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Your ref: C3105/W/20/3259189

Our ref: PAW/SoC

BY EMAIL ONLY: ALISON.DYSON@planninginspectorate.gov.uk

27th November 2020

Dear Ms Dyson

APPEAL REFERENCE: APP/C3105/W/20/3259189: LAND TO THE EAST OF M40 AND SOUTH OF A4095, CHESTERTON.

REDEVELOPMENT OF PART OF GOLF COURSE TO PROVIDE NEW LEISURE RESORT (SUI GENERIS) INCORPORATING WATERPARK, FAMILY ENTERTAINMENT CENTRE, HOTEL, CONFERENCING FACILITIES AND RESTAURANTS WITH ASSOCIATED ACCESS, PARKING AND LANDSCAPING

On behalf of my client, Parishes Against Wolf ("PAW"), which comprises Chesterton Parish Council with the support of adjoining Parish Councils of:

- Ambrosden
- Ardley with Fewcott
- Bletchingdon
- Charlton on Otmoor
- Chesterton
- Duns Tew
- Fritwell
- Godington
- Heyford Park
- Kirtlington
- Lower Heyford and Caulcot
- Middle Aston
- Middleton Stoney
- North Aston
- Somerton
- Steeple Aston
- Upper Heyford
- Wendlebury
- Weston on the Green

I write in objection to the above-mentioned proposals the subject of the planning appeal. I also write further to your letter of 6th November confirming Rule 6 status and request that this letter is read as the Statement of Case (SoC) for PAW. PAW intend to be represented at the appeal inquiry hearings and give oral evidence.

PAW has significant concerns, and objects in the strongest possible terms, to the proposals the subject of this appeal. Proposals which cover 18.6 hectares and include: nearly 48,000m² of new floor space; 902 car parking spaces; and 498 hotel bedrooms would dwarf the village of Chesterton. Moreover, this would place unacceptable pressure on the local road network and appear totally incongruous in the landscape. The proposals are simply out of scale and borne out of commercial opportunity rather than any properly planned imperative, or evidential need.

PARISHES AGAINST WOLF'S (PAW) CASE

PAW's case for objection to the proposals covers 5 main areas which are as follows:

1. the unsustainable location for the proposals;
2. its potentially severe highway effects;
3. the likely impacts on the local landscape, and character, of the area;
4. the loss of (at least) half of an existing and well established the golf club; and
5. failure to demonstrate compliance with national and local policies to protect and enhance biodiversity.

PAW (previously "The Parish Councils") objected to the original planning application – comments which can be read at Appendix A to this letter – and maintain their significant concerns. The Parish Councils have considered the decision notice issued by Cherwell District Council for the planning application (19/02550/F), and the subsequent materials submitted by the now appellants for this scheme.

PAW's starting point for its inquiry evidence will be section 70(2) of the Town and Country Planning Act 1990 and section 38(6) of the Planning and Compulsory Purchase Act 2004 which, read together, require that the appeals are determined in accordance with the Development Plan unless material considerations indicate otherwise.

The relevant Development Plan for these purposes comprises:

- The Adopted Cherwell Local Plan 2011-2031 (Part 1)
- The Adopted Cherwell Local Plan 2011-2031 (Part 1) Partial Review - Oxford's Unmet Housing Need
- Saved policies in the Adopted Cherwell Local Plan 1996

The site is not allocated for development in the Development Plan; to the contrary the site is protected for its sporting provision. PAW will draw on those policies in the Development Plan that are relevant to the appeals and will refer, in particular, to Policies BSC10, SLE1, SLE2, SLE3, SLE4, ESD1 ESD13 and ESD15, and Saved Policies T5, TR7 and C8. This will show that the proposed development would conflict with the Development Plan when considered as a whole, and the determination in accordance with the Development Plan would be to refuse permission. A development of the strategic scale proposed – as outlined above – should be considered through a Local Plan and through the plan-led system where constraints and opportunities can be fully considered, and alternatives assessed, rather than as speculative development through the appeal process.

In addition to the Development Plan, PAW will draw on national planning policy as set out in the National Planning Policy Framework ("the NPPF") and national planning guidance contained in the national Planning Practice Guidance ("the PPG") as material planning considerations. Material considerations will further indicate that planning permission should be refused.

Hereunder, each matter where PAW has an objection is set out in more detail. Further explanation will be given during the inquiry, supported by evidence to be submitted at least four weeks before the hearings.

The unsustainable location for the proposals

The proposal site is disconnected from Bicester and the M40. It is reached by minor roads through rural villages. There is no significant public transport service to the site, and it is some distance from the nearest

railway stations¹. PAW considers that this renders the appeal site isolated and that it amounts to an unsustainable location for the appeal proposal.

This matter relates directly to Cherwell Council's reason for refusal 2.

The NPPF sets out a general presumption in favour of sustainable development, and at paragraph 3 it says that it:

"should be read as a whole."

With regard the promotion of sustainable transport, paragraph 103 sets out that:

"Significant development should be focussed on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes."

The NPPF does not define the term significant development but the glossary (in Annex 2) defines non-residential major development as "additional floorspace of 1,000m² or more, or a site of 1 hectare or more". PAW considers reasonably, therefore, that the appeal proposal amounts to significant development.

In respect of the consideration of development proposals, paragraph 108 states that:

"it should be ensured that... appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location".

Policy SLE4: Improved Transport and Connections of the Cherwell Local Plan also states that:

"All development where reasonable to do so, should facilitate the use of sustainable modes of transport to make the fullest possible use of public transport, walking and cycling."

Policy ESD1 states that:

"Measures will be taken to mitigate the impact of development within the District on climate change.... Delivering development that seeks to reduce the need to travel and which encourages sustainable travel options including walking, cycling and public transport to reduce dependence on private cars."

This policy is echoed by the local Highway Authority (Oxfordshire County Council) in Policy 17 of the Local Transport Plan 2015-2031 (LTP4), which states that:

"Oxfordshire County Council will seek to ensure... that the location of development makes the best use of existing and planned infrastructure, provides new or improved infrastructure and reduces the need to travel and supports walking, cycling and public transport."

PAW considers that the appeal proposal does not accord with the national and local transport and land use planning policies outlined above. The development will generate a significant amount of travel, and by virtue of being situated in a rural, isolated and unsustainable location neither reduces the need to travel, nor reduces dependence on private cars.

Indeed, PAW notes from Table 2.3 of the Scoping Note Addendum (dated 9 July 2019) in Appendix H to the Transport Assessment (dated November 2019) that the Appellant's evidence base acknowledges that the car dependency of visitors to the appeal proposal is likely to be in the order of 98%.

At paragraph 5.2.4 of the Transport Assessment, the Appellant's evidence base identifies that the catchment area of the appeal proposal is defined as a 125-mile drive to the appeal site. PAW estimates that that distance corresponds to a drive-time isochrone of 2 hours and 7 minutes based on the average speed of traffic on the

¹ Bicester Village railway station (on the Oxford-Bicester Line) and Bicester North railway station (on the Chiltern Main Line).

United Kingdom's strategic road network. Applying that journey time to the available routes to the site by rail (and excluding the onward shuttle bus or taxi journey to the appeal site), PAW considers that only 4.56% of the catchment area (by square kilometres) is within a comparable rail journey time of the appeal site.

PAW notes that the proposals include the creation of a new footway between the site and Chesterton, along the A4095. However, it is unclear how this will encourage walking to/from the appeal site given the extent of the catchment area. Similarly, it is also considered highly unlikely that any visitors will cycle to the site, given the size of the catchment area and lack of dedicated cycling facilities on the A4095, as well as the likely need for luggage.

The Transport Assessment states that National Cycle Network Route 51 (NCN51) runs alongside the A41 Oxford Road south east of the site and is a traffic-free shared pedestrian and cycle route. This is not however correct; beyond the Bicester Avenue Home and Garden Centre, the route becomes an on-road route requiring cyclists to cycle alongside vehicular traffic. Considering the likely family nature of typical guest groups (typical room occupancy is 4.5 guests per room including children according to TA para 5.16), even if visitors were prepared to cycle to the site, the lack of cycle routes will discourage most groups from cycling.

The above places great importance upon the use of public transport to reduce dependency on private cars.

Turning to public transport, the appellants acknowledge that only one bus service operates per day between Chesterton and the site. This service is a one-way service and departs Chesterton at 07:25 (Monday-Friday). The absence of any bus service back to Chesterton and the infrequency of this one-way service are insufficient to serve a development of this scale. In this respect, the proposed shuttle bus from the site to Bicester Village and Bicester North railway stations could encourage visitors to travel by train.

However, in practice, the shuttle bus of unspecified size offers a poor, infrequent service and will do little to encourage sustainable travel. At a frequency of once every 2 hours (between 9.00am and 5.00pm (i.e. five services per day)), the shuttle bus is impractical and unattractive. Rather than encouraging the use of public transport, PAW considers that the additional travel-time penalty is likely to discourage those who would otherwise consider travelling by train. Those that do travel by train may have to wait considerable amounts of time at the station. It is unclear what would be done if the shuttle bus were full.

Considering the potential staff on site, and whilst a staff shuttle bus is also in theory positive, this is again considered unlikely to encourage any meaningful amount of sustainable travel, with similar issues to the visitor shuttle bus. With 460 FTE staff, a significant percentage of employees are likely to live outside of Chesterton, and Bicester. Working on a shift pattern, the staff shuttle bus is to be timed with the start/end of shifts (TA para 4.11). It is unknown whether this will also coincide with suitable train or other bus journeys for those commuting from outside of Bicester.

Again, it is possible that a very modest number of the anticipated 460 FTE staff may live in Chesterton itself (population 850 according to 2011 Census data) but, it is not considered that the previously considered footway will increase walking to/from the site to any meaningful degree.

Potentially severe highway effects

Chesterton village is served by minor roads, including Alchester Road and Green Lane. PAW considers that the character of the surrounding highway network is inconsistent with the character and type of roads required to support a scheme of the scale and nature of the appeal proposal. It is PAW's view that the cumulative impact of the appeal proposal would result in a severe and unacceptable transport impact on these roads.

This matter relates directly to Cherwell Council's **reason for refusal 3**.

At paragraph 108 of the NPPF it states:

“it should be ensured that... any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.”

Also, at paragraph 109 of the NPPF it states that:

“Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.”

Policy SLE4: Improved Transport and Connections of the Cherwell Local Plan states that:

“financial and/or in-kind contributions will be required to mitigate the transport impacts of development.”

It also clarifies the District Council's position that:

“development that is not suitable for the roads that serve the development, and which have a severe traffic impact will not be supported.”

Moreover, Saved Policy TR7 (Development attracting traffic on minor roads) states that:

“Development that would regularly attract large commercial vehicles or large numbers of cars onto unsuitable minor roads will not normally be permitted.”

PAW considers that the Appellant has under-estimated the traffic attractiveness of the appeal proposal such that the car parking accumulation assessment described in paragraph 4.16 of the Transport Assessment and provided in Appendix E to that report is unreliable. Similarly, that the capacity analyses summarised in Section 6 of the Transport Assessment and provided in Appendix J to that report are equally unreliable because they are predicated on an unrealistic assessment of both the quantum and assignment of traffic that will be attracted to the appeal proposal.

PAW notes also that the appeal proposal includes for the provision of conferencing facilities which they consider may well interact with the proposed hotel accommodation and restaurant facilities but that are likely to attract traffic that is unrelated to the proposed waterpark and family entertainment centre. No effort has been made in the Appellant's evidence base to account for such additional trips and the consequential additional demand for car parking or impact on the adjacent public highway network.

With regard to the likely trip attraction of the appeal proposal, PAW does not accept that the Appellant's proxy sites in California, North Carolina and Texas in the United States of America are acceptable, especially noting that in the Appellant's presentation to the District Council on 5 February 2019, and with reference to vacation patterns, it noted that families in the United Kingdom take 19% more trips annually than families in the United States of America. No effort is made in the Appellant's evidence base to consider the implication of that on the application of foreign data, nor the effect of other transport related characteristics may have on the number and profiles of trips to and from the appeal proposal.

For those reasons, PAW considers that a *first principles* based analysis of the likely traffic attraction of the appeal proposal is likely to provide a more reliable assessment. It does not accept the findings of the 'First Principles Sensitivity Test' provided in the Scoping Note Addendum: Trip Generation Analysis provided at Appendix H to the Transport Assessment as being reliable because it remains predicated on data from the United States of America (in respect of the expected hotel and room occupancy rates, and average durations of stay (paragraph 2.9 refers)).

It is PAW's view that such an analysis should be based on the following combination of factors:

1. the capacity of the hotel element and the occupancy rate (accounting for a blend of overnight and day visitor groups);

2. the capacity (and likely occupancy) of the hotel rooms;
3. the average duration of stay of visitors to the appeal proposal (accounting for the likely overlap of guests checking-out of the hotel accommodation but remaining at the appeal proposal and using the facilities after subsequent guests have arrived (noting that that will also give rise to a consequential increase in demand for car parking));
4. the number of staff to be employed at the various facilities within the appeal proposal;
5. the likely arrival and departure profiles of visitor and staff trips to and from the appeal proposal;
6. the car dependency (whether as a car driver or passenger) of the catchment area of the appeal proposal for both visitors and staff; and
7. the average occupancy of car trips to and from the appeal proposal for both visitors and staff.

Such a methodology would provide the basis for determining realistic arrival and departure profiles for visitor and staff vehicles that would form a suitable basis for the calculation of the likely demand for parking at the appeal proposal in order to verify the adequacy of the car parking provision proposed, and enable a proper assessment of the impact of the additional traffic that will be attracted to the appeal proposal not only on the junctions identified in the Transport Assessment but, also, enable consideration of the alternative routes that are available to visitors to avoid congestion hotspots on the public highway network. In that respect, PAW is acutely aware that modern satellite navigation systems operate dynamically such that visitors to the appeal proposal are likely to be diverted away from congestions hotspots (such as at the traffic signal controlled junction of the B430 and the B4030 in Middleton Stoney which the Appellant's evidence base demonstrates is excess of its theoretical capacity by some considerable margin (Table 6.13 in the Transport Assessment refers)) resulting in southbound visitor traffic (in addition to northbound visitor traffic) routeing to the appeal proposal via Junction 9 of the M40, and via the A41 or the A34 and inappropriate rural routes.

It is PAW's view, that the application of reasonable traffic attraction and assignment assumptions will demonstrate that the appeal proposal provides an inadequate quantum of car parking to satisfy the demand for car parking within the curtilage of the appeal site, and that the residual cumulative impact upon the adjacent public highway network will be severe and give rise to rational highway safety concerns in the context of paragraph 109 of the NPPF.

The likely impacts on the local landscape, and character, of the area

PAW considers the proposals to be incongruous, excessive, and certainly out of place in a rural landscape typified by rolling countryside and small villages. Moreover, the proposals disregard the Cherwell Local Plan Strategic Objective 12, which is very clear (with my emphasis):

"...development will be focussed in Cherwell's sustainable locations, making efficient and effective use of land, conserving and enhancing the countryside and landscape and the setting of its towns and villages."

This matter relates directly to Cherwell Council's **reason for refusal 4**.

The NPPF at paragraph 170 which recognises that:

"Planning policies and decisions should contribute to and enhance the natural and local environment by... recognising the intrinsic character and beauty of the countryside..."

The settlement of Chesterton has a distinct rural character which should be protected and enhanced. Policy ESD13: Local Landscape Protection and Enhancement sets out a range of factors that would limit the approval of development proposals in respect of settlement character, including the following:

- *The proposal is inconsistent with local character*
- *The proposal would harm the setting of settlements*
- *The proposal would harm the historic value of the landscape.*

Policy ESD 15: The Character of the Built and Historic Environment, meanwhile, sets out other criteria for new development proposals as follows:

- *Development of all scales should be designed to improve the way an area functions*
- *Support the efficient use of land and infrastructure, through appropriate land uses, mix and density/development intensity*
- *Contribute positively to an area's character and identity by creating or reinforcing local distinctiveness and respecting local topography and landscape features, including skylines, valley floors, significant trees, historic boundaries, landmarks, features or views, in particular within designated landscapes, within the Cherwell Valley and within conservation areas and their setting*

The appellant contends that the effects of the proposal on the landscape are negligible and can be mitigated where necessary. PAW is unconvinced by these arguments.

Reason for Refusal 4 sets out clearly the Council's concerns with regard to character and appearance. PAW will address how the proposed development would be unacceptably harmful to the character and appearance of the area with regard to a number of specific aspects.

That the proposed development by virtue of its considerable size, scale and massing, location in the countryside, institutional appearance, incongruous design, levels of activity will cause significant urbanisation and as a consequence, unacceptable harm to the character of the local landscape and its appearance with the scheme in place. These effects will have an unacceptable detrimental bearing upon the rural setting of the village of Carterton as well as the amenities enjoyed by the users of public rights of way and highways in the locality.

