have already set out in my main evidence.
- 3.3 First, I note at paragraph 3.24 of his evidence Mr DeVenny states that:
- "OCC have objected to the traffic impacts of the development in relation to the B430/B4030 Middleton Stoney junction. OCC are satisfied that the development will not have a severe impact at other junctions on the highway network"*
- 3.4 Mr DeVenny confirms that OCC is satisfied that the development will not have a material on other junctions on the highway network and that OCC was content with all of the information supplied in order to reach that conclusion. There has, for example, been no requirement for additional sensitivity testing being undertaken of different scenarios which is a point I will refer back to with reference to the evidence of Mr Lyons on behalf of PAW.
- 3.5 Paragraphs 3.52 to 3.97 of Mr DeVenny's evidence principally address the modelled effects of the proposed development on the Middleton Stoney junction and a view being expressed that there would be "severe" impacts on it, a view with which I strongly disagree for the reasons set out in detail in my main proof of evidence which I do not repeat again in full here.
- 3.6 In short, Mr DeVenny contends that the Proposed Development will result in a severe impact on the operation of the B430/B4030 junction in Middleton Storey during the morning peak hour. My evidence demonstrates that the trip generation presented in the Transport Assessment is robust. The evidence presented by Mr DeVenny on behalf of OCC details that he agrees with this approach. I strongly disagree with his view that the resulting impact is "severe".
- 3.7 But in addition, it is relevant to note the way in which the Transport Assessment has calculated the effects which does not include factors which will inevitably reduce the levels of traffic anyway.
- 3.8 For the purpose of clarity, I can summarise the reasons why the trip generation analysis presented in the Transport Assessment was robust (in the sense of being highly cautious) as follows:
- ▶ The surveys were undertaken over a peak period, public holiday weekend;
  - ▶ The surveyed sites include comparable conferencing facilities and there were conferencing events taking place at the time of the surveys;
  - ▶ A sensitivity analysis was undertaken and this resulted in less vehicle trips than the adopted trip generation analysis;
  - ▶ The trip generation analysis does not take account of any of the benefits of the package of sustainable transport measures including the shuttle bus services, which will reduce vehicle trips to the site; and,
  - ▶ The trip distribution analysis is based upon a single distribution, as agreed with OCC, based on guest catchment, resulting in a very robust assessment of the impact of the development of junctions further afield from the Site including the B4030/B430 junction in Middleton Stoney.

