

**TOWN AND COUNTRY PLANNING ACT 1990
THE TOWN AND COUNTRY PLANNING APPEALS (DETERMINATION BY
INSPECTORS) (INQUIRIES PROCEDURE) (ENGLAND)
RULES 2000 (AS AMENDED)**

Appeal by Great Lakes UK Limited

Proposed Great Wolf Lodge, Chesterton

Appeal Ref: APP/c3105/W/20/3259189

Erratum to Proof of Evidence

of

Alan DeVenny, Systra Limited

On matters relating to transport planning and traffic impacts

On behalf of Oxfordshire County Council acting as Highways Authority

05 February 2021

1. INTRODUCTION

- 1.1 This document is an erratum to the Proof of Evidence submitted by Alan DeVenny of Systra Limited in relation to Appeal reference APP/C3105/W/20/3259189. The Appeal, by Great Lakes UK Limited relates to the refusal of planning permission for the proposed Great Wolf Lodge development at Chesterton.
- 1.2 Following submission of my Proof of Evidence, I have established that Paragraph 3.4 contains an unintentional inaccuracy and that there are some further referencing later in the Proof of Evidence. I provide the necessary corrections and clarifications, as follows.

2. Error at Paragraph 3.4

- 2.1 Paragraph 3.4 of my evidence discusses the established access arrangements for the Bicester Hotel and Golf Spa (BHGS). The paragraph is quoted, as follows:

'It is proposed that the development would be accessed via a new priority junction onto the A4095. This access will be distinct from the existing access arrangements to the BHGS where access is taken from an established priority junction on the A4095. A preliminary design has been submitted for the new access onto the A4095 and this has been accepted in principle by OCC (i.e. subject to detailed design and delivery which can be secured by a planning condition or obligation).'

The second line of this paragraph incorrectly states that the existing main access to the BHGS is taken from an established priority junction on the A4095. This is incorrect; the established customer access to the BHGS is taken via Green Lane, to the south of the complex. While there is an established access on the A4095, use of that access is limited to service functions associated with the BHGS. '

3. Error at Paragraph 3.5

At para 3.5, I set out a summary of events and correspondence dates. I note at entry no. 30, I list the date as 4th October as the date of the Email from Motion to OCC seeking clarification from OCC on comments made in their previous consultation response. I can confirm that the stated date is incorrect and the correct date of that email was 14th October 2020.

I would also note, that there should be a further inclusion in the list as one further piece of correspondence was issued by OCC to Motion in December 2020. The entry should read:

32. 22nd December 2021: OCC email response to Motion in relation to Highway Safety Matters and Advance Direction Signage.

4. Error at Paragraph 3.117

4.1 Paragraph 3.117 of my Evidence introduces a variation to the Middleton Stoney junction mitigation scheme which is proposed by The Appellant. The paragraph is quoted, as follows:

‘The Great Wolf mitigation scheme has been developed in response to OCC’s concerns that the addition of development traffic would lead to an exacerbation of the junction capacity issues which have already been described. The Appellant’s revised mitigation scheme for the B430 / B4030 Middleton Stoney junction is indicated by **Drawing 1803047-revision A (included as Appendix D to this proof of Evidence)** which was submitted subsequent to the original Transport Assessment. ‘

4.2 My evidence incorrectly cross-refers to Appendix D in this instance when in fact the correct plan is contained in Appendix H. This being the case, the text contained in the second sentence of Paragraph 3.117 should read:

*‘The Appellant’s revised mitigation scheme for the B430 / B4030 Middleton Stoney junction is indicated by **Drawing 1803047-Revision C (included as Appendix H to this proof of Evidence)**...’.*

4.3 For the avoidance of doubt, the role of Appendices D and H are as follows:

- Appendix D: Motion Drawing 1803047-17 (Indicative mitigation works)
- Appendix H: Motion Drawing 1803047-17 Revision C (Revised mitigation works)

5. Error at Paragraph 3.183

5.1 In the third line of this paragraph, I note that Table 5.2 may be compared with Table 5.1. This is an error and the correct comparison would be between Table 5.3 and Table 5.1. The sentence within the paragraph would therefore read as follows:

'In that regard, Table 5.3 may be directly compared with Table 5.1 for the purposes of evaluating the benefits of the proposed Great Wolf mitigation prior to the addition of Heyford Park Phase 2 trips.'