Size, Scale and Massing

PAW will by reference to the application drawing comment upon the size, scale and massing of the resort complex to explain how it is completely disproportional to any built complex found locally in the open countryside and as such would be out of scale and keeping for its locality.

Location in the Open Countryside

PAW will by reference to plans explain how it is inappropriately located being situated in the countryside beyond settlement limits. Again, emphasizing that it is out of keeping with the character and materially harmful in this regard.

Appearance, Design and Activity causing urbanisation

Analysis of the design will explain how the complex would be incongruous and institutional in appearance such that it would be unacceptably harmful in terms of appearance where seen, compounded by the associated activity levels with the resort.

Local Landscape Character

PAW will refer to the various published Landscape Character Assessments that relate to the area, noting the key characteristics that collectively define the character of the local landscape and by reference to this explain how the proposal would be out of keeping and materially harmful to the perceived character of the area.

General Visual Amenity

PAW will undertake analysis to demonstrate how the proposal would have an unacceptable harmful effect upon the general visual amenity of the area with particular regard to publicly accessible locations, namely rights of way and highways in the area.

Local Distinctiveness

Local distinctiveness is defined by the character of an area and gives it sense of place. PAW will explain how the proposal would significantly undermine the local distinctiveness of the area.

Rural Setting of the Village

Chesterton is the nearest village to the proposal. PAW will explain how the proposal will affect the setting of this settlement from a landscape and visual perspective.

The loss of (at least) half of an existing and well established the golf club

PAW is of the view that the potential loss of half of this facility is deeply concerning; would reduce opportunities for improved health and wellbeing; result in a loss of active engagement in sport; and, moreover is inappropriate in an area which would have a deficit if the development is allowed to go ahead.

This matter relates directly to Cherwell Council's **reason for refusal 1**.

The NPPF at paragraph 97 suggests that:

Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or*
- b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or*
- c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.*

Furthermore, Policy BCS10 of the Cherwell District Local Plan states that the Council will ensure sufficient quality and quantity of open space, sport and recreation provision by protecting existing sites and enhancing current provision. It goes on to state that the Council will be guided by evidence base and will consult parish councils together with potential users to ensure the provision meets local needs.

The accompanying text to Local Plan policy BCS10, at paragraph B.157, reports that:

responsibility for provision of open space and recreation facilities in the district is shared between the councils, private sports clubs (such as Bicester hotel golf and spa) and associations and requires partnership working.

Paragraph B.158 continues:

The Districts PPG17 Open Space Sport and Recreational Facilities Needs Assessment, Audit and Strategy 2006 and the subsequent Green Spaces and Playing Pitch Strategies 2008... highlighted the need to protect all sites identified in the audit to ensure an adequate supply of open space provision.

Chesterton golf course is in the green spaces strategy 2008, and therefore identified for protection. PAW is of the view that this demonstrates the continued need for the facility contrary to the assertions of the applicant.

PAW is also concerned that the loss of nine holes from the golf course risks a drop in player interest, and therefore puts at risk the viability of the entire course, not just those holes proposed for development.

Failure to demonstrate compliance with national and local policy on biodiversity

PAW has sought independent expert advice on whether the Appellant's claims of net gain in biodiversity are robust and the outcome of that process has galvanised their serious and fundamental concerns about the

appellant's approach to understanding and assessing the biodiversity impacts of the proposals, especially in terms of aiming to avoid net loss of biodiversity and achieve net gain in accordance with national and local planning policy.

The baseline assessment of the site appears to artificially depress the value of the existing habitats resulting in skewed inputs to the biodiversity calculator submitted by the Appellants to demonstrate net gain. The outputs from the calculator are then further skewed by committing to highly ambitious to the point of unrealistic habitat creation proposals, the delivery of which presents significant technical and future management challenges which are neither acknowledged nor addressed.

The compounding effect of these two sources of bias is to suppress the impact significance of habitat losses occasioned by the proposals while exaggerating the positive effects. There also appear to be fundamental numerical errors and oversights in the Appellant's use of the calculators. Full independent correction of these errors is currently hampered by an absence of transparency in the Appellant's submitted material. Therefore, the Appellant is requested to make available to PAW, and in advance of the inquiry, a fully interactive copy of its completed biodiversity calculator spreadsheet. This will assist with full and complete resolution of the position and to further particularise and narrow any grounds of dispute arising. This will also avoid unnecessary use of inquiry time.

At this stage however, independent review indicates that the proposals will not achieve the net gain figures that are claimed, nor indeed the 10% net gain benchmark adopted by Cherwell District Council in October 2019² in line with the Environment Bill. Indeed, net loss is indicated, which indicates that the proposals fail to comply with national planning policy (e.g. NPPF paras 170 and 175) and *inter alia* adopted local plan policy ESD10.

PAW notes that this is not a reason for refusal in this case however, as the appellants have failed to adequately set out how the development can be mitigated to avoid adverse impacts on biodiversity, this raises matters of compliance with national and local planning policies that are fully germane to the disposal of this Appeal.

Other matters

PAW remains acutely concerned about the increased flood risk which the proposals pose. The NPPF at paragraph 155 states:

"Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas of the highest risk, they should consider the cumulative impacts in or affecting local areas susceptible to flooding."

PAW notes correspondence between the Lead Local Flood Authority (Oxfordshire County Council) and appellants (dated 18 February 2020) in which it states:

"Discharge via ditched to Wendlebury Brook. Discharge to be in third party land to the south of the proposed site"

PAW supports the decision of Cherwell District Council to refuse the application on the basis that the applicants drainage proposals are site specific and the mitigation works proposed by the applicant will not address the flooding risk to both Little Chesterton and Wendlebury.

PAW also has significant concerns about the approach that the appellants took to early engagement with stakeholders regarding its proposals. The NPPF at paragraphs 39 and 40 sets out that:

²http://modgov.cherwell.gov.uk/documents/s42079/250919%20FINAL%20October%20Executive%20Committee%20report_Community%20Nature%20Plan.pdf

“Early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality preapplication discussion enables better coordination between public and private resources and improved outcomes for the community.

Local planning authorities have a key role to play in encouraging other parties to take maximum advantage of the pre-application stage. They cannot require that a developer engages with them before submitting a planning application, but they should encourage take-up of any pre-application services they offer. They should also, where they think this would be beneficial, encourage any applicants who are not already required to do so by law to engage with the local community and, where relevant, with statutory and non-statutory consultees, before submitting their applications.”

PAW will demonstrate that this advice has not been followed by the appellants. Meaningful engagement did not take place with the Parish Councils or the Golf Club. The result is proposals which fail to pay proper regard to local character or consider the role that the sport of golf or the club plays in the local community.

Conclusion and the planning balance

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that proposals be determined in accordance with the development plan unless material considerations indicate otherwise.

PAW will set out in evidence – as summarised above – that the proposal would cause harms as follows:

- (i) to the principles of achieving sustainable development;
- (ii) to the capacity of the local highway network
- (iii) to the local landscape and character of the area; and
- (iv) the loss of golfing facilities

While it is noted that biodiversity matters are not a reason for refusal in this case, PAW also contends that the proposals fail to demonstrate compliance with national and local policies seeking to avoid net loss of biodiversity and secure net gain where possible.

PAW accepts that the proposals have the potential to bring some economic benefit and provide jobs. These matters will carry material weight. However, other social benefits remain unclear and environmental benefits unjustified without the further evidence requested above. In no way would these benefits outweigh the substantial impacts of the proposal.

PAW has set out above – and will amplify in evidence – how the proposals are contrary to the Development Plan, in particular to Policies: BSC10, SLE1, SLE2, SLE3, SLE4, ESD1, ESD13 and ESD15, and Saved Policies T5, TR7 and C8.

Moreover, the proposals are also contrary to the NPPF at paragraphs 97, 103, 108, 109, 170 and 175.

The planning balance will be set out in full in PAW’s planning proof of evidence. However, taking account of conflict with local plan policies and the potential for adverse impacts it is not considered that the benefits of the scheme, taken individually or cumulatively, clearly outweigh the harms such that they justify the grant of permission. It follows that material considerations do not justify the grant of permission for a development which is in breach of the development plan.

Furthermore, it is reiterated that development of this strategic scale is better considered through a Local Plan and the plan-led system where constraints and opportunities can be fully considered, and alternatives assessed.

For the reasons set out above PAW respectfully suggests that the appeal should be dismissed.

Yours sincerely,



Peter Canavan BA(Hons) MSc MRTPI

Associate Partner



APPENDIX A: THE PARISH COUNCILS' OBJECTIONS TO PLANNING APPLICATION: 19/02550/F

Foreword

Chesterton Parish Council response to

Planning Application No: 19/02550/F Great Lakes (UK) Ltd

The Parish Council unconditionally objects to this development proposal and urges the Planning Officer to recommend refusal of the planning application to the Planning Committee of Cherwell District Council.

The Council objects strongly on grounds of lack of sustainability, with the proposal being against both the adopted Local Plan and NPPF guidelines. These points are outlined in detail in the commissioned reports. The Council holds the view that to put forward a proposal in such an unsustainable location is ill conceived and unjustified.

If the Planning Committee were to support this proposal the Parish Council would expect significant S106 investment in the local infrastructure and road network both locally and sub-regionally and would wish to be included in any transport consultation to ensure that travel plans are implemented effectively.

In addition the Parish Council would want to see contributions to village improvement issues to include:

- (a) Improving the energy efficiency of both the Community Centre & Village Hall along 'low carbon' lines.
- (b) Electric charging points adjacent to the Community Centre.
- (c) Extension to the existing kitchen in the Community Centre.
- (d) An extension to the Sports Pavilion to house necessary equipment and an extension to the Car Park, necessitating land purchase
- (e) The conversion of the Annex to create storage, an archival centre and an internet cafe.
- (f) Increased recreational activities to include a bowling green and tennis courts, necessitating land purchase [as in (d)]
- (g) The creation of a kitchen and toilet facilities in the Church
- (h) Improved signage to village amenities.
- (i) A contribution to the management & maintenance costs of the above.

However we reiterate our strong objections to this development proposal within our parish.

Philip J Clarke

Chair, Chesterton Parish Council

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By email

Clare.whitehead@cherwell-dc.gov.uk

Your ref:

Our ref:

29 January 2020

Dear Ms Whitehead,

Planning application: 19/02550/F – Land to the east of M40 and south of A4095, Chesterton.

Redevelopment of part of golf course to provide new leisure resort (sui generis) incorporating waterpark, family entertainment centre, hotel, conferencing facilities and restaurants with associated access, parking and landscaping

1.0 Introduction

1.1 Carter Jonas LLP has been instructed by Chesterton Parish Council with the support of adjoining Parish Councils of Weston on the Green, Middleton Stoney, Ardley with Fewcott, Wendlebury, Piddington, Kirtlington, Bletchingdon, Bucknell, Fringford, and Ambrosden (“the Parish Councils”).

1.2 The Parish Councils wish to object to the principle of the above listed proposals and are concerned that the application does not take proper account of development plan policies, nor national policy, and neither does it provide proper justification. The Parish Councils’ main concerns are the negative landscape impacts of the proposed development and the significant negative traffic impacts on the surrounding areas. The Parish Councils also note deficiencies with the submitted information in support of the planning application which are detailed through these objections.

1.3 The Parish Councils are also supported in their objections by Victoria Prentis, MP for North Oxfordshire. A letter detailing this support is at **Annex A** to this letter.

1.4 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 agricultural fields and the landscaped ‘Bignall Park’ to the north.

1.5 To date, the Parish Councils have engaged with the applicants through local consultation exercises and have raised fundamental concerns, which they consider to remain unresolved, including:

- the loss of half of an existing and well established the golf club with strong links to the parish council;
- whether there is any evidential need for such a holiday resort in the area, and what benefits it would bring;
- the likely landscape impacts of the proposals;

- how the proposals will be out of character with the locality; and
- the severe transport impacts that the proposals would bring.

1.6 This objection has been compiled with input from transport consultants (Paul Basham Associates) and landscape consultants (Applied Landscape Design Limited) also appointed by the Parish Councils (technical assessments can be seen at **Annexes B and C**).

1.7 The following is a review of the policy context for the proposals, its harms and reported benefits and the conclusion that the development does not represent sustainable development, and moreover the purported benefits cannot be considered sufficient to outweigh the harms to allow for a permission that is contrary to the adopted Local Plan.

2.0 Planning Policy

2.1 To provide some context to these objections, outlined hereunder is the policy framework against which the proposals will need to be assessed.

Cherwell Local Plan 2011-2031 Part 1 (Adopted 20th July 2015)

2.2 The Cherwell Local Plan explains at paragraph A.29:

“...that sustainable development is about change for the better. It is about positive growth, making economic, environmental and social progress for this and future generations. To achieve sustainable development, economic, social and environmental gains should be sought jointly.”

2.3 Paragraph 1.9 of the local plan affirms that Bicester and Banbury are the most sustainable locations for growth, with the plan seeking to strengthen the role of the towns as the centre of the local economy set within a “rural hinterland”.

2.4 At policy SLE3: Supporting Tourism Growth; Cherwell District Council (CDC) has identified a clear demand for hotel provision in the county. The policy references the demand and sets out that proposals for new or improved tourist facilities that increase overnight stays, will be supported within the District, provided they are in *sustainable* locations.

2.5 The local plan contains various strategic development areas at Bicester, as a strategy to promote growth. Three of the strategic development areas include hotels as part of the expected leisure provision requirements:

- South West Bicester Phase 2 (Policy Bicester 3)
- Bicester Business Park (Policy Bicester 4)
- Former RAF Bicester (Policy Bicester 8)

2.6 Chesterton, by comparison, is identified as a Category A Village (Policy Villages 1) which would be suitable for minor development, infilling and conversions.

2.7 Chesterton village is served by minor roads, including Alchester Road and Green Lane. Policy SLE4: Improved Transport and Connections states that financial and/or in-kind contributions will be required to mitigate the transport impacts of development. It also

clarifies that development that is not suitable for the roads that serve the development, and which have a severe traffic impact will not be supported.

2.8 Policy ESD1 sets a general context to mitigate and adapt to climate change. The policy is to balance the needs for growth against their direct impacts and effects on the environment and especially the climate. This policy reiterates the importance of locating development in sustainable locations; promotes sustainable construction techniques; and, seeks the use of resources more efficiently, including water.

2.9 Turning specifically to the efficient use of water Policy ESD8 sets out that the Council will seek to maintain water quality, ensure adequate water resources and promote sustainability in water use.

2.10 The settlement of Chesterton has a distinct rural character which should be protected and enhanced. Policy ESD13: Local Landscape Protection and Enhancement sets out a range of factors that would limit the approval of development proposals in respect of settlement character, including the following:

- *The proposal is inconsistent with local character*
- *The proposal would harm the setting of settlements*
- *The proposal would harm the historic value of the landscape.*

2.11 Chesterton Conservation Area encompasses most of the village. Policy ESD15: The Character of the Built and Historic Environment sets out criteria for new development proposals that could potentially impact on such areas:

- *Development of all scales should be designed to improve the way an area functions*
- *Support the efficient use of land and infrastructure, through appropriate land uses, mix and density/development intensity*
- *Contribute positively to an area's character and identity by creating or reinforcing local distinctiveness and respecting local topography and landscape features, including skylines, valley floors, significant trees, historic boundaries, landmarks, features or views, in particular within designated landscapes, within the Cherwell Valley and within conservation areas and their setting*

2.12 Policy BSC10: Open Space, Outdoor Sport and Recreation Provision states that – amongst other measures – the Council will ensure that enough quantity and quality of, and convenient access to open space, sport and recreation provision will be secured through protecting existing sites.

2.13 In the accompanying text at paragraph B.159 further detail is provided as follows:

Development proposals that would result in the loss of sites will be assessed in accordance with guidance in the NPPF and NPPG, and will not be permitted unless the proposal would not result in the loss of an open space of importance to the character or amenity of the surrounding area, an assessment has been undertaken which demonstrates that the site is surplus to requirements including consideration of all functions that open space can perform, or the Council is satisfied that a suitable alternative site of at least equivalent community benefit in terms of quantity and quality is to be provided within an agreed time period.