- 3.9 With regard to the trip distribution analysis, for simplicity and in agreement with OCC, this assumed a single distribution of vehicle trips associated with the development based on the catchment area of guests. It is, of course, evident that staff trips will originate from a more local catchment area than guests. Based on information from existing Great Wolf sites in the US, it is estimated that approximately 75% of vehicle arrivals at the site during the morning peak hour will be associated with staff rather than guests.
- 3.10 The distribution analysis assessed within the Transport Assessment, which assumes a single distribution. Thus, at Paragraph 3.38 of his evidence Mr DeVenny acknowledges that a 125 mile catchment area for guests was assessed for the distribution of trips associated with the Proposed Development and this approach was agreed with Officers at OCC. Mr DeVenny also acknowledges that a large proportion of staff trips will take place within a more local catchment area to Bicester. This inevitably means that the distribution analysis assessed within the Transport Assessment provides a very robust (in the sense of being overly pessimistic) assessment of the impact of the development on junctions further afield from the Site including the B430/B4030 junction in Middleton Stoney, as staff trips will originate from a more local catchment area than guests and would not route through the B430/B4030 junction in Middleton Stoney.
- 3.11 Both Mr DeVenny on behalf of OCC and Mr Lyons on behalf of PAW are referring by way of concerns to the effect of the Proposed Development on the Middleton Stoney junction during the weekday morning peak hour. During the weekday morning peak hour a significant proportion of trips associated with the Proposed Development that are assumed in that distribution model represent staff trips which would not be routeing through the Middleton Stoney junction but emanating from the main geographical source for employment, like Bicester itself and therefore would not route through the B430/B4030 junction in Middleton Stoney.
- 3.12 With 75% of vehicle arrivals in the morning peak period associated with staff, only a very small proportion of these are actually likely to be travel through the B430/B4030 junction in Middleton Stoney. As to the remaining 25% of trips associated with guests, even if there remained any residual concern about these trips, they can be materially controlled in practice through the imposition of a Planning Condition of the type that I identified in my main evidence. Again, I emphasise that I do not consider the modelled effects of the proposed development to be material, let alone severe, anyway it is clear that the actual effects (taking account of staff), coupled with the ability to influence guest trip timings through a planning condition, mean that even if there were any residual concerns, these can be fully addressed without any additional mitigation proposals anyway.
- 3.13 Leaving this basic point aside, and turning to the mitigation that has been proposed if it is considered necessary, at paragraphs 3.121 to 3.127 of his evidence Mr DeVenny seeks to comment on matters raised within a Stage 1 Road Safety Audit of the mitigation works at the Middleton Stoney junction that were proposed if mitigation is considered to be necessary. Unfortunately, Mr DeVenny fails to refer to the fact that the Stage 1 Road Safety Auditor's comments were the subject of a Designer's response and the Safety Auditor was content with the Designer's Response to the Safety Audit. The points that were raised were all satisfactorily addressed.
- 3.14 At paragraphs 3.128 to 3.150 of his evidence Mr DeVenny comments on the swept path analysis of vehicles through the Middleton Stoney junction which was undertaken. His first point relates to the oversailing of kerbs. In fact all vehicles, particularly large ones, are designed to over-sail kerbs to aid manoeuvrability. It is a matter of simple common sense that the driver would not do so if there happened to be a pedestrian there at the time. If it were thought necessary, the island can be constructed to ensure that it is over-runnable, for example using contrasting paving. This would still provide a significant betterment for pedestrians in comparison with either the existing or Heyford Park phase 2 arrangements by creating a pedestrian crossing in an appropriate location. Moreover, the pedestrian refuge was included within the mitigation works as a proposal in response to comments raised by OCC in relation to the crossing. I have always been on the view that the pedestrian refuge is fact unnecessary, in particular give the likely very low pedestrian flow at the junction, but providing it as indicated, including constructing it in a way which can be overrun where necessary by a vehicle, would still a betterment for pedestrians. This criticism is therefore misplaced.