- 2.14 Policy ESD 15: The Character of the Built and Historic Environment, meanwhile, sets out other criteria for new development proposals as follows:
- *Development of all scales should be designed to improve the way an area functions*
 - *Support the efficient use of land and infrastructure, through appropriate land uses, mix and density/development intensity*
 - *Contribute positively to an area's character and identity by creating or reinforcing local distinctiveness and respecting local topography and landscape features, including skylines, valley floors, significant trees, historic boundaries, landmarks, features or views, in particular within designated landscapes, within the Cherwell Valley and within conservation areas and their setting*
- 2.15 Finally, through its policy ESD 17: Green Infrastructure, CDC seeks to maintain and enhance the green infrastructure network through:
- *Pursuing opportunities for joint working to maintain and improve the green infrastructure network*
 - *Protecting and enhancing existing sites and features forming part of the green infrastructure network*
 - *Ensuring that green infrastructure network considerations are integral to the planning of new development*

Cherwell Local Plan 1996 Saved Policies

- 2.16 The application site currently sits outside of the built-up limits of Chesterton. The site is therefore deemed to be in open countryside. Saved Policy T5 suggests that development proposals in this location must either:
- i) Be largely accommodated within existing buildings which are suitable for conversion or for such use, OR
 - ii) Totally replace an existing commercial use on an existing acceptably located commercial site.
- 2.17 The explanatory text for Policy T2 states that large establishments will generally be unacceptable in smaller villages. It also clarifies that the Council supports the provision of new hotel, motel, guest houses and restaurants within settlements, provided that the nature of the proposed development is compatible with the size and character of the settlement and there are no adverse environmental or transportation affects resulting from the proposal.
- 2.18 Saved Policy TR7 sets out that development that would regularly attract large commercial vehicles or large numbers of cars onto unsuitable minor roads will not normally be permitted.
- 2.19 Saved Policy C8 clarifies that sporadic development in the open countryside will generally be resisted. The accompanying text for the policy includes that development in the countryside must be resisted if its attractive, open, rural character is to be maintained. It also states that Saved Policy C8 will apply to all new development proposals beyond the built-up limits of settlements.

National Planning Policy Framework (NPPF)

2.20 Paragraph 8 of the NPPF outlines that:

“Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):

a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;

b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and

c) an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.”

2.21 Paragraph 11 of the NPPF, of course, requires that local plans and planning decisions should apply the presumption in favour of sustainable development.

2.22 Regarding rural enterprise and development, the NPPF includes the following text at paragraphs 83 and 84:

83. Planning policies and decisions should enable:

a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings;

b) the development and diversification of agricultural and other land-based rural businesses;

c) sustainable rural tourism and leisure developments which respect the character of the countryside; and

d) the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.

84. Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport). The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist.

2.23 Where leisure proposals are to be considered by a planning authority the NPPF offers the following direction at paragraphs 89 and 90:

89. When assessing applications for retail and leisure development outside town centres, which are not in accordance with an up-to-date plan, local planning authorities should require an impact assessment if the development is over a proportionate, locally set floorspace threshold (if there is no locally set threshold, the default threshold is 2,500m² of gross floorspace). This should include assessment of:

- a) the impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal; and
- b) the impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and the wider retail catchment (as applicable to the scale and nature of the scheme).

90. Where an application fails to satisfy the sequential test or is likely to have significant adverse impact on one or more of the considerations in paragraph 89, it should be refused.

2.24 Also, of relevance to this proposal is paragraph 98 which requires:

“Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails.”

2.25 Paragraph 103 of the NPPF which sets out that:

“significant development should be focussed on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.”

2.26 Paragraphs 148 and 149 which outlines the role of the planning system and planning decisions in engaging with the challenges of climate change including:

“...Shap[ing] places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy...”

“...taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures...”

2.27 And paragraph 170 which recognises that:

“Planning policies and decisions should contribute to and enhance the natural and local environment by... recognising the intrinsic character and beauty of the countryside...[and] minimising impacts on and providing net gains for biodiversity...”

3.0 The proposed development

3.1 The proposal is for the development of a large hotel and leisure complex in the countryside. It will involve the loss of (at least) half an active golf course and will have an effect the local transport network, the landscape character and the built and historic environment. The proposed location, and its relative sustainability is considered hereunder as are the other

impacts. The suggested benefits of the scheme are also considered. In summary, the Parish Councils are not convinced that the purported benefits are sufficient so as to outweigh the significant harms to allow for a proposal that is contrary to the policies of the adopted plan.

Sustainable location

- 3.2 The term 'sustainable location' is not defined in the local plan with regards to tourism development. The applicant has created a definition to suit the proposals. The Parish Councils consider that this disregards the CDC identification of sustainable locations – i.e. at Banbury and Bicester – as preferred locations for growth. Moreover, this disregards Strategic Objective 12 of the local plan, which clarifies the following (with our emphasis):

“...development will be focussed in Cherwell’s sustainable locations, making efficient and effective use of land, conserving and enhancing the countryside and landscape and the setting of its towns and villages.”

- 3.3 The applicant has stated in the submitted planning statement at point 6.37, that due to the site’s close proximity to Bicester and the proposed public transport links, that the site is viewed as being in a sustainable location. The applicant also refers to the site being ‘on the edge of a growth settlement’ at 6.40 in the planning statement, referring to Bicester as a growth settlement identified by CDC. This ignores the clear separation of Bicester and Chesterton as two distinct settlements, in order to appear compliant with policy SLE3.
- 3.4 Furthermore, the proposed development does not comply with saved policy T5. There are no buildings on the proposed development site and the development cannot therefore be accommodated within converted existing buildings, as required by criterion (i). The Parish Councils also question whether the proposals are capable of complying with criterion (ii) of policy T5. Notwithstanding that the Parish Councils are very concerned at the potential loss of all or part of an important local sporting facility; the proposed development site only contains half of the current golf course at Bicester Hotel, Golf & Spa. Therefore, only half of the current existing commercial use would be replaced and for this proposal to be policy compliant, it ought to “totally replace” what is currently in place
- 3.5 The Parish Councils also note that the current use of the site is for playing golf that has a very limited landscape impact. Whilst golf is a ‘commercial use’ (save for the clubhouse which is not within the application area) there is no built form on the site. The proposal is not for the redevelopment of an industrial estate for example, where to replace large industrial “sheds” with a large hotel complex might be less intrusive.

Transport Impact

- 3.6 At paragraph 6.83 of the planning statement the applicant has asserted that:
- “...Detailed junction capacity analysis demonstrates that the proposed site access junction from the A4095 will operate within capacity with negligible queuing or vehicle delay. Furthermore, the Proposed Development will not have a material effect on the operation on junctions on the local highway network.”*
- 3.7 However, Paul Basham Associates (PBA) has considered the transport evidence that has been submitted, and the proposed transport strategies and drawings. PBA has identified some methodological errors in work and drawings which give rise to serious questions about

the accuracy of what is claimed. The full response from PBA can be seen at **Annex B** to this letter but it has concluded that it has:

“...serious concerns with regards to the sustainability of the proposed development and its impact on the local road network. We do not believe that the measures put forward by the applicant are sufficient to overcome the inherently unsustainable location for this type of development. A negligible proportion of staff or visitors are likely to walk or cycle, and the proposed shuttle bus is not sufficiently attractive to encourage a significant amount of site users to travel by public transport. We also have concerns relating to the calculation of trip generation which in turn has informed the level of car parking. The trip generation calculations have failed to consider the trip impact and subsequent parking requirements of the on-site conference facilities which are likely to generate a substantial level of activity. This further calls into question the assessments of the development impact presented in the TA.

Despite the signage strategy, visitors will likely route via unsuitable roads, and the impact of the development on the local road network has not been mitigated. It has also not been proven that safe and suitable access is achievable due to issues with the drawings and the lack of a Road Safety Audit.

When taken together, all of the above issues are such that the development is considered to be contrary to local and national policy set out in the adopted local plan and the NPPF. We would therefore respectfully suggest that if the above issues cannot be satisfactorily addressed, that the only course of action is to refuse planning permission for the reasons outlined above.”

- 3.8 The Parish Councils conclude that this application, as submitted, fails to demonstrate a sustainable location in transport terms and as such does not comply with Local Plan policy SLE4 or NPPF paragraph 103.
- 3.9 The Parish Councils also note the objections that has been submitted to these proposals from Highways England, and the Local Highway Authority (Oxfordshire County Council).

Landscape Impact

- 3.10 The applicant contends that the effects of the proposal on the landscape are negligible and can be mitigated where necessary. In the planning statement at paragraph 6.67 the applicant contends that:

“The LVIA concludes that there would be no effects on the character of the wider landscape once the Proposed Development is operational and that there would be ‘Long Term Minor Beneficial’ effects on site and ‘Long Term Negligible Adverse’ effects on the surrounding local landscape. These not being considered as significant in EIA terms. In terms of visual effects, the establishment of woodland elevated on mounding along the southern boundaries would reduce views of the Proposed Development from the adjacent properties of Vicarage Farm and Stableford House, resulting in ‘Long Term Minor to Moderate Adverse’ effects, which are considered to not be significant in EIA terms.”

- 3.11 However, Applied Landscape Design Limited (ALD) has reviewed the landscape assessments and (as PBA did with the Transport assessments) has noted some serious failings in the methodological approach that the applicant has taken in making assessments.

ALD considers that some of these failings could be overcome with additional work and the full opinion can be seen at **Annex C** to this letter, but nevertheless ALD concludes that:

“...the impact both visually and in terms of change to the landscape character, is considered significant and a development of such a scale, footprint and massing is not commensurate with a site of this nature in this location.”

- 3.12 The Parish Councils believe that this demonstrates that the application fails to fulfil the requirements of Local Plan policy ESD13 and paragraph 170 of the NPPF.

Built environment and Heritage impact

- 3.13 The applicant contends at paragraph 6.76 of the planning statement that:

“In relation to above ground heritage assets the LVIA concludes that “potential effects on the settings of six designated heritage assets have been assessed ... [and] ... no significant residual effects have been found.”

- 3.14 The Parish Councils are not necessarily arguing that there are direct visual effects upon any specific heritage assets. However, only considering direct visual effects fails to consider the full breath of CDC Local Plan Policy ESD 15. The increase of traffic through Chesterton, and specifically its Conservation Area, will not *“improve the function of the area.”* this will impact of traffic flow and impede people’s movement and interactions. Furthermore, the increase of traffic can only be considered as an adverse impact upon the setting of the Conservation Area.
- 3.15 The Parish Councils also question whether the proposed scheme meets the second criterion of policy ESD 15. Since it is accepted that the application site is in the open countryside (and it does not include the redevelopment of existing buildings as required by policy T5) it cannot be considered to be an appropriate land use. Hotel and leisure uses ought to be directed to town centre locations.

Natural environment impact

- 3.16 The Parish Councils have serious and fundamental concerns about the applicant’s approach to understanding and assessing the biodiversity impacts of the proposals, especially in terms of aiming to achieve net gains. The baseline assessment of the site assumes that the ‘managed’ grassland (and other flora) of a golf course will be of little biodiversity value because it is regularly cut and cleared. Whilst this might be true of the tightly cut greens; the rough at the edges of the playing areas and the landscaping in between is mature and has the potential to hold a reasonable biodiversity value or at least semi-natural habitat. With the baseline set too low then the proposed biodiversity returns will appear greater than they are in reality. The Parish Councils submit that the applicants ought to be asked to reassess the existing biodiversity value of the site and reassess the impacts and proposed benefits, before any decision can properly be made.
- 3.17 Turning to the water impacts of the proposals, and whilst it is acknowledged that the site is entirely in Flood Zone 1 – the lowest level of flood risk – the site is 18.6 Ha and as such is accompanied by a flood risk assessment. However, this assessment pays little attention to the ‘downstream’ effects that a proposal of this nature would have. The introduction of significant amounts of hard standing and built form to an area will increase the amount and

speed of water runoff. The applicant might be able to manage the effects of this run off on its own site, and the inclusion of attenuation ponds / sustainable drainage in the proposals is welcomed. However, the Parish Councils consider that there is insufficient consideration of the impact on the Wendlebury Brook and the village of Wendlebury which is a short distance down-stream. Wendlebury has been the unfortunate focus of recent flood events, and the Environment Agency, Oxfordshire County Council (Lead Flood Authority) and Cherwell District Council have all engaged and invested significant time a resource in managing and seeking to mitigate these event that will be at serious risk if a proper assessment of the proposal and its potential cumulative impacts with other local developments is not undertaken. The Parish Council's note that the Lead Flood Authority has raised objections to this proposal.

- 3.18 Flood risk, moreover, is not the only serious concern regarding water of the proposals. Chesterton falls within the Thames Water: Swindon and Oxfordshire (SWOX) water management area. SWOX is an area of very serious water stress; an area which supplies London and an area where a number of large reservoirs are being considered along with the potential to pipe water from the Severn or the Trent into the Thames. Given these fundamental challenges the Parish Councils are deeply concerned to read in the supporting evidence for the application that water usage is described as follows in the Outline Water Resources scoping note on pages 7 and 8:

"In advance of any design works or the implementation of any water consumption mitigation measures, Great Wolf Resorts estimated the annual water consumption for the development to be 192,600,000 litres per annum. This estimate was developed by Great Wolf Resorts, and is based on operational data from equivalent operational Great Wolf Resort developments across the USA."

"Through the adoption of the identified water consumption mitigation measures, it is estimated that the annual water consumption for the development can be reduced to 141,512,000 litres, which equates to circa 395,285 litres per day. This estimate is considered a worst-case scenario, and is based on 100% occupancy throughout the year, factoring in a one-week maintenance shut down period per annum (i.e. operational for 358 days per annum)."

- 3.19 The Parish Councils consider that such a cavalier approach to resource use – even after supposed mitigation – can only be understood as direct contraventions of Local Plan policies ESD1 & ESD8 and the NPPF at paragraphs 8, 11, 148-150 and 170.

Loss of Golfing facilities

- 3.20 Before Christmas there was a response to the application from the Leisure team at CDC. This response suggested that there was a continued need for golfing facilities in the Bicester area. This response can no longer be found on the CDC website, and despite requests from the Parish Councils, it appears not to have been reinstated. However, a copy of that response can be found at **Annex D** of this letter.
- 3.21 The Parish Councils are of the view that the potential loss of (half of) this facility is deeply concerning; would reduce opportunities for improved health and wellbeing; result in a loss of active engagement in sport; and, moreover is inappropriate in an area which would have a deficit if the development is allowed to go ahead. Furthermore, 18-hole golf course users would have to travel further afield which would represent a further unsustainable result of

the proposals and increase in car usage. At **Annex E** of this letter is a report produced by Chesterton Parish Council which considers the likely effects of the proposals on the golf club and golfers in the local area.

3.22 The accompanying text to Local Plan policy BCS10, at paragraph B.157, reports that:

responsibility for provision of open space and recreation facilities in the district is shared between the councils, private sports clubs (such as Bicester hotel golf and spa) and associations and requires partnership working.

3.23 Paragraph B.158 continues:

The Districts PPG17 Open Space Sport and Recreational Facilities Needs Assessment, Audit and Strategy 2006 and the subsequent Green Spaces and Playing Pitch Strategies 2008... highlighted the need to protect all sites identified in the audit to ensure an adequate supply of open space provision.

3.24 Chesterton golf course is in the green spaces strategy 2008, and therefore identified for protection. The Parish Councils are of the view that this demonstrates the continued need for the facility contrary to the assertions of the applicant.

3.25 Furthermore, the Green Space Strategy – Background Document (July 2008) was used as part of the leisure evidence base to inform the policies relating to open spaces and recreation for the Cherwell Local Plan Part 1. It identifies at point 7.26 an action plan for the current and future need of Golf Courses in the Cherwell Area. It identifies that there is a shortfall of 1 course, and that the action plan should ‘encourage a club/commercial operator to provide one additional course in the Chesterton area’. This document also shows that Chesterton golf course is used to offset the deficit of golfing in the surrounding areas.

3.26 The Green space strategy 2008 also reports:

- At page 12: “local consultation suggests that there is a need for more facilities with 53% stating that current provision is inadequate.”
- At page 23 of green space strategy it also states that CDC should consider the provision of an additional course in the Chesterton Area.

3.27 The CDC Open space, sport and recreation assessment and strategies Part 2 Sports facilities strategy executive summary in august 2018, which was published in the evidence base for local plan part 1 partial review’ also reports:

- The existing golf course sites should be protected, unless the tests set out in the NPPF are met (Point 11.15)
- Current forecast long term need is for additional provision by 2031 in the Bicester sub area of: 1x 18 hole course or 2x 9 hole courses, 8 driving range bays. (Point 11.18)
- modelling future growth based on membership – “In the Bicester sub area, there is already a slight shortfall of provision, but this will increase in the period up to 2031 at a level which will mean that a new golf club is very likely to be required with a standard course(s) and driving ranges. Alternatively the existing clubs may also wish to expand, potentially with new shorter courses and/or new forms of the game.” (Point 11.44)

4.0 The need for the development

Identified Employment Need

- 4.1 As stated in paragraph B.44 of the CDC Local Plan Part 1, “to ensure employment is located in sustainable locations, to avoid problems such as traffic on rural roads and commuting, employment development in the rural areas will be limited”. CDC then link this to its strategy of focusing new housing development at Banbury and Bicester, making clear its intention to seek the sustainable colocation of housing and employment. Given the relative distance of the application site to the homes both existing and proposed in Bicester – especially when compared with other employment opportunities and mixed developments – the Parish Councils are not convinced that this proposal is in conformity with this general strategy.
- 4.2 Moreover, paragraph B.46 of the CDC Local Plan Part 1 states that “the new allocated employment sites in Banbury and Bicester, along with existing employment sites are considered to ensure a sufficient employment land supply”. This can be seen to confirm that there is not a significant need for the Great Wolf lodge Resort as a contribution to the CDC employment land supply.
- 4.3 In the Economic Statement which supports the application, the Applicant attempts to demonstrate how the proposals are consistent with the Oxfordshire Local Industrial Strategy (LIS). Reference is made to providing jobs for young and old and to increase the skills of the local community by providing opportunities for life-guard training. These are laudable arguments but not demonstrably an addition to opportunities that already exist both locally in Bicester and across Oxfordshire. The case studies that are included in the Economic Statement also include examples of career paths that can be followed once one has a job at a Great Wolf Resort, and again these appear impressive but are similar to others that can be gained in the leisure and hospitality sectors (including in locations across Oxfordshire). The Parish Councils are less clear however, how these claims fit with the explicit ambition of the LIS which is as follows (taken from its explanatory overview):

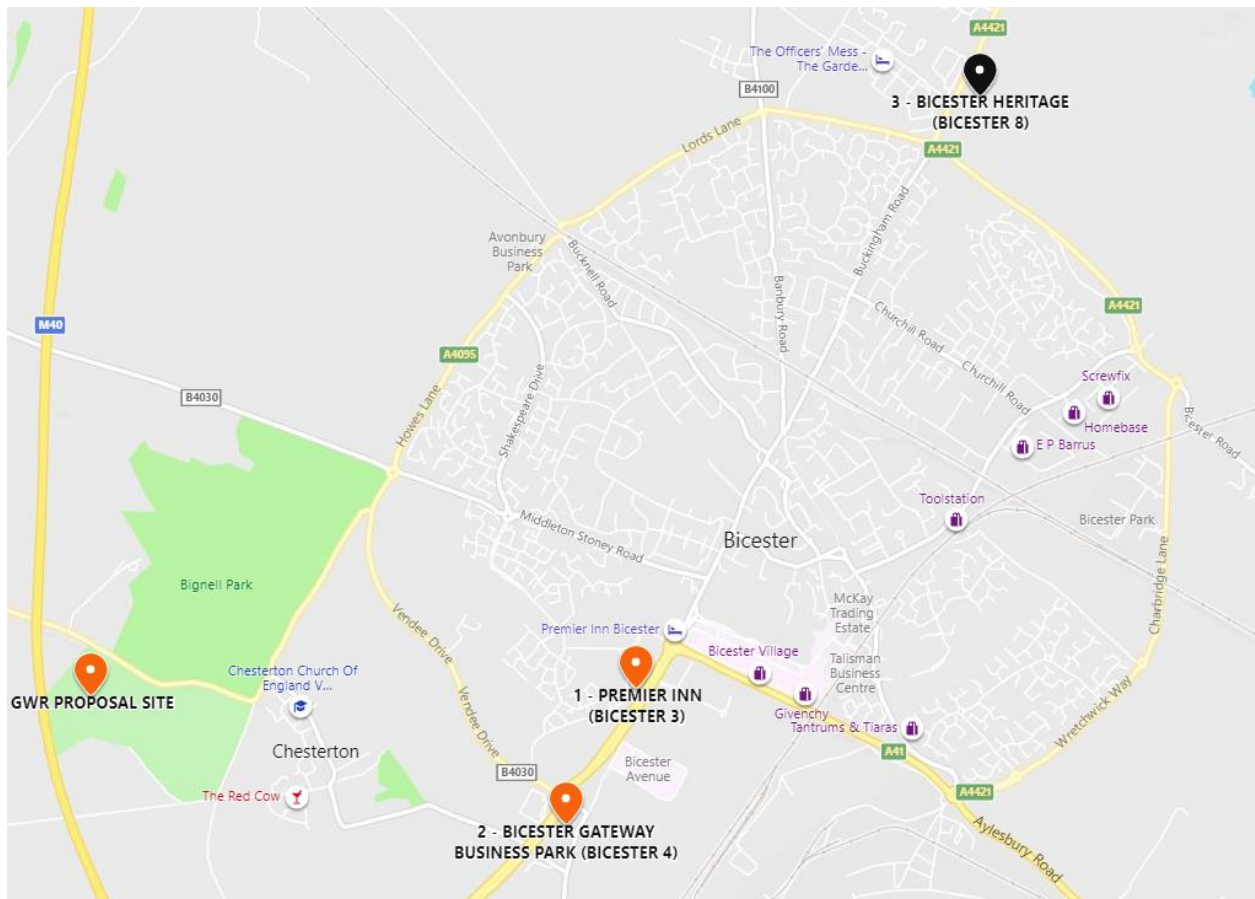
“Our ambition for the Oxfordshire Local Industrial Strategy is to position the county as one of the top three global innovation ecosystems, highlighting our world-leading science and technology cluster and to be a pioneer for the UK and our emerging transformative technologies and sectors.”

Identified Hotel Need by Cherwell District Council

- 4.4 As previously mentioned, CDC has identified three strategic areas which are expected to have hotels included as part of its leisure provision in Bicester. This will meet the demand for overnight stays as expressed in Policy SLE3. These hotels have been identified in appropriate sustainable areas that are allocated for growth in Bicester.
- 4.5 In the accompanying text for Policy Bicester 3, South West Bicester Phase 2, it states that Phase 1 of the urban extension (known as Kingsmere) is already under construction, including a hotel. The hotel at this strategic area has now been completed and is a Premier Inn. The Premier Inn was granted planning permission for 80 bedrooms on 4/05/2012 (12/00063/REM of 06/00967/OUT) and a 56-bedroom extension was granted on 21/12/2018 (18/01208/F). The premier inn is now a 136-bed hotel.

- 4.6 Policy Bicester 4, Bicester Business Park, includes a 149-bed hotel as part of its already approved planning permission (16/02586/OUT and 17/02557/REM). Full implementation of this scheme requires the completion of Junction 9 improvements, of which both CDC and Oxfordshire County Council are both supportive. Oxfordshire County Council has already agreed the junction improvements to allow this site to be developed.
- 4.7 Policy Bicester 8, Former RAF Bicester, includes the provision of a hotel – “the development of hotel and conference facilities will also be supported as part of a wider package of employment uses”. An application at this site for a 344-bed hotel has already been submitted by Bicester Heritage Ltd in July 2018 and is currently under consultation (18/01253/F).
- 4.8 The combined total of hotel rooms that would/could be provided in these three strategic areas is 629 rooms. Details of their applications can be seen in the table and map below.

Map	Reference	Address	Proposal	Validation Date	Status
1	12/00063/REM	Premier Inn Kelso Road Bicester OX26 1AN	80 bedroom hotel	03/02/2012	Approved 04/05/2012
	18/01208/F		56-bedroom extension	09/07/2018	Approved 21/12/2018
2	17/02557/REM	Bicester Business Park Wendlebury Road Chesterton Bicester OX25 2BX	149-bedroom hotel	19/12/2017	Approved 28/03/2018
3	18/01253/F	Bicester Heritage Ltd	344-bedroom hotel	17/07/2018	Under consultation



- 4.9 Furthermore, in Bicester town centre, the Travelodge Hotel has recently extended to provide 18 additional bedrooms (ref 17/01792/F).
- 4.10 There are also additional hotels that are identified in local plan policy for the wider Cherwell Area and the associated strategic development areas:
- Policy Banbury 8: Bolton Road Development Area (SPD currently being made, no active planning permissions)
 - Policy Banbury 9: Spiceball Development Area (Ref 13/01601/OUT approved on 7/10/2016 to include a 92-bed hotel)
 - Policy Villages 5: Former RAF Upper Heyford (Ref 16/01000/F approved on 3/11/2016 to include 16 bedrooms)
- 4.11 These recent permissions, and allocations, are in addition to a range of hotel facilities in Bicester, and around Chesterton. The Parish Councils consider therefore that the needs for hotel beds has been more than met.
- 4.12 The addition of the proposed unallocated 498-bedroom Great Wolf Lodge Resort is expected to host on average 500,000 visitors per annum. This could potentially undermine the delivery of hotels and indeed the wider development allocations of the Local Plan (i.e. if conditions requiring hotels cannot be discharged – because they are no longer viable – then the developer of new homes and genuinely sustainable development is put at significant risk).

- 4.13 The introduction of another hotel facility in the proximity of the other mentioned above also runs the significant risk that it could reduce visitor numbers at the allocated hotels within the strategic areas of the Cherwell Local Plan Part 1. Considering that two of the strategic area hotels are not yet built, the viability is yet to be fully tested and the established business case could be impacted. The economic value of proposed Great Wolf Resort is likely to create significant pulls away from sites allocated in the Plan (more detailed is provided on this later in this objection). Moreover, the strategic evidence that supports the allocated sites – including the transport modelling (e.g. Bicester Transport Model) supported by the Highway Authority – is directing at managing and mitigating the known effects. These new proposals will be ‘breaking new ground’ and creating wholly new impacts and cumulative effects that will require yet more infrastructure at additional cost. This again, will add burden to existing infrastructure and draw focus away from newly planned mitigation measures.
- 4.14 The applicant has undertaken a sequential test in an attempt to demonstrate that the proposed location is appropriate and that the impacts of delivering the scheme will be sustainable and of social and economic benefit to Cherwell. A review of the sequential test reveals that the ‘town centre first’ approach has been – to an extent – set aside. This is explained in the Planning Statement by the need to consider the “*particular market and locational requirements*” for the proposals. Whilst this follows the text of the Planning Practice Guidance (PPG) it misses the lead concept that main town centre uses should remain, as first preference, a town centre use. The same paragraph of the PPG (ID: 2b-012-10190722) goes on to explain that in such cases “*robust justification will need to be provided*” and the Parish Councils do not believe that such a level of justification has been shown by the applicant. Instead the requirements are listed as follows:
- Located 90 minutes drive time from London and Birmingham
 - Approximately 12ha (this being the built part of the Site) with a relatively level topography Reasonably well concealed with no nearby sensitive receptors
 - Proximity to and ability to connect to public transport infrastructure
 - Main road proximity and visibility and ease of access
 - M40 corridor location
 - Proximity (within 30 minutes drive time) to population of 30,000 plus providing local workforce
- 4.15 This list of requirements is not accompanied by any identified need for the proposals or how this wish list has had any regard to the local or indeed national planning context. As outlined above, the Local Plan sets out how and where employment and leisure provision will be delivered in sustainable locations, and the application fails to properly engage with that.
- 4.16 Moreover, these “*specific requirements*” go against the identification of a sustainable location (a large site with “reasonable” connections linked to road systems with a workforce that lives up to 30 mins away). Except the identification of accessible public transport which (perhaps ironically) is not actually available at the proposed site and has resulted in the inclusion of the shuttle bus. Furthermore, the Parish Councils are not convinced that the shuttle bus, given its limited timetable and sphere of influence and that most visitors to the resort will travel from some distance, is likely to be effective.
- 4.17 The Applicant goes on to argue that:

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

- 4.18 This presents another problem in identifying exactly what the application is for in ‘land use’ planning terms – as explored below – but furthermore this confuses the assessment of economic impacts and a sequential test because it fails to identify what use will have an effect on its surrounds and where its most appropriate location might be. It is considered therefore, that this provides an even stronger argument that this kind of bespoke, mixed use, scheme ought to be supported by specific needs assessment evidence and be genuinely plan led in its approach, not decided on an ad hoc single application basis.
- 4.19 Turning to those sites that are considered through the sequential test; first there is a seemingly random selection of towns included at a radius of some 120 minutes from London. The premise for which is a flexing of the applicant’s desires – there is no robust planning reason for considering this or suggesting this approach. Following this listing of towns there is then a trawling of large sites. A number of sites are listed as not available because they have some form of allocation or consent for a different use (usually housing) and this raises the question as to why they were then included in the list at all, or why more reasonable alternatives were not included. It would be a simple assessment that as a first step filtered out sites that were consented for different uses and then as a ‘stage two’ looked more closely at available sites.
- 4.20 At Bicester specifically, strategic site allocations of the Local Plan are considered but of the three listed at our paragraph 2.5 above, which specifically *include* a hotel provision, one is missed and the other two are suggested to be unsuitable. This is an illogical conclusion, given their explicit allocation for such uses and just because they have some form of consent, does not mean that all the reserved matters or conditions that relate to a hotel have been extinguished. There could exist some form of commercial agreement to include a Great Wolf Resort within the allocated sites. Also, as explained above, the very fact that there are allocated hotel developments around Bicester means that any new applications risks undermining what is planned.
- 4.21 Additionally, the Parish Councils note that the ‘front nine’ holes of the Chesterton golf course has not been included in the sequential assessment. This would appear to be an odd decision given that it has an existing access point, has some built form and would be a more reasonable and logical alternative to a number of those that are included in Appendix 3 of the planning statement.
- 4.22 The Parish Councils consider therefore, that the sequential approach taken to identifying this location for development has not been undertaken in a justified or robust manner that would comply with the provisions of the NPPF, PPG or the Local Plan.

Conference Facility Need

- 4.23 The Parish Councils question the need or justification for this element of the application. The proposed development at the Great Wolf Lodge Resort includes 550sqm GIA of conference space at a dedicated conference centre. The Cherwell Local Plan Part 1 only includes conference facilities in one of its policies (Policy Bicester 8: Former RAF Bicester) as a reflection of the lack of need. The conferencing facilities at this strategic location have

not yet been built out. A planning application was validated on 17/07/2018 (Reference: 18/01253/F) for conferencing facilities at this location and is currently under consideration.

- 4.24 The addition of the proposed unallocated conferencing facilities at the Great Wolf Lodge Resort is expected to contribute to the resorts average of 500,000 visitors per annum. This, as with the hotel bed provision has the potential to undermine the Local Plan's aspirations and allocations. The provision on the application site could potentially reduce visitor numbers at the allocated conferencing facilities within the strategic area of the Local Plan at Former RAF Bicester. The conferencing facilities at Former RAF Bicester have not yet been built and as a result their popularity and viability are yet to be established. The reduction in visitor numbers to the proposed development at Former RAF during their first few active trading years could cause potential closure and therefore local plan policy failure due to lack of use.
- 4.25 Bicester Hotel Golf and Spa currently provides a range of flexible conferencing facilities, with the maximum number of delegates being able to attend at any one time being 200. The proposed conferencing facilities at the Great Wolf Lodge Resort would be in direct competition to those adjacent, potentially create an adverse economic impact to the local and wider economy of Cherwell. The Parish Council's therefore suggest significant caution should be places on any claimed economic benefits of this element of the proposals.

Destination Resorts vs Hotel

- 4.26 Great Wolf Lodge Resort is described in the submitted DAS Part 1 as being "a one-of-a-kind family resort experience with an exciting indoor Water Park, other attractions and entertainment offerings and dining options all under one roof, creating an affordable and fun-filled getaway that families can enjoy together". The Cherwell Local Plan Part 1 and its evidence base does not identify a need in the area for a "destination resort."
- 4.27 The Cherwell Local Plan Part 1 does however identify a need for hotels. Provisions have been made for this demand as explained above at section 4.0, in the strategic growth towns of Bicester and Banbury. These are settlements which have been clearly outlined for major developments due to their size, scale and capacity for sustainable growth. Chesterton has not been identified in the Cherwell Local Plan Part 1 as a sustainable location for this type of growth or development.
- 4.28 The applicants DAS Part 1 includes the following statement:

"In The UK, Great Lakes UK Ltd [has] selected Bicester as the location for the first resort due to the areas profile, proximity to major urban centres, as well as links to the motorway network."

The Parish Councils are not convinced by this statement and consider it to be misleading as the applicant has actually selected Chesterton as their site location, rather than Bicester. The applicant has justified the choice of location using characteristics of the sustainable growth town of Bicester, rather than characteristics of the village community of Chesterton. It is important to note that Bicester and Chesterton are physically separated by an area of sensitive greenfield land.