- 3.15 I would also note that as part of the consented Heyford Park Phase 2 development it is proposed that a HGV restriction is placed on the eastern B430 arm of the junction and a bus-gate is introduced on the B4030 west of the junction. With the introduction of the bus-gate and HGV restriction, it is highly unlikely that there would be any east-west HGV movements at the junction anyway. I have undertaken swept path analysis for a standard bus moving east-west through the junction. This is attached at [Appendix A](#) and demonstrates that the vehicle can manoeuvre appropriately through the junction with the proposed mitigation works in place.
- 3.16 At paragraph 3.57 of his evidence Mr DeVenny notes that detail of the mitigation scheme associated with the Heyford Park Phase 2 development has not been approved. Whilst this is acknowledged, the assessment has been based on the mitigation scheme proposed by the applicant of the Heyford Park scheme and I would highlight that the Heyford Park has been granted planning permission. The assessment has therefore been undertaken based on the most current information available and I am not aware of any alternative highway mitigation scheme at this junction proposed in association with Heyford Park Phase 2.
- 3.17 At paragraph 3.155 of his evidence Mr DeVenny comments that the B430 is a formal motorway diversion route for HGVs in instances when the M40 is closed and that the design of any mitigation scheme should take account of HGV movements, although Mr DeVenny acknowledges that these instances are 'infrequent'. The mitigation strategy is for minor changes to an existing signal-controlled junction and takes appropriate consideration of HGVs and, as such, I do not consider that the proposed mitigation strategy has any effect on the junctions' position on a HGV diversion route.
- 3.18 At paragraphs 3.154 to 3.157 of his evidence Mr DeVenny comments on HGV movements at the Middleton Stoney junction, both existing and associated with the Proposed Development. The Appellant has submitted a draft Construction Management Plan and a draft Delivery and Servicing Management Plan, both of which will be secured by Planning Condition. The routing of HGV during both the construction and operational phases can be controlled via the Construction Management Plan and the Delivery and Servicing Management Plan.
- 3.19 At Paragraph 3.159, Mr DeVenny states that "*the mitigation strategy is for a signalised junction, I would have expected that the traffic signals would actually have been shown*"
- 3.20 The mitigation strategy is for minor changes to an existing signal-controlled junction and not for a new junction. It is common practice that the siting and design of signal heads is progressed at the detailed design stage. It is evident that there is sufficient space to accommodate signal poles and the secondary signal head can be situated on the nearside footway beyond the primary signal, as would be common practice. Furthermore, a cranked pole could be used such that the signal pole could be situated at the back of the footway. This would also be common practice.
- 3.21 At paragraph 3.174 of his evidence Mr DeVenny asserts that:  
*"pedestrian facilities have been shown as uncontrolled crossing rather than being include as formula crossing within the traffic signal layout"*
- 3.22 As I have previously highlighted the mitigation strategy is for minor changes to an existing signal-controlled junction and are not for a new junction or changes to the form of control at the junction. Given that the junction is some 3.5km north-west of the Proposed Development, it is evident that the Proposed Development will not result in any change in pedestrian flows at the junction and, as demonstrated in my evidence, will not result in a significant change in vehicle movements at the junction.
- 3.23 The existing layout of the junction includes uncontrolled pedestrian crossing facilities on all arms of the junction. The mitigation works associated with the consented Heyford Park Phase 1 and Phase 2 schemes provide no improvements to pedestrian facilities at the junction and maintain uncontrolled pedestrian crossing facilities.
- 3.24 At present pedestrians are required to crossing the full width of the B430 in a single movement and, on the southern arm of the junction they are required to do this between queuing vehicles. The pedestrian refuge proposed as part of the mitigation works, seeks to improve the existing situation by enabling pedestrians to cross the B430 in two stages.

3.25 At paragraph 3.201 of his Evidence, Mr DeVenny states:

*"I note that the junction is configured with a cycle time of 180 seconds with the staging set to enable a 'double-cycling' of the B430 north and south arms. I suggest that this approach reflects the relative imbalance of highway demand on the B430 and relatively lower demands on the B4030. By implication, the minor arms (the B4030) appear to be called once every 360 seconds (six minutes). I would observe that for users of the B4030, this represents an unattractive an impractical cycle time. I would also observe that in the absence of a dedicated pedestrian stage, a cycle time of 360 seconds presents ambiguity to pedestrians who would reasonably expected crossing opportunities to present themselves more frequently."*

3.26 This is incorrect. The modelling has been assessed based on a modelled time period of 360 seconds and is based on analysis presented in the approved Heyford Park Phase 2 submission. The 360 second modelled time period represents three traffic signal cycles.

3.27 As part of the consented Heyford Park Phase 2 scheme it is proposed to introduce a bus gate on the western arm of the junction and this has the effect of significantly reducing the vehicle movements to and from the western B4030 arm of the junction.

3.28 The analysis presented in the recently approved Heyford Park Phase 2 submission concludes that, as a result of their proposed introduction of a bus gate on Heyford Road, there would be a significant reduction in traffic movements on that arm of the junction. On that basis the Heyford Road arm of the junction would not have sufficient traffic demand to warrant being called every cycle and would operate on-call with an estimated frequency of once every three cycles. In order for LinSig to model the on-demand operation of the Heyford Road arm of the junction a 360 second period has been modelled, representing three signal cycles. Two of the cycles include solely the B430 and B4030 Bicester Road stages, with the third cycle including all three stages.

3.29 The signal cycle time and staging presented alongside the current application is consistent with the approved Heyford Park Phase 2 proposals. No changes to the signal cycle time or staging are proposed as part of the current junction mitigation works.

3.30 In summary, the mitigation strategy is for minor changes to an existing signal-controlled junction and I do not agree with concerns raised by Mr DeVenny in relation to the mitigation scheme. The proposed mitigation scheme has been subject to a Stage 1 Road Safety Audit and the Safety Auditor's comments were the subject of a Designer's response and the Safety Auditor was content with the Designer's Response to the Safety Audit.

#### Evidence of Rupert Lyons on behalf of PAW

3.31 I have reviewed the evidence of Mr Lyons with regard to Reason for Refusal 3 and would make the following observations and corrections in addition to the points already contained in my main evidence.

3.32 At paragraph 5.15 of his evidence Mr Lyons refers to the swept path analysis of the B430/B4030 junction only having been undertaken for the movements between the east-west B4030 eastern and western arms of the junction.

3.33 This is correct. Swept path analysis was undertaken from the east-west B4030 movement as it this movement which could potentially be affected by the proposed pedestrian island which is included within the mitigation works, and it was requested for these movements only by OCC. The proposed mitigation works will not have a material effect on other movements at the junction and therefore swept path analysis of other movements is not necessary. Furthermore, as indicated at paragraph 3.8, I have undertaken additional swept path analysis of a bus undertaking the east-west B4030 movement. This is attached at [Appendix A](#) and demonstrates that the vehicle can manoeuvre appropriately through the junction with the proposed mitigation works in place.

3.34 At Paragraphs 5.37 and 5.38 of his evidence Mr Lyons asserts that the trip generation analysis and parking accumulation may underestimate vehicle trip and parking demand as a result of the proposed conferencing facilities at the site.

- 3.35 This assertion is incorrect. It has been demonstrated that the existing Great Wolf sites surveyed include comparable conferencing facilities to the Proposed Development and the surveyed sites had events taking place during the time of the surveys. It is evident that the trip generation analysis makes appropriate and robust consideration of the conferencing facilities at the site.
- 3.36 At paragraphs 5.41 and 5.42 of his Evidence Mr Lyons makes reference to the kerbed build-out facility that is located on the A4095 north of Chesterton, asserting that the Proposed Development may have an effect on the operation of the build-out and makes reference to a statement from OCC regarding the feature. However, the reference from OCC quoted by Mr Lyons ignores the following sentence of OCC's response, which states:

*"Peak evening total flows are approximately three-quarters of the morning flows, with the primary direction of travel reversed. As noted above, additional traffic associated with the development will tend to be mainly outside of the peak hours and will, therefore, not have a significant effect on the queuing at the build-out"*