4.29 AS demonstrated above, the proposed destination resort does not meet the hotel demand in Cherwell. The Great Wolf Lodge Resort has many different identified uses, rather than just a hotel (C1), such as the following:

- Family entertainment centre
- Indoor rope course
- Climbing walls
- Mini golf
- Arcade
- Bowling
- Interactive games
- 6ha nature trail
- Waterpark
- 24 Hour grab & go food outlet
- Fast food restaurant
- Taco restaurant
- Pizzeria
- Barnwood restaurant (including breakfast buffet)
- Coffee Shop
- Candy shop
- Ice Cream Parlour
- Conference facilities

4.30 It is clear that the above uses are included to ensure guests at Great Wolf Lodge Resort are entertained and remain at the resort. This is in comparison to a traditional hotel (of which there is an identified need in Cherwell) to support the local tourist attractions and amenities, where potential day visitors to the area would stay overnight.

4.31 The intention to retain visitors for the duration of their stay is confirmed in the submitted planning statement – “Great Wolf Resorts ... are an icon in the hospitality industry by offering everything under one roof”, “a new type of indoor family resort”. The Parish Councils question the social and economic value of such a proposal to the wider community of Cherwell. This situation also raises a further question which is that of the land use under consideration and whether it is to be determined as a hotel (C1) with ancillary uses or as a sui generis “destination resort.”

5.0 Claimed benefits of the scheme

Economic and social Benefits

5.1 Chapter 5 of the Environment Statement is the socio-economic assessment of the proposals. At paragraph 5.3.29 proposed visitor spend is summarised as follows:

- *Visitors to the Proposed Development spend the same proportion of their total expenditure on accommodation, shopping, food and drink, and attractions as staying visitors;*
- *The average room rate at the Proposed Development is 41% of visitors’ total spend, which is the total of accommodation and attraction spend for staying visitors in Oxfordshire. This conservatively assumes that all of visitors’ expenditure on attractions would be within the Proposed Development. After travel expenditure (which is assumed*

to be fully absorbed by the transport providers), the remaining 43% would therefore be spent on shopping and food and drink;

- A high proportion of the food and drink and shopping spend would also take place in the Proposed Development. However, there are some opportunities for local retail and food and beverage spend outside the Proposed Development, particularly in Bicester Village. It is conservatively assumed that 25% of total spend on food & drink and shopping is spent outside the Proposed Development in the rest of Oxfordshire; and*
- There will be a high proportion of children visiting the Proposed Development and whilst these will support expenditure in Oxfordshire, they will not be expected to do so directly. This analysis therefore only accounts for spending of adult visitors, which, based on likely attendance, is expected to be approximately half of visitors.*

- 5.2 The summary appears to suggest that the majority of the spend by visitors and staying guests will be retained within the resort. This is, after all, the business model which is described elsewhere through the application and supporting documentation. Moreover, the off-site spend is suggested to be most likely focussed at 'Bicester Village' which is a destination in its own right at Bicester (and in Oxfordshire) that brings some limited benefits to the surrounding area but is not a large generator of local economic growth. At best, it appears that a quarter of the overall spend might be in the local area, but the Parish Councils are not convinced that once people arrive at the resort they will be enticed beyond the front gates because everything is on site. Moreover, the unsustainable nature of the location means anyone will have to travel by car, quite some distance, to find a food offer or indeed visit 'Bicester Village.'
- 5.3 The applicant claims that the Great Wolf Lodge Resort will create "*additional local spin off jobs and wider economic benefits, through demand for local goods and services in the area associated with increased visitor numbers and £4.9 million of additional spend per year to the area.*" The Parish Councils have serious concerns regarding the validity of these claims.
- 5.4 As explained above, the Great Wolf Lodge Resort will encompass a large number of food and beverage outlets, as well as various recreational activities. As a result, the Parish Councils envisage the majority of spending to be internal as 'everything is under one roof'. The economic statement (prepared by Volterra) states that the Great Wolf Lodge Resort visitors are expected to spend £4.9 million per year on food and beverage and retail across Oxfordshire. Point 4.17 of the economic statement clarifies that this amount was based on an assumption that 25% of the total spend on food and drink being outside of the proposed development. The Parish Councils are not convinced that a resort which provides the range of dining facilities as proposed would also provide a compelling reason for visitors to leave and spend their money outside its gates. Furthermore, those that do leave are likely to do so by private car given the closest alternative eating options are at some distance, so again, this undermines the sustainable location arguments for the proposal. The Parish Councils also note, on this point, that the transport assessment that is submitted alongside the proposals does not appear to include traffic movements for visitors leaving temporarily to find food in the local area. It is suggested that the transport assessment are revised to cover this matter.
- 5.5 The nature of hotel employment is that it is necessarily seasonal and staff are generally lowly paid. 4.13 of the economic statement identifies that workers are expected to spend

an estimated £157,000 per year in the local area. 4.14 continues: “*due to lack of relative spending options within close proximity of the site, it is likely that many workers will have their lunch at the proposed development or bring lunch from home*” Chesterton has two options – the Red Cow pub or the brasserie at the Chesterton Hotel – and there is no local shop. The Parish Councils are far from convinced that the claimed figures are accurate. Once more, if staff do choose to go to a shop for lunch it will be in Bicester which means more vehicle trips.

- 5.6 Furthermore 42% of the jobs are targeted at those under the age of 21 (lifeguard and hospitality training). The wages for this are likely to be limited and represent a limit on the spending power. Also, it is not clear exactly how this fits with the Local Industrial Strategy and Oxfordshire’s focus on high-value job, apprenticeships and the science and technology sector.
- 5.7 The employment of construction staff is likely to be a short term social and economic benefit. Spending is based on the assumption that 60% of workers will spend £10.32 a day for 220 days a year. However, a ‘Yougov’ survey found that workers spent £6 average in local area on average in 2005, this has been uplifted to reflect earnings growth and then a 50% leakage applied to total spend to account for lack of options at the site and current lack of transport. As with the hotel staff considered above, the direct local return seems limited and certainly there will be very few benefits to Chesterton locally during construction regarding worker spending. Moreover, the Parish Council do not consider that this is a significant or unique benefit of this proposal. Development jobs – and the limited associated spending – will be generated by all development proposals in and around the local area, and across Cherwell.
- 5.8 The arguments that the applicants present in terms of the supply chain for the proposals are not convincing. There is limited convincing evidence that this will be sourced locally. It is likely that a corporate chain like Great Wolf Resorts will have a branded catalogue which ensures that products and supplies are kept within a company or often shipped in with minimal positive impact for local providers. Moreover, the fact that the proposal is to include laundry facilities and other ‘back of house’ functions within the site will prevent other opportunities for local supplies to engage with the new resort.
- 5.9 Finally, the generation of business rates is suggested as a potential benefit of the scheme. However, it is considered that contributions for local and regional benefit is not likely to be sufficient to outweigh the harm in to landscape and the local highway network. Moreover, this benefit is a general benefit of most commercial development and is of limited weight in a single case. This must also be balanced against the potential that business rates could be lost through increased hotel or conference competition where no increase need has been identified and at BHGS for example due to closure of half of the golf course and reduction in conference facility use.

New Nature Trails

- 5.10 The proposed development includes the provision of a 6ha nature trail area at the north of the site, which has been identified to provide genuine public open space (as explained in the planning statement).
- 5.11 Policy ESD 17: Green Infrastructure (CLP1) accompanying text, B.279 protection and enhancement of open space, sport and recreation sites will assist in maintaining the green infrastructure network. The loss of half the golf course is clearly contrary to this policy. it

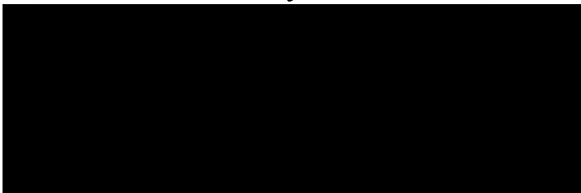
is considered unlikely that a net gain in biodiversity will be achieved because the new nature reserve only protects a small section of the existing green infrastructure at this site.

- 5.12 The new nature trails area will not be permanently open – it will only be accessible during certain times – and these are set to replace the public right of way that was clearly also open and accessible. Furthermore, is in close proximity to the motorway where noise and air pollution is likely to have a significant adverse effect. The nature reserve is also in the least accessible location at the back of the development area, furthest away from the Chesterton. Its benefit to the local community will be reduced as a consequence.

6.0 Conclusion

- 6.1 The Parish Councils consider that the application is contrary to the adopted Local Plan. It is not on a site allocated for its development and it would result in the loss of a locally needed sports facility. There is no demonstrable need for the proposals, and the chosen location is not sustainable.
- 6.2 The Parish Councils have identified harms to the landscape, the local transport network, and potentially to the local economy. These harms clearly outweigh the suggested social and economic benefits and it is therefore respectfully suggested that on this basis the application for development consent should be refused.

Yours sincerely,



Peter Canavan MRTPI
Associate Partner

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ANNEX A: Victoria Prentis Support Letter

VICTORIA PRENTIS MP



Mrs Jackie Williams
Clerk
Chesterton Community Centre
2 Geminus Road
Chesterton
OX26 1BJ

Our Ref: AW/VP23889

20 January 2020

Dear Jackie,

I am writing in support of your ongoing efforts to draw attention to the potentially damaging Great Lakes UK Ltd Planning Application, No. 19/02550/F.

Having spoken to my constituent, Mr Nick Newton, of Stableford House, Chesterton, I understand your efforts to rally the support of the community has been invaluable.

I am, as you are, particularly concerned with the threat to biodiversity this application proposes. Protecting our beautiful countryside, and championing responsible development, has always been important me.

Please do keep me updated and let me know if I can be of any help.



Victoria Prentis MP

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ANNEX B: PBA Transport review

Our Reference: 502.0073/280120/JR

28th January 2020



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Dear Clare

Planning Application 19/02550/F – Land to the east of M40 and south of A4095, Chesterton

We are writing on behalf of Chesterton Parish Council, who have appointed Paul Basham Associates to undertake a review of the transport aspects of the above planning application, for the, *“Redevelopment of part of golf course to provide new leisure resort (sui generis) incorporating waterpark, family entertainment centre, hotel, conferencing facilities and restaurants with associated access, parking and landscaping.”*

We have a number of serious concerns with regards to the application and the information that has been submitted in support of it, in relation to the sustainability of the proposals, the access and off-site highway improvements and the impact on the local road network. It is noted that Oxfordshire County Council’s (OCC’s) consultee response dated 10th January 2020 outlines similar concerns with regards to the development proposals.

Sustainability

The National Planning Policy Framework (NPPF) sets out a general presumption in favour of sustainable development, and states that, *“it should be ensured that... appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location,”* (paragraph 108). Policy SL4 of the adopted Cherwell Local Plan 2011-2031 states that, *“all development where reasonable to do so, should facilitate the use of sustainable modes of transport to make the fullest possible use of public transport, walking and cycling.”* Policy ESD1 states that, *“Measures will be taken to mitigate the impact of development within the District on climate change... delivering development that seeks to reduce the need to travel and which encourages sustainable travel options including walking, cycling and public transport to reduce dependence on private cars.”* This policy is echoed by the local highway authority, Oxfordshire County Council in Policy 18 of the Local Transport Plan 2015-2031, which states, *“OCC will seek to ensure... that the location of development makes the best use of existing and planned infrastructure, provides new or improved infrastructure and reduces the need to travel and supports walking, cycling and public transport.”*

It is considered that the development proposals do not accord with the national and local policies outlined above. As outlined with OCC’s comments, *“the proposal is not allocated in the Cherwell Local Plan and is not in a sustainable location in transport terms.”* The development will generate a significant amount of travel, and by virtue of being situated in a rural, isolated and unsustainable location neither reduces the need to travel, nor reduced dependence on private cars. It is noted that the proposals include the creation of a new footway between the site and Chesterton, along the A4095. However, it is unclear how this will encourage walking to/from the site given the customer catchment area for the development of *“a 125-mile drive”* (Transport Assessment ref 1803047/gwvice para 5.24). Whilst it is possible that a very modest number of the anticipated 460 FTE staff may live in Chesterton (population 850 according to 2011 Census data) it is not considered that the footway will increase walking to/from the site to any meaningful degree.

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Transport Planning



Highway Design & Civil Engineering



Travel Planning

QMS0096/v4/200818/SA

At the point at which the proposed cycleway/footway terminates at the A4095/Hale junction, cyclists would be required to cross the A4095 to join the carriageway towards Bicester.

Substantial volumes of traffic in this location combined with vehicles turning out of the Hale/A4095 junction make it considerably difficult for cyclists to safely cross the carriageway in this location therefore raising highways safety concerns. Pedestrians too would be required to cross the A4095 between the A4095/Hale junction and the A4095/Alcester Road junction, and no crossing facilities are provided.

Furthermore, it is considered highly unlikely that any visitors will cycle to the site, given the size of the catchment area and lack of dedicated cycling facilities on the A4095, as well as the likely need for luggage. The Transport Assessment states that National Cycle Network Route 51 (NCN51) runs alongside the A41 Oxford Road south east of the site and is a traffic-free shared pedestrian and cycle route. This is not however correct; beyond the Bicester Avenue Home and Garden Centre the route becomes an on-road route requiring cyclists to cycle alongside vehicular traffic. Considering the likely family nature of typical guest groups (typical room occupancy is 4.5 guests per room including children according to TA para 5.16), even if visitors were prepared to cycle to the site, the lack of cycle routes will discourage most groups from cycling.

The above places great importance upon the use of public transport to reduce dependency on private cars. The TA acknowledges that only one bus service operates per day between Chesterton and the site. This service is a one-way service and departs Chesterton at 07:25 (Monday-Friday). The absence of any bus service back to Chesterton and the infrequency of this one-way service are insufficient to serve a development of this scale. In this respect, the proposed shuttle bus from the site to Bicester Village and Bicester North train stations could encourage visitors to travel by train. However, in practice, the shuttle bus of unspecified size offers a poor, infrequent service and will do little to encourage sustainable travel. At a frequency of once every 2 hours, the shuttle bus is impractical and unattractive, which would discourage those who would otherwise consider travelling by train. Those that do travel by train may have to wait considerable amounts of time at the station. It is noted that the TA states that the shuttle bus will be timed to meet arriving/departing trains at each station (para 4.9). However, trains arrive and depart Bicester Village and Bicester North at much higher frequency than once every 2 hours (up to 10 arrivals every 2 hours at each station). Even if customers chose to travel by train to coincide with a shuttle bus pick up, train delays may occur, which may then have a knock-on impact on passengers waiting at the other rail station. With such an infrequent bus service and up to 20 arriving trains between shuttle bus trips, a substantial number of customers may wish to use the shuttle bus (other issues notwithstanding). It is unclear what would be done if the shuttle bus were full.

Whilst the staff shuttle bus is also in theory positive, this is again considered unlikely to encourage any significant amount of sustainable travel, with similar issues to the customer shuttle bus. With 460 FTE staff, a significant percentage of employees are likely to live outside of Bicester. Working on a shift pattern, the staff shuttle bus is to be timed with the start/end of shifts (TA para 4.11). It is unknown whether this will also coincide with suitable train or other bus journeys for those commuting from outside of Bicester. Furthermore, due to the shift pattern, demand for the shuttle bus will be concentrated in short periods, and the protocol is again unclear if the staff shuttle bus were to be full. This bus will also be open to residents of Chesterton as specified within TA para 4.8, no information is provided on how priority will be organised and how residents will access this bus.

If the development were to go ahead, it would be fundamentally important for the shuttle bus to be secured in perpetuity with details of the bus specification, size, route and frequency all set out the legal agreement. Whilst the submission of a Framework Travel Plan is welcome, it does not overcome the issues associated with the unsustainable location of the site.

Cont.



Furthermore, the provision of 900 car parking spaces is excessive and is contrary to the requirement to reduce dependency on the private car and encourage sustainable travel. By virtue of the level of parking provided, the unattractive sustainable travel options and inaccessible nature of the site, the application encourages use of the private car at the expense of sustainable travel modes for both visitors and staff. A reduction in the amount of car parking provided on-site would make driving a less attractive option and encourage use of more sustainable modes (other concerns outlined above notwithstanding).

The provision of 30 Sustainable Day Passes for those who utilise the shuttle bus is a positive measure; however, this is in addition to the 2250 other guests. This measure therefore does nothing to encourage sustainable travel for 98.7% of visitors and will not discourage use of the private car.

In summary, the nature of the use and local context are such that it is considered unlikely that any meaningful amount of staff or visitors will walk or cycle to the site. The customer shuttle bus is not considered to offer an attractive service and is unlikely to encourage travel by sustainable modes. The staff shuttle bus is also not considered to offer a sufficiently attractive alternative to driving. Also taking into account the proposed level of on-site parking provision, visitors and staff will be reliant on use of the private car, contrary to national and local policy, creating an unsustainable form of development.

Access and off-site highway improvements

With regards to the proposed access and off-site highway improvements, the drawings are based on OS mapping and do not contain any measured geometries. As such it is difficult to determine whether or not these are correct or accord with the relevant design standards, also making it difficult to assess whether the right-turn lane into the site provides sufficient capacity to accommodate vehicles turning right, particularly during the evening peak times when the A4095 is particularly busy.