- 3.37 It is evident that OCC has considered the effect of the Proposed Development on the traffic calming feature in Chesterton and has concluded that the Proposed Development will not have a significant effect on queuing at the build-out. This is a conclusion that I agree with.
- 3.38 Throughout his Evidence, Mr Lyons make numerous references to data from a Center Parcs site and asserts that our analysis and evidence relies on that data. He is incorrect in his approach. The trip generation presented within the Transport Assessment and agreed with OCC is based on surveys of existing Great Wolf Lodges and not data from any Center Parcs site. During pre-application discussions, and at the request of OCC, a sensitivity test was undertaken of the proposed trip rates. That sensitivity test was presented as Appendix H to the Transport Assessment, for completeness, and utilised some data from an existing Center Parcs site. The sensitivity test concluded that the proposed trip generation analysis, based on surveys of existing Great Wolf Lodges, provided a more robust analysis than the sensitivity test. Therefore, the sensitivity test does not form part of the analysis presented as to the trip generation anticipated for the proposed development, either in the Transport Assessment or in my proof of evidence.
- 3.39 At paragraph 6.28 of his evidence Mr Lyons states that raw data from the US surveys is not included within the submission documents, but no request was made for such raw data and it has now been provided to Mr Lyons anyway.
- 3.40 At paragraph 6.30 of his Evidence Mr Lyons assert that because people in the UK take more holidays than people in the USA, this could influence the trip attraction of the development. However, as detailed in my evidence, the trip attraction analysis has been based on surveys over a bank holiday week when resort would have been at peak occupancy and therefore could not accommodate additional guests. Furthermore, the sensitivity test that we undertook, which resulted in lower trips than the surveys of existing Great Wolf sites surveys, considered 100% occupancy of the hotel. Therefore, even if it is accepted that British people travel more that people in the USA, the hotel could not accommodate more guests at this time.
- 3.41 In paragraphs 6.58 to 6.71 of his evidence, Mr Lyons criticises the routeing assumptions that have been utilised within the Transport Assessment and asserts that drivers to the site will ignore any directional or regulatory signage and will rely solely on satellite navigation. I also note that there are numerous points within his evidence where Mr Lyon confirms that he currently acts as a transport consultant for Legoland in Windsor.
- 3.42 In this regard I would refer to a Transport Assessment prepared by Mr Lyons for development proposals at Legoland, where he discussed the signage strategy that is in place for Legoland and states that Legoland developed

*"an alternative routeing and signage strategy to LEGOLAND Windsor Resort to reduce congestion on the local and strategic highway network, specifically the Imperial Road/ St Leonards Road and St Leonards Road/ Clewer Hill Road junction to the north of the Application Site, by directing Park guests to other existing routes with more capacity"*

And

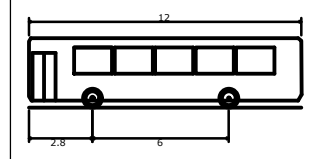
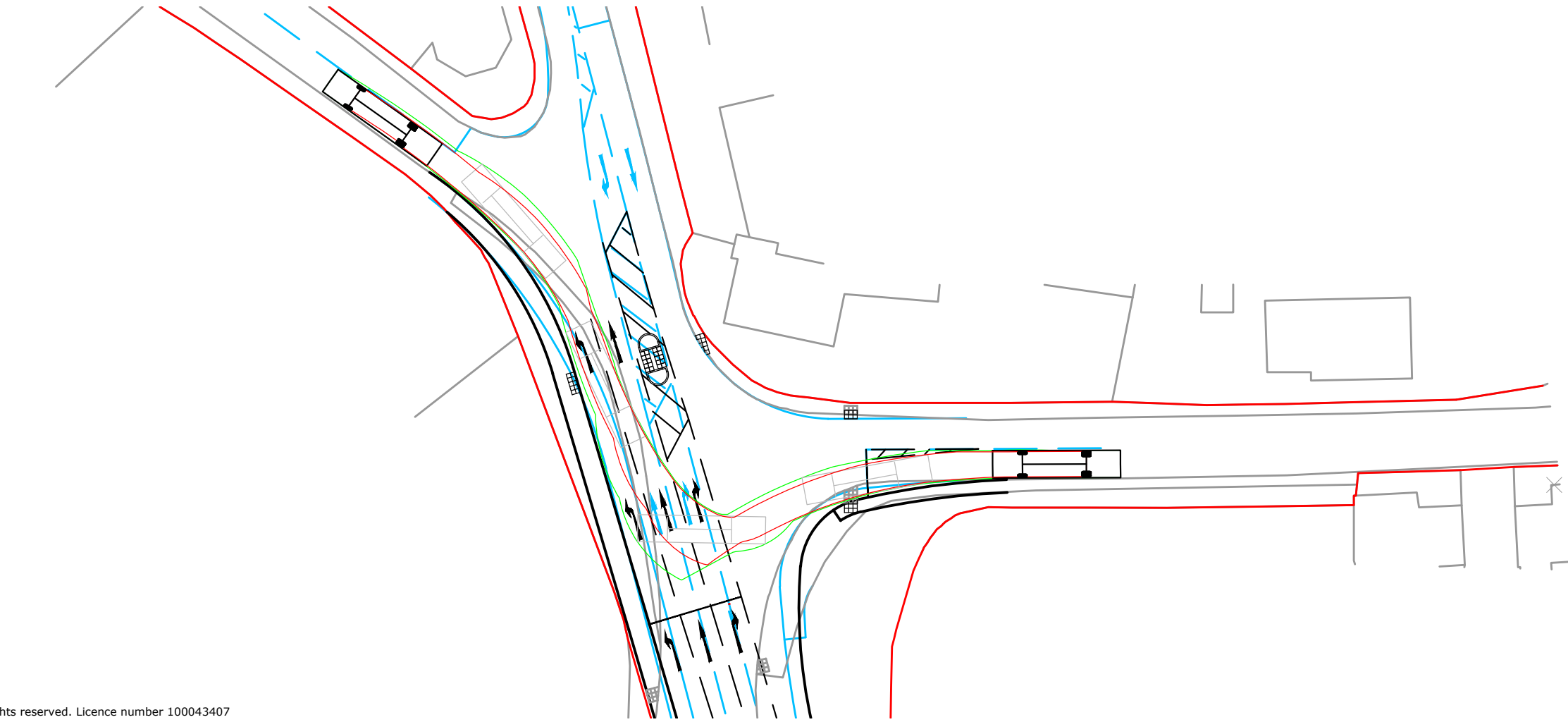
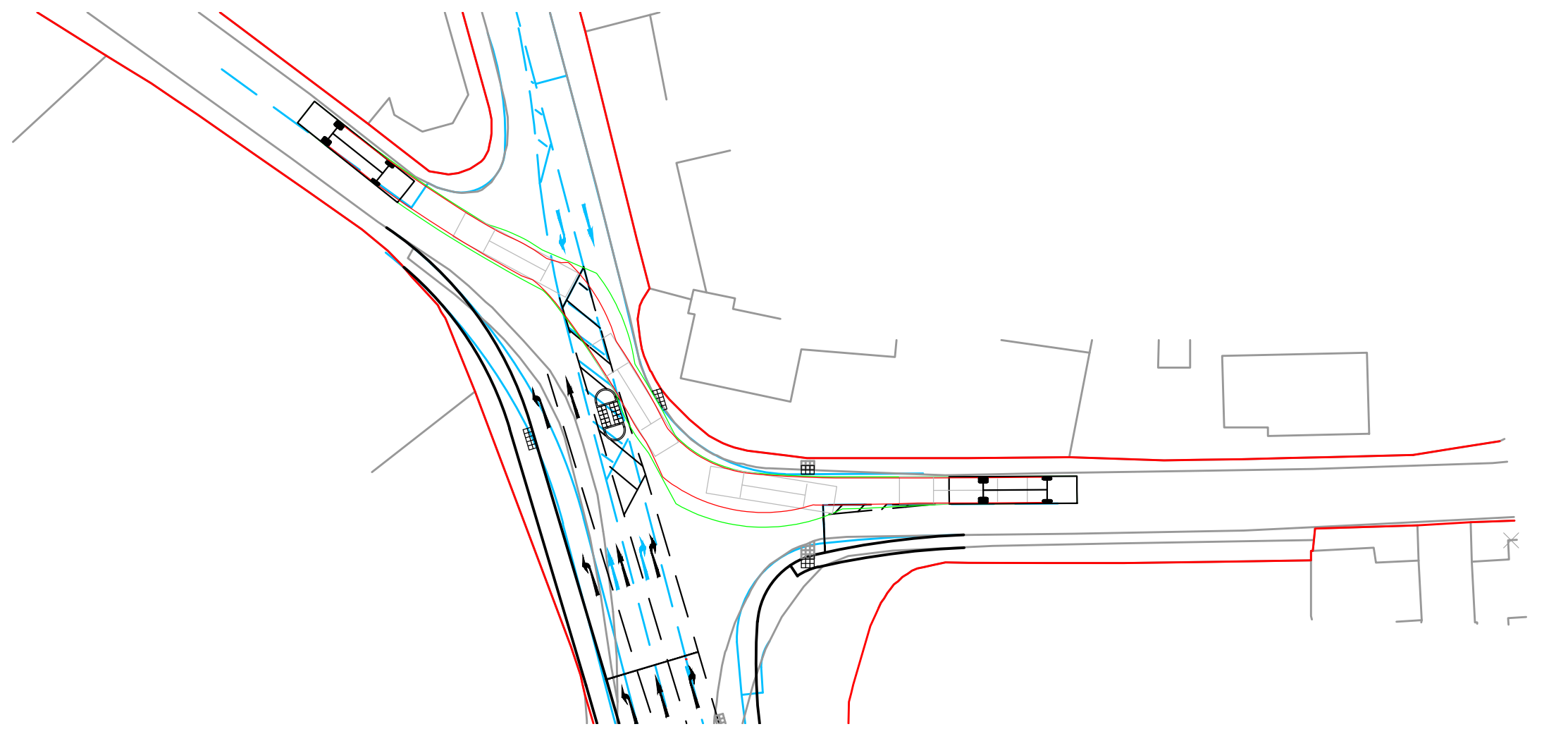
*“Following three successful trial periods between April and May 2014, the signage at the following points was implemented permanently for the August 2014 peak period (and retained subsequently);”*