Furthermore, the primary visibility splay is drawn incorrectly to the far side of the carriageway, rather than the nearside as required by Design Manual for Roads and Bridges. It cannot therefore be determined whether suitable access is achievable. Furthermore, a Road Safety Audit does not appear to have been submitted, and it has not therefore been proven that safe access is achievable either. The proposals therefore fail to meet the requirements of the NPPF which states at paragraph 108: *“It should be ensured that... safe and suitable access to the site can be achieved for all users.”*

The plans of the off-site highway improvements lack details such as the provision of corduroy paving at the end of the footway/cycleway (although the plan indicates it continues into Chesterton, which is presumably in error).

Public Rights of Way

As outlined in the TA, there is an existing Public Right Of Way (PROW 161/06) which currently crosses through the centre of the site. It is understood that the applicant proposes to divert the existing PROW along the south-eastern boundary of the site (although the TA states the western boundary), connecting with the new section of shared footway/cycleway alongside the A4095.

Whilst a Public Right of Way can be diverted under s119 of the Highways Act 1980, it must be demonstrated that:

- a) *The diversion is expedient in the interests of the person(s) stated in the Order;*
- b) *The path will not be substantially less convenient to the public as a consequence of the diversion; and*
- c) *It is expedient to confirm the Order having regard to the effect it would have on public enjoyment of the path as a whole, on other land served by the existing path and on land affected by the proposed new path, taking into account the provisions for compensation.*

Cont.



It is understood that this section of footpath is well used by residents of Chesterton and offers a traffic-free route between the golf resort's car park and the A4095. The re-alignment of the PROW reduces the traffic-free extent of the route and would require users to walk along a shared footway/cycleway which runs along the A4095. It is considered that the proposed re-alignment leads to a worsening in comparison to the existing scenario and that the proposals do not lead to an overall betterment for existing public footpath users. Furthermore, the realignment will also require footpath users to cross the main vehicular access to the site subsequently increasing the risk of collisions between vehicles and pedestrians. The path is not considered to be more convenient to the public as a consequence of the diversion and local residents will be seeking to ensure this route remains in situ.

Impact on Local Road Network

Notwithstanding the issues outlined above, upon review of the TA a number of additional points raise further concern. The PIA data assessment reveals a high occurrence of incidents on the local road network, and given that the majority of trips to and from the site are likely to be via private vehicle, this is a cause for concern.

It is noted that vehicle trip rates and parking provision for the proposed development have been based on surveys of three of the applicant's American sites. No details of this modest number of surveys or derivation of the trip rates are available, and as such it is impossible to assess the suitability of this method or the application of these to the proposed site. There are any number of socio-economic factors that mean the trip rates may not be suitable for use in the UK, and also no assessment of the similarities or otherwise in terms of the sustainability of the American sites has been undertaken. Furthermore, it is not clear whether the trip rates and subsequent level of parking provision include for the proposed conference facilities. It is noted that the TA states that the sites within the TRICS database are not considered to be representative of the proposed development.

A Technical Note appended to the TA contains a 'first principles,' assessment of the trip rates, by comparing the Great Wolf Lodge trip rates to trip mode share at Center Parcs in Woburn. Application of the Center Parcs trip rate on a changeover day per unit of accommodation to the proposed development would be instructive but does not appear to have been carried out. No comparison of the accessibility credentials of the two sites is presented and the assertion that the mode shares are likely to be similar appear to be unfounded. The TN also assumes that all single occupancy car trips to/from the Center Parcs site were staff trips, which is an overly generous assumption. A review of the Center Parcs website also shows that discounts on train travel are offered to customers to encourage sustainable travel, which the site in question does not.

Paragraph 5.26 of the TA relates to the signage strategy for the proposed development, which is suggested to be from the M40 J9 to the A34 and the B430 and takes 10 minutes to cover a distance of 5.6 miles. Whilst the proposed signage strategy may divert drivers away from using smaller local roads, the reality is that a significant proportion of visitors are likely to use sat nav devices or route-finding software. For example, at the time of writing, Google maps directs drivers through Little Chesterton, with an alternative via Chesterton (**Figure 1**).

Given the size of the catchment area, the majority of visitors are unlikely to be acquainted with the local area and be unaware of the suitability of these routes. Furthermore, the application includes an assessment of economic benefit to the wider area arising from the scheme, which states the spill over benefits of £5.9m will "particularly" go to Bicester Village. This would suggest that even if the proposed signage strategy diverts drivers away from using smaller local roads when travelling to/from the site, the proposed development would generate increased vehicular traffic on the local road network between the proposed development and Bicester Village.

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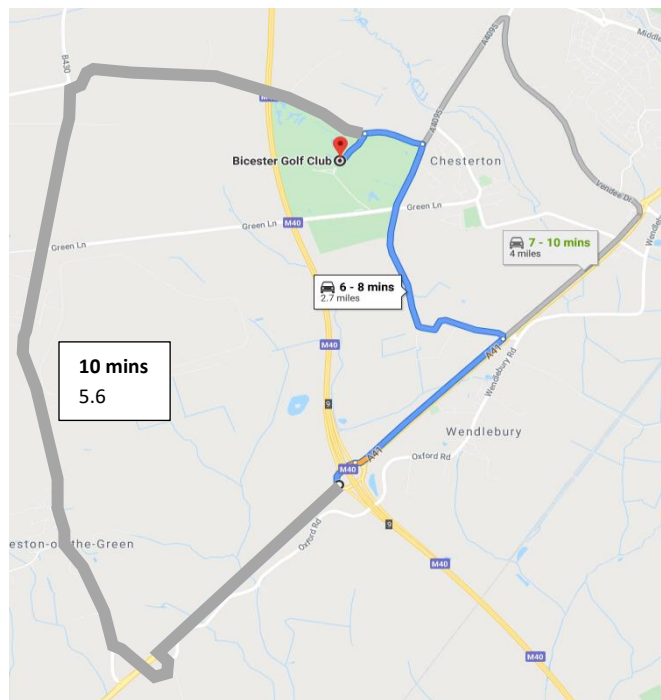


Figure 1: Google Maps route from M40 J9 to Site and Suggested Signed Route

Visitors from the northern home counties e.g. Milton Keynes and as far afield as the Midlands may choose to avoid the motorways and travel to the site via Bicester and the surrounding villages. The A41 and Bicester itself are already experiencing operational stress and a number of serious collisions have been reported at the A41/Vendee Drive junction in recent years.

Besides the Travel Plan, the applicant has not proposed any physical measures to proactively prevent visitors from using Akeman Street or Little Chesterton which are highly unsuitable routes for the quantum of development proposed due to their sinuous nature and general width. It is therefore considered that the development proposals will result in additional traffic through local roads and villages, which are ill-suited to accommodating this level of additional traffic. The development is therefore contrary to saved policy TR7 of the Cherwell Adopted Local Plan (1996) which states that, “development that would regularly attract... large numbers of cars onto unsuitable minor roads will not normally be permitted.”

Modelling assessments of the impact on the local road network have also been undertaken within the submitted TA. Our client has a number of concerns over the committed developments that have been omitted from the modelling assessments. Notwithstanding this or the concerns over trip generation calculation, the development pushes the ratio of flow to capacity (RFC – a measure of how well the junction will operate) at the A4095/Vendee Drive junction over 0.85. A RFC of 0.85 equates to the practical capacity which the TA acknowledges within paragraph 6.5, and values over this warrant the need to strongly consider capacity improvements in order to avoid operational issues and associated delays. However, the TA is silent on any possible improvements at this junction despite the development resulting in the junction exceeding its practical capacity.

Given the level of additional traffic that the proposed development will generate, the lack of any consideration to the impact of the additional development traffic on the single lane traffic calming measures in Chesterton is of concern and additional information should be provided to determine whether this impact is acceptable.

Cont.



Both Junction 9 and 10 of the M40 are already operating at capacity and when accidents occur, significant queueing occurs on surrounding roads. The M40 and A34 hold strategic importance and it is critical that their operation is not hindered. Furthermore, the A34 junction at Weston-on-the-Green is substandard by virtue of its accident history, and Highways England's Solent to Midlands Route Study identifies the presence of a number of road merges in this area as contributing to capacity issues.

Furthermore, the B430/B4030 signalised crossroads is shown to be operating over capacity in future year assessments, even without the proposed development, mainly as a result of the Heyford Park development. However, the proposed development will add traffic to this junction, resulting in greater queueing and capacity issues. The TA relies on improvements being brought forward by others, but as far as we are aware there are no identified improvement schemes available. The proposed development should at least be required to mitigate its own impact. OCC's position is that the development will have a material effect on the operation of the junction, and that further mitigation works (beyond Heyford Park Phase 2) will not be able to counteract the effect. OCC anticipate that the development traffic will have a severe impact on the road network and have objected to the scheme for the following reason:

“Severe congestion at the Middleton Stoney signalised junction will be exacerbated by the additional trips generated by the proposed development. This is contrary to paragraphs 103, 108 and 109 of the NPPF, Cherwell Local Plan Policy SLE4 and Oxfordshire Local Transport Plan 4 Policy 17”.

Summary

In summary, we have serious concerns with regards to the sustainability of the proposed development and its impact on the local road network. We do not believe that the measures put forward by the applicant are sufficient to overcome the inherently unsustainable location for this type of development. A negligible proportion of staff or visitors are likely to walk or cycle, and the proposed shuttle bus is not sufficiently attractive to encourage a significant amount of site users to travel by public transport. We also have concerns relating to the calculation of trip generation which in turn has informed the level of car parking, which also discourages use of sustainable travel. The trip generation calculations have failed to consider the trip impact and subsequent parking requirements of the on-site conference facilities which are likely to generate a substantial level of activity. This further calls into question the assessments of the development impact presented in the TA.

Despite the signage strategy, visitors will likely route via unsuitable roads, and the impact of the development on the local road network has not been mitigated. It has also not been proven that safe and suitable access is achievable due to issues with the drawings and the lack of a Road Safety Audit.

When taken together, all of the above issues are such that the development is considered to be contrary to local and national policy set out in the adopted local plan and the NPPF. We would therefore respectfully suggest that if the above issues cannot be satisfactorily addressed, that the only course of action is to refuse planning permission for the reasons outlined above.

We would welcome the opportunity to comment further should any additional relevant information be submitted.

Yours sincerely

A large black rectangular redaction box covering the signature area.

James Rand
Principal Transport Planner

A large black rectangular redaction box covering contact information.

Transport Planning



Highway Design & Civil Engineering



Travel Planning

ANNEX C: ALD Landscape review

Project Ref: ALD856_L200113

Date: 23rd January 2020



The Threshing Barn
Bignell Park Barns
Chesterton
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Development Manager
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Letter Raised in Objection to the Proposed Great Wolf Resort Development

Planning Application No.: 19/02550/F

Applicant: Great Lakes UK Limited

Application Type: Full Development

Case Officer: Clare Whitehead @ Cherwell District Council

Location: Land to the east of M40 and south of A4095 Chesterton, Bicester, Oxon

Proposal Summary: Redevelopment of part of golf course to provide new leisure resort (sui generis) incorporating waterpark, family entertainment centre, hotel, conferencing facilities and restaurants with associated access, parking and landscaping.

1.0 Introduction:

- 1.1 This letter is prepared by Applied Landscape Design Limited (ALD). ALD are Chartered Landscape Architects, and members of the Landscape Institute.
- 1.2 ALD are appointed in a professional capacity, by Chesterton Parish Council, specifically to review the landscape and visual impact assessment, and the landscape proposals submitted as part of the application. Other matters of significance, including ecology, highways and transport, economic need and employment analysis, provision of open space, sport and recreation provision, and compliance with Development Plan and associated planning policies, are commented on by other consultants in support of Chesterton Parish Council.
- 1.3 ALD operate out of offices at Bignell Park Barns, Chesterton, OXON, OX26 1TD. We are therefore 'neighbours' of the existing golf course and associated hotel and leisure facility – and are based within the Chesterton Parish.
- 1.4 The observations, and concerns, raised herein, are therefore based on the premise that (a) ALD are professional consultants complying with the code of conduct and professional guidelines associated with the preparation of Landscape and Visual Impact Assessments, (b) ALD are professional Landscape Architecture consultants with a detailed understanding of planning consultation processes, and (c) ALD work within the immediate vicinity of the development under review, with all members of the team commuting to the ALD office along roads which are located immediately to the side of the proposed development. We have family members living in Chesterton and a number of staff living in Bicester and the immediate environs. As tenants, we have in principle, the

we design // we deliver // we create
Applied Landscape Design Limited

ability to up and relocate if alternate and equivalent office facilities were available, and the adjacent proposed development were considered to be creating a significant impact on our operations – however facilities of the size and format we occupy in Chesterton are few and far between that would allow us to continue operating with our current team.

- 1.5 As a local practice, ALD do also have a vested interest in the local community with members of the team currently involved in the community volunteer work at the Burnehyll Woodland – a scheme which recognises the need for the protection of existing landscapes and the creation of new green areas and wildlife corridors in and around Chesterton.
- 1.6 ALD make note that in our professional consultancy capacity, we are involved in projects throughout the Oxfordshire and Cherwell District Council areas – with LVIA's and Landscape information being prepared in support of a range of project types.

2.0 Review of the Landscape and Visual Impact Assessment:

- 2.1 A review of the Landscape and Visual Impact Assessment is two fold in that (a) the process and outcomes as recorded and reported can be interrogated, and (b) the overall or cumulative impact of the proposed development can simply be considered.
- 2.2 In the context of the later, the sheer size and massing of the proposed development means it does not comply with the following statements extracted from Planning Policy ESD13:

'Development will be expected to respect and enhance local landscape character, securing appropriate mitigation where damage to local landscape cannot be avoided'.

And 'proposals will not be permitted if they would cause undue visual intrusion into the open countryside, cause undue harm to natural features, be inconsistent with local character, harm the setting of settlements, or harm the historic value of the landscape'.

- 2.3 Regardless of the initial assessment that the development does not align with policy, the LVIA is commented on as follows:
 - the LVIA is carried out in accordance with the now superseded 2011 guidelines, albeit the new guidelines have a grace period for those projects already submitted prior to the update
 - a review of the receptors raises a query about the scoping process and how the receptors were determined and whether the Landscape Officer assisted in defining those to be visited?
 - o Viewpoints 14b, 16 and 18 appear to be from private locations
 - o Viewpoint 17 appears to be from a private location (refer to ALD additional point D)
 - o ALD visited potential receptors at additional locations on the road to the south of the existing golf course (A and B), where the allotments and new housing development might offer potential views
 - o ALD visited the point (C) at which the new entrance cuts through the hedge, a receptor which will open up for vehicle users and cyclists (as no public footpath here other than walking along the road or grass verge – which does happen)

The following observations relate to a number of the individual viewpoints:

- **viewpoint 1a**, was taken at the end of April, with leaves on the trees and hedgerows. Receptors represented are defined as road users, yet this is also the access point to the PROW.

Everyone within the ALD team who has looked at the wireframe, feels the proposed building massing sits very low in the landscape – the trees in the background give a point of reference and a measurable height against which to anchor an 18m plus high structure. Confirmation of the positioning of the wire frame should be sought if this is considered contributory to the decision making process as ALD believe, with the inevitable changes to the boundary screening that arise from the footpath link, substation, utility connections and road widening, the hotel and leisure building and the extensive associated car parking will become visible.

Note: Direct views into the existing golf course are available pretty much the full length of the A4095 at this time of year (winter views) – the impact on these views into the course and what would be the proposed car park with built form behind – are not captured on any of the views along this boundary interface.

- viewpoint records associated with the PROW (**Viewpoints 1b and 3**) are included but no indication of the built form / massing is provided. These are considered to be receptors with direct views of the car parking, ancillary structures, the hotel and potentially the water park elements as pedestrians passing through the boundary hedge will see views across the development open up in front of them. The LVIA image for 1b is taken at the end of April and the trees are clearly in leaf – it doesn't therefore comply with best practice for assessing landscape impact.
- **viewpoint 2** from the bridge over the M40 to the NW of the proposed site, was taken in mid February, and is supported by a photomontages at year 1 and year 15. This viewpoint highlights the query as to what is on the motorway embankment and where the development boundary is? And at Year 1 confirms that the height of the development means a long flat linear structure becomes evident above the tree tops – something which is not occurring elsewhere in the landscape characteristic of this area.
- **viewpoint 4** from the bridge over the motorway to the south, provides the most telling image as to the scale of the development in an otherwise agricultural countryside setting. The existing agricultural building in the middle ground provides a valuable reference for a form of known height and size – a regular agricultural unit sitting in the landscape. The year 1 image illustrates the proposed development is clearly visible behind and above the existing trees – a continuous mass of roof and façade materials which forms a new horizon line. Even in the Year 15 image, with leaves on the trees the true scale and length of the proposed development is evident. Taken in the context of other views to architectural elements in the area, the sheer length and height is unprecedented in areas beyond settlement edges.
- **viewpoint 5** illustrates that change can and does happen, with localised utilities works having removed some of the planting shown on the western corner at the golf club boundary. This is unlikely to change the assessment findings, however as with image 1a, the wire frame seems low relative to the general lie of the land. A cross reference to the wire frame in image 14, where the road level is higher, would make the wire frame look to be sitting a different FFLs?
- **viewpoints 6, 7 and 8** appear to be representative, with **viewpoint 9** sitting out on the far side of the Weston on the Green RAF air base.
- **viewpoint 10** was visited, ALD believe this is recorded so as to illustrate the presence of the tree lined hedgerow close to the viewpoint.
- **viewpoint 14a** is visited by members of the ALD on a daily basis, the LVIA image was taken at the end of May and is showing vegetation in full leaf. The record notes do state its representative of a summer view. The equivalent winter, and night time views, with changes

to the roads, openings and entry points should be captured – this is highlighted in the wire frame view which indicates it's not visible. Lights from the existing club house, which is further away than the proposed lights in the car park, can be seen on a winters evening.

- **viewpoints 15, and 16** are similarly taken at the end of May
- ALD did not photograph from the **motorway**, but again the LVIA views were taken in May with all boundary planting in full leaf
- where other viewpoints (11, 12 and 13) were on publicly accessible land, ALD visited to check for any significant change in situation.
- with images having been taken between mid February and the end of May, there are a range of considerations in place between photos (light, weather, leaves) – this makes for an inconsistent basis against which to consider the assessment and the wire frame views prepared in support.
- the images taken around the immediate boundary give no indication of change to the boundary conditions, the wire frame placement of the proposed development in behind does not represent the changes arising to the boundary planting due to footpath access points, sub stations, incoming utility routes, road widening / turning lane introduction and opening up for the new access off the A4095

2.4 Placement of the proposed structure in the landscape at **viewpoint north B** (from the motorway) and **viewpoint north C** does suitably use 'colours' to illustrate the positioning of the proposed structure. Whilst these colours might accentuate the proposals, ALD do make reference to the fact that the entire corridor, and views along it, are green and naturalistic. Very few buildings are evident, and those that are agricultural structures – not rendered hotels with circular slides. As such any structure popping up or out of the landscape setting is deemed to be a change to the character and potentially erodes the green corridor.

2.5 **Viewpoint south B** from the motorway, illustrates the image of the golf course netting and the line of introduced evergreen trees. Whilst these look to afford screening to the proposed development, their medium to long term role in the landscape should be considered as any loss would significantly open up the views given the 4 storey plus height of the proposed buildings.

2.6 ALD do not propose to analyse each and every assessment of significance or definition of low, minor, moderate or major adverse. In general, those views around the site are however reported as being an assessment levels lower than ALD would expect. Illustrations include:

Construction Phase:

- Change to landscape character at site level: Moderate Adverse (not significant). ALD would consider this to be Major Adverse given the scale of landscape being lost, the changes to the PRoW and potential impact of construction activities on water bodies.
- Change to landscape character local: Minor Adverse. ALD would consider this to be Major Adverse given the scale of landscape and green infrastructure being lost in this open countryside setting.

Operation Phase Year 1:

- Change to visual amenity Viewpoint 4: Moderate Adverse (dropping to Minor-Moderate Adverse when mitigation measures are in place). ALD would consider this to be Moderate - Major Adverse given the scale of building that becomes visible is not in keeping with any built

form or structure anywhere in the vicinity of the Chesterton settlement area. And the mitigation measures proposed will have no Year 1 impact on reducing the assessment.

- Change to visual amenity Various Viewpoints: All seem to be missing reference to the impact of highway changes, opening up the entrance and impact of car parking and lighting. Current conditions, with leaves off the trees, allow visibility of lights around the existing club house and terrace. This can only change for the worse as the lights will be introduced to within 10m of the A4095 boundary and will be supplemented by the vehicles lights of those visiting the development.

2.7 Despite the written assessments presented by the LVIA, a review of the receptors, assessment of further potential viewpoints, consideration of the specific angle / heights of views and the type of viewer, the timing of the views and the wire frames prepared thereafter, leads ALD to believe that a development of this scale is likely (despite all the minor, moderate references) to be visually intrusive. The very scale of the structures, the amount of car parking, the loss of landscape, and the likely visibility through both daytime and evening operations, has a cumulative impact that is considered to be of significant impact, has the potential to cause undue harm to natural features, and does not respect or enhance the local landscape character.

3.0 Review of the Landscape Proposals:

3.1 The site is deemed to be outside the defined settlement boundary – and can therefore be recorded as being located within open countryside. The development as a whole, the introduction of a relatively flat faced building and façade of the size and scale proposed, the immense amount of car parking, the additional ancillary buildings and substation, the introduction of evening lighting, and changes to topography, does much to change the landscape character, impacts on the settlement boundary, creates a significant visual intrusion, reduces the landscape area, and erodes the feeling of ‘open countryside’.

In the context of this overarching statement, recognising that the proposed development is not in keeping with the local character, is not compliant with green infrastructure and local landscape protection policies, the following comments on the specifics of the landscape proposals are made:

3.2 The project requires a **Public Footpath** to be diverted (route 161/6) as it runs across the existing site on an alignment which is directly under the proposed building footprint. Any revised route would be subject to separate approval (i.e. planning approval does not constitute approval to a public footpath diversion).

The proposed route is not clear on the 4no. landscape general arrangement plans – and whilst the existing point of access into the site (at the existing vehicular gate off the A4095 close to the entrance to Bignell Park Barns opposite) is indicated as a future footpath point – the hedgerow symbols indicate continuous planting to the boundary (it is unclear whether this is existing to be retained or proposed). As such the aspirations for the footpath link, and retaining or imparting a continuous soft landscape buffer hedge are at odds and the LVIA hasn’t assessed the proposals in the context of such boundary openings.

Once on site, this footpath route wraps around the landscape area adjacent to the motorway – an area that is and will continue to be influenced by the noise of the motorway. The footpath is not identified as being the revised Public Right of Way – nor does it appear to cross the site and find its way out to the existing ‘exit point’. Any plans submitted therefore appear to be subject to further design development and change if a revised route is to be integrated into the proposals.

It is unclear from the layouts who this area is to be used by and benefit? There is just a single direct access point for the visitors attending the Great Lakes UK development off the courtyard area to the NW corner of the building. With the number of benches and picnic areas provided - it appears to be designed as a destination but the massing of the development footprint prevents the wider development from interfacing with or filtering into this area – in fact the ‘wing’ plan arrangement actually forms a blocker to the free movement of people into and around the area.

- 3.3 **Very few existing trees** are indicated to be retained with the site – many being removed by the vast rectangular areas of car parking. The graphics on the landscape plans are very faint in regard to the clarification of trees and landscape to be removed. Those areas retained are ‘graphic only’ using a standard CAD generated symbol and hatch with no use of topographic survey information. This makes it difficult to understand whether those trees to be retained are in fact viable, nor what is actually existing and to what extent.
- 3.4 **Existing landscape** to be retained particularly along boundaries, including the motorway boundary, is unclear. What is part of the project? What is part of the motorway embankment (and could therefore be removed by others)? Where are the root protection zones?
- 3.5 In driving the road every day, it’s a 2 lane carriageway. The entry configuration provides for a ‘turn right’ lane when travelling from the NW. How is this achieved and what is the impact on existing landscape and levels outside the project boundary?
- 3.6 Car park proposals to be softened by **beech hedges**, with planting areas defined by flush kerbs. Any planting proposals in this open countryside location should be native in form and format. A single species hedge, with soils receiving car park run off, does not appear to be in keeping with the landscape characteristics of the site or the local countryside environment.
- 3.7 **Earthworks profiles** across the existing site are characterised by shallow and smooth flow undulations, with low lying areas of water and golf tees boxes creating artificial elevated platforms. Proposed mounding up to 4m high is not considered in keeping with the natural landscape characteristics of the area. This treatment, generating slopes in excess of 1:3, creates soils which dry out and planting / trees which subsequently struggle to establish. This practice may achieve short term screening of ground level activities beyond, but the landform itself creates a visual impact which is significant to those in the immediate vicinity as it cuts of existing vistas. The treatment proposed will introduce an ‘artificial’ landscape element which has a notable impact on residents to the south, the golf course users and members of the existing leisure facility to the south, and any users of the public right of way (assuming that that is reinstated).
- 3.8 **New wildlife ponds** are shown to be provided to replace those lost. Ecological impacts, surveys, translocations and legal protections are not considered here by ALD, but we urge all consideration of the proposals to be holistic and as such these landscape elements and their contribution to the scheme can only be valid if the preceding activities and the relative protection and handling processes / programmes are in place.
- 3.9 **Tree planting species** can be a subjective consideration – having worked in the Cherwell District Council area we receive comments that are driven by aesthetic, native, and environmental considerations. We expect similar comments to be circulated by the tree and landscape officers in relation to this project, and whilst we urge due consideration to be given to their observations, we highlight the following:
- Oaks should be avoided at this time as the horticultural industry looks to limit the spread of Oak Processionary Moth (OPM)
 - Salix and its distribution requires clarification (utilities, foundations, water holding areas)

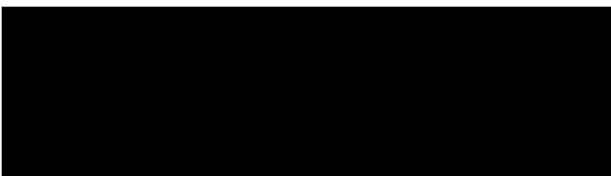
- Sorbus appears to be a heavily used species, although numbers to be planted as a percentage of the overall tally is not clear
- Species for use on mounds, in woodland mixes, as hedgerow supplements should all be native and as found in the existing mixes and hedges on site

3.10 **Entrance boulevard planting proposals** – makes reference to ‘disease resistant Elm if available’ and Large Pin Oak as an alternative. Neither are native to the location. And the movement of Oak trees is currently restricted due to Oak Processionary Moth. Whilst stock might be in the UK at the time of reviewing the proposals, no further material can be imported from Europe. As such stock is now limited, variable and relatively expensive, opening up a concern that the proposals as they stand are neither appropriate, nor deliverable.

4.0 In Conclusion

- 4.1 It is recognised that in raising these concerns and observations on behalf of Chesterton Parish Council, the information will be shared with the proposed development team and that elements ‘at odds’ with the procedures (such as photographs and assessments carried out in summer months) can be addressed and reworked by the developer to bring them in line with LVIA guidelines.
- 4.2 Regardless of this, and any potential changes to the LVIA processes and design layouts / species selections which subsequently arise, the impact both visually and in terms of change to the landscape character, is considered significant and a development of such a scale, footprint and massing is not commensurate with a site of this nature in this location.
- 4.3 The proposed project is therefore considered to be contrary to the following policies:
- ESD 13: Local Landscape Protection and Enhancement
 - ESD 15: The Character of the Build and Historic Environment
- 4.4 On this basis, Applied Landscape Design recommend the scheme should be refused.

Yours sincerely,

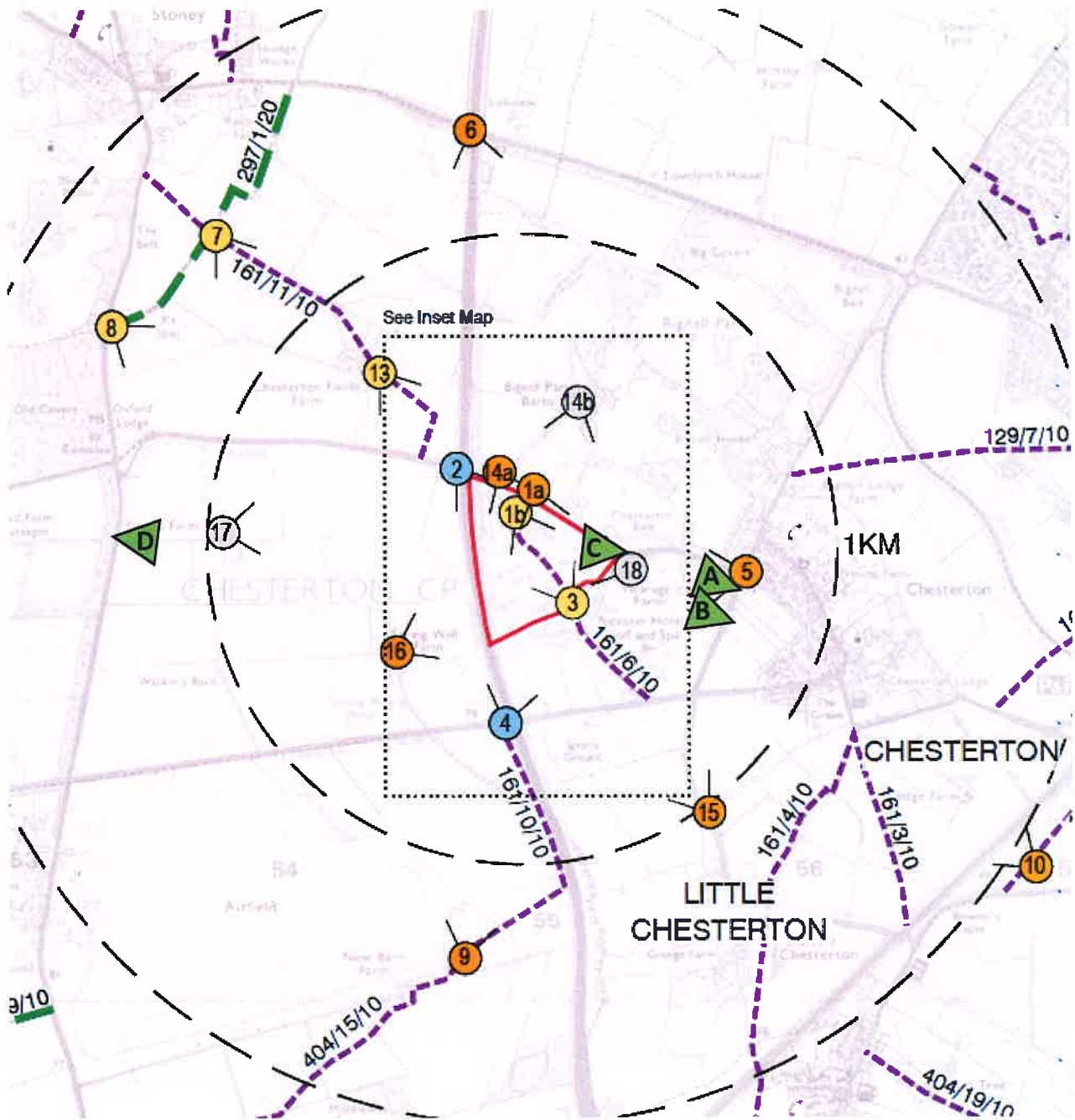


Kym M Jones (Mrs) BSc (Hons), DipLA, MLA(OSU), CMLI
Managing Director / Chartered Landscape Architect
Applied Landscape Design Limited

ALD Additional Viewpoint Locations

(not to be confused with the references Great Lakes UK Ltd use for their motorway views)

ALD potential receptors / viewpoint locations are represented in green with the letters A-D



ALD Potential Receptor / Viewpoints A, B, C and D

Photos were taken on the 18th December 2019, the weather was cool and dry with intermittent patches of sun in the morning and grey cloud by the afternoon. These images are taken in accordance with current LVIA guidelines, but as this is not deemed to be an LVIA in itself, the scale / size / referencing of the images here are purley for record purposes to illustrate attendance at the receptor locations

Viewpoint A is taken on The Hale at the entrance to the Allotments, looking west towards the site.



Viewpoint B is taken on Penrose Gardens, just off The Hale, looking west towards the site.



Viewpoint C is taken at the junction of the A4095 and Stableford Lane (current back of house vehicular entrance to the golf course), looking west towards the site.



Viewpoint D is taken from the B430 (Northampton Road) at the entrance to Simms Farm complex, looking east towards site.



ANNEX D: CDC Rec and Leisure response 11.12.2019

Consultee Comment for planning application 19/02550/F

Application Number	19/02550/F
Location	Land to the east of M40 and south of A4095 Chesterton Bicester Oxon
Proposal	Redevelopment of part of golf course to provide new leisure resort (sui generis) incorporating waterpark, family entertainment centre, hotel, conferencing facilities and restaurants with associated access, parking and landscaping
Case Officer	Clare Whitehead
Organisation Name	
Address	Recreation & Leisure (CDC)
Type of Comment	Public Art/Community Halls/Community Dev./Indoor Sports/Outdoor Sports
Type	Comment
Comments	<p>The planning application identifies the provision of indoor and outdoor facilities on site as part of the hotel and leisure complex, which the public will be able to access. The application also includes discounted day passes for nearby residents. Even though Well-being is not looking to seek any S106 contributions, it is important to comment about golf course provision. If Bicester Golf course reduces to 9 holes, this will only leave one 18-hole golf course in the Bicester area. With reference to the 2018 sports studies, Bicester currently has the lowest number of golf holes in the district per 1000 population. With the increase in population in the area through to 2031 and England Golf's aims to increase golf participation, increase number of members in clubs and the strengthening of clubs, the future golf provision in Bicester is showing a shortfall. The recommendation is that existing golf sites should be protected and that positive planning policies are adopted to enable the development of new golf provision. It is recommended Bicester will require an additional 18 hole or 2 x 9 hole golf courses and 7 driving range bays by 2031. To compensate for the loss of 9-holes of golf course provision, we would be seeking mitigation based on a positive approach to an increase in usage of the remaining 9-holes. This should be presented in the form of a development plan, showing how usage and accessibility will be increased, especially from the local community.</p>
Received Date	10/12/2019 11:54:51
Attachments	

ANNEX E: Chesterton Parish Council - Golf Report

**Review of Golf
for
Planning Application 19/02550/F**



**By
Chesterton Parish Council**

January 2020

1 Introduction

This report has been prepared by Chesterton Parish Council (CPC) following a review of the Planning Statement and CBRE's report commissioned by the Applicant to provide justification for the loss of 9 of the 18 holes at Bicester Hotel Golf and Spa (BHGS) golf course in Chesterton under planning application reference 19/02550/F.

The report is structured as follows: -

- Context – outlining why the Parish Council feels the applicant has not followed the correct consultation process
- Planning Policy Review
- A review of CBRE's Golf Study along with supplementary information from Members of the Bicester Golf Club
- Safeguarding the future of golf in the area – highlighting the proposed lack of investment into the remaining 9 holes course by the Applicant
- Conclusion

2 Context

The golf course is a key part of the village and being such a key stakeholder, the Parish Council would have expected to have been consulted at a very early stage regarding the proposed closure of half of the golf course. This did not happen. In fact, the Parish Council was unaware of any issues regarding the viability of the golf course or of the landowner's desire to reduce the course from the full 18 holes down to 9.

Given that the sale of this land will likely only bring further issues to his current businesses at this site, certainly over the short term, it seems that the owner would only allow this to happen as an exit strategy with an extremely large payment for the land.

From a review of Bicester Hotel Ltd's company accounts of the last two years they suggest no obvious issues with the viability/profitability in the golf element of the overall business. Shown in Annex 1 are copies of their Strategic Reports from their 2017, 2018 accounts and below are some key statements which, we believe, have great relevance to this application: -

2.1 Employment

Under Principle Risks and Uncertainties, the owner makes the point that due to the low unemployment rates in the area, staff recruitment and retention is of real concern. We have also spoken to other businesses in the local area and they too share this concern. The likely effect of a new business with the ability to attract new staff and requiring 600 full-time equivalent staff is likely to have a devastating effect on his and many other businesses.

2.2 Golf Viability

Review of Business Section it states 'Golf subscriptions have followed national trends, with continued decrease in membership numbers, however additional income from another golf segments have partially compensated for this and the contribution to golf operations has increased tremendously'

Again in the accounts ending October 2017 it is stated that 'Golf subscriptions have followed national trend, with a decrease in the number of members, however additional income from other golf segments have partially compensated for this and are expected to generate further growth in the future.'

Again, in the 'Principal Risks and Uncertainties' section of the accounts, there is no reference to the changing culture of golf and that growth could be achieved by changing the course from 18 holes to 9 holes.

2.3 Opportunity

The above extracts from Bicester Hotel Ltd's accounts serve to illustrate and support the surprise CPC received on notification of the applicant's desire to redevelop 9 of the 18 holes. There was no consultation from the landowner to explain the proposed development and there is no evidence to suggest the course was becoming unviable nor that the need of golfers was changing to require a 9 hole rather than an 18 hole course. If this was the case, the financial statements in the company accounts would have stated this. This therefore suggests that the proposal by Great Wolf (and thereby the landowner/owner of the golf course) is purely opportunistic in nature and biased. CBRE's conclusions regarding 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.

As outlined below in the planning policy section, Policy BCS10 specifically provides CPC with additional weight on such plans as the removal or reduction of such critical community facilities will have a material impact on the residents of the village and surrounding areas.

3 Planning Policy review

Policy BCS10 of the Cherwell District Local Plan Part 1 states that the Council will ensure sufficient quality and quantity of open space, sport and recreation provision by protecting existing sites and enhancing current provision. It goes on to state that the Council will be guided by evidence base and will consult parish councils together with potential users to ensure the provision meets local needs.

Furthermore the NPPF states that the access to a network of high quality open spaces and opportunities for sport and physical activity is important for health and well-being of communities and paragraph 97 of the NPPF states existing open space, sports and recreation buildings and land, should be protected unless certain aspects are met.

4 Review of CBRE's report and Planning Statement

Throughout the CBRE report and planning statement there are some fundamental errors and misconceptions which need to be addressed in order to fully appreciate and understand the impact of this development on the existing golf club and their facilities should the development go ahead.

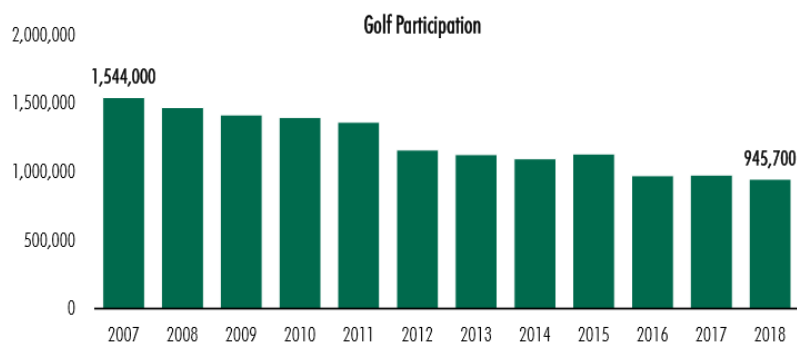
4.1 9 Holes vs 18 Holes

Golf has always been and will continue to be played over 18 holes and any club that wishes to provide to a sustainable membership which participates in matches, offers charity and society must retain the 18-hole format. As CBRE point out there are other formats of golf which have been created to attract a wider audience and therefore greater participation, but to fully provide for every format a club would need to be a course of 18 individual holes.

In 6.20 of the CBRE report they place great emphasis on the increased amenity value to the local population of a 9-hole course against the standard 18 holes. All courses in the area, including BHGS, currently offer any member of the public the ability to play 9 holes for a reduced fee. So, to continually make this statement throughout the document is not only misleading but incorrect.

4.2 Golf Participation Inaccuracies

Golf has been in decline, but statistics show that this decline has ceased and infact 2019 shows that there was an increase in Golf Participation despite CBRE deciding not to show this in their document, thereby providing misleading information on Page 9 of their report (Figure 1 below). We have included the statistics from the same Statista source which shows the 2019 increase in Figure 2 on Page 4. These statistics were available in July 2019 and should therefore have been included in the CBRE report submitted in November 2019. However, it would appear that they failed to include these statistics, thereby potentially misleading the reader.



CBRE

Figure 1 – Extract from Page 9 of CBRE's Report – no reference to 2019

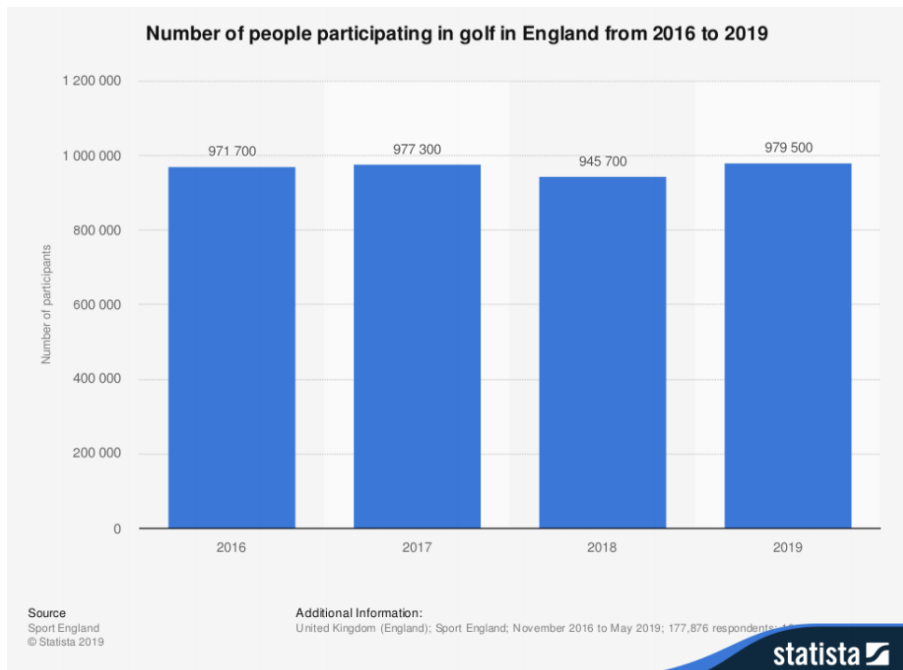


Figure 2 - Statista – Clearly displays an increase in 2019

4.3 Local Golf Provision

The Local Golf Provision map on page 16 of the CBRE report, along with Appendix B, both shown below, has a multitude of inaccuracies in it as the club numbers annotated on the map do not correlate in any way to the table of clubs. Some of the errors are shown below.

- 1 is not BHGS its Magnolia Park
- 3 is Studley Wood
- 4 is not Studley Wood and there is only 1 course near to Buckingham town centre.
- The remainder of the numbering system seems to be out by 1

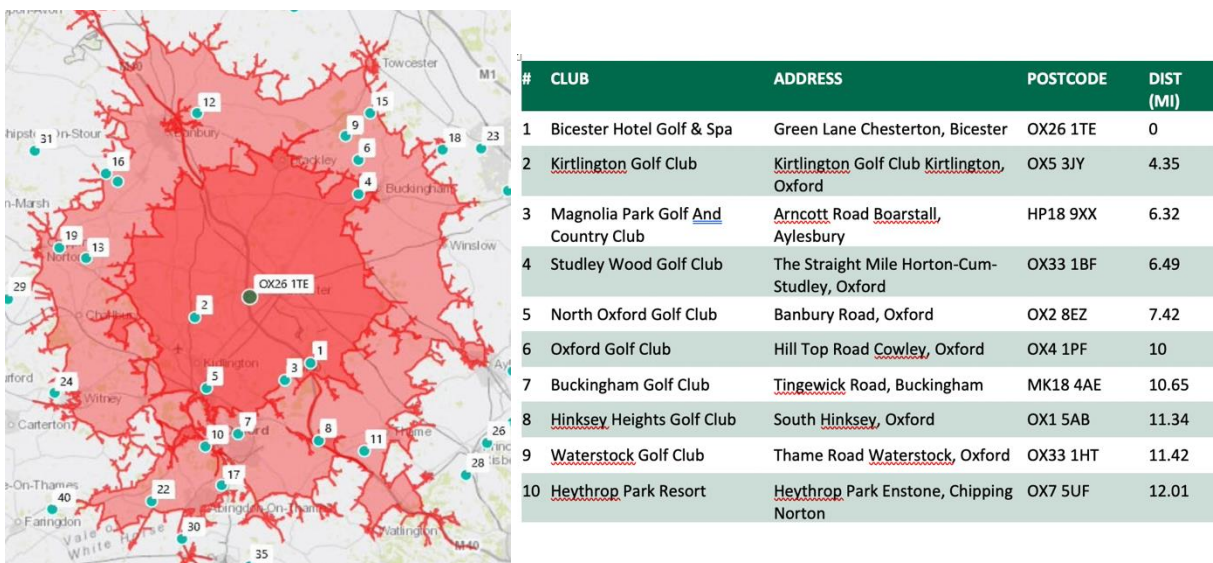


Figure 3 – CBRE Distribution of Golf Clubs in the Local Area

Due to the inaccuracies of the map provided in the CBRE submission it now reduces the courses available within a 20-minute drive to 4 not 5.

4.4 The Future of Members

The Parish Council has been in constant communication with the golf club throughout this planning process as they have a huge stake in the outcome of this application. During meetings with members of the golf club, they have provided shocking statistics that should the club be reduced to a 9-hole format course then over three quarters of the current membership would leave to join other clubs which offer the full 18-hole format.

This presents two further issues; primarily that over half of the current members live in the Chesterton and Bicester area, adding to the unsustainability and reliance on the use of the private car to travel potentially some distance to a new 18-hole club. Having spoken to the 3 clubs (Not 4 as in CBRE report) within 20 minutes' drive of BHGS there are only potentially 170 spaces available in total for full memberships which exceeds the likely 185 members that would be seeking a new membership in the event of the planning application being passed.

In addition to this, the continued development of Bicester's population and the surrounding areas means that golf provision in the immediate area of Bicester would be at maximum by the end of this year should planning permission be granted.

Our real concern is, given the huge investment likely to be in the region of £10M, coupled with the long return of investment of a quality golf course such as BHGS, should this application be passed, the facilities and amenity it offers will never be replaced.

5 Safeguarding the future of golf in the area

As outlined above, if this proposal is delivered, the remaining 9 holes will likely become unviable and this is supported by the survey undertaken by the existing golf club members. The number of members would reduce by c75%, significantly affecting the viability of the business unless a significant number of pay-as-you-play players started using the course which is uncertain. As such, it is very likely the front 9 holes will become unviable and in time the landowner would likely seek an alternative use planning permission to unlock additional value from the front 9 holes. This is a hugely significant concern of CPC.

Within various parts of the planning documentation, the applicant hints that the landowner of the front 9 will be investing in the existing 9 holes but there is no obligation put upon the applicant or landowner to do this.

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. Such improvements could have been as follows: -

- Creation of another 9 holes course (perhaps a par 3 course) somewhere else on the landowner's land holding – there is sufficient land within the landowner's retained land
- Improved, modern driving range with flood lights and bays
- Improvement plan of the retained 9 holes – improved bunkers, enhanced landscaping including new lake formations
- Improvement of tee off areas
- Improvement of greens
- New and improved buggies for hire
- Improved internal finishing of bar area / '19th' hole
- Improved and better stocked pro shop

These works could then be combined as part of this planning application and 'linked' and therefore the delivery of these improvements would be conditioned as part of the planning permission. This would mean that the improvement works would have to be completed prior to the commencement of construction of the Great Wolf Water Park thereby safeguarding the existing 9 holes.

It is the Parish Council's view that this should be offered as a bare minimum, as this is the only way Great Wolf can guarantee to the Parish Council and the local area that the golf provision will be protected in the area.

The Parish Council and Golf Society would like to be consulted on the improvement plans to the front 9 holes prior to agreeing the scope.

6 Conclusion

CPC are deeply concerned with the lack of consultation from the landowner of Bicester Golf Club and this proposal has come as a big shock to the Parish Council and the whole village. The golf course is a significant part of the village and removing half of the golf course will have a significant effect on village life. Cherwell is already losing one golf course in North Oxford for housing and with the potential for this to close, we will have little golf provision remaining in the area despite the fact that we are in a high population growth area trying to attract people to settle here who want golf facilities.

CBRE's report is hugely misleading in many parts. CPC is not resourced to check every fact and figure but, as outlined above, CBRE have specifically chosen to remove data which shows golf participation rates increasing in 2019 from the report, thereby misleading the reader. This puts into question whether any of the other data in the report has been skewed or incorrectly stated to mislead the reader and whether the report can be relied upon. The conclusion that there isn't a need for 18 holes at BHGS contradicts all other data and would appear to be convenient in so much as it meets the needs of the applicant. It is sincerely hoped that Cherwell will be able to see through this misleading information.

7 Annex 1 – Extracts from BHGS 2017 & 2018 Company Accounts

Bicester Hotel Ltd

Strategic Report for the Year Ended 31 October 2018

The directors present their strategic report for the year ended 31 October 2018.

REVIEW OF BUSINESS

The company saw a slight reduction in turnover over the previous year yet increased profitability through greater efficiency. The local rooms market had levelled out during the year following the introduction of additional rooms to the area in the previous period and that allowed the company to re-establish itself as a leader in the local market. Occupancy levels have recovered, and with a growth too in average rate, RevPar has increased. Golf subscriptions have followed national trends, with a continued decrease in membership numbers, however additional income from other golf segments have partially compensated for this and the contribution from golf operations has increased tremendously. The Health