- 3.43 It is evident that for his work for Legoland Mr Lyon clearly acknowledges that signage strategies do work and can impact driver routeing.
- 3.44 At paragraph 6.70 of his Evidence Mr Lyons asserts that the Transport Assessment does not include for sensitivity testing of alternative routeing assumptions. I do not consider this to be necessary and I would highlight that the routeing and distribution assumptions have been agreed with OCC. I also highlight that, if Mr Lyons considered that sensitivity testing is of importance, I would envisage that he would have presented such sensitivity testing within his own evidence. I refer back to my comments at paragraph 3.4 of this Rebuttal where I clarify that OCC are satisfied that the Proposed Development will not have an impact at junctions other than the B430/B4030 in Middleton Stoney, despite the lack of a sensitivity assessment that Mr Lyons is asserting is required.
- 3.45 As I have highlighted previously in my evidence, a significant proportion of trips associated with the Proposed Development, that are assumed in the distribution model, represent staff trips which would not be routeing through the Middleton Stoney junction but emanating from the main geographical source for employment, like Bicester itself. Whilst detailed sensitivity testing of alternative routeing assumptions for staff has not been undertaken, it is evident that there are no capacity concerns at other junctions and the change in trips would not be significant to result in any material impact.
- 3.46 I would highlight that, as I have detailed in paragraphs 3.20 to 3.26 above, my evidence demonstrates that the trip generation presented in the Transport Assessment is robust.

## Appendix A

### Swept Path Analysis

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'Standard' Rigid Bus	12.000m
Overall Length	2.550m
Overall Width	3.069m
Min Body Height	0.309m
Track Width	2.350m
Lock to lock time	4.00s
Wall to Wall Turning Radius	10.771m



84 North Street  
 Guildford  
 Surrey  
 GU1 4AU  
 T: 01483 531 300

Cargo Works  
 1-2 Hatfields  
 London  
 SE1 9PG  
 T: 020 8065 5208

[www.motion.co.uk](http://www.motion.co.uk)

Project:  
**Great Wolf Resort**

Title:  
**Swept Path Analysis  
 Standard Rigid Bus**

Scale: 1:500 (@ A3)

Drawing:  
**1803047-TK64**

Revision:  
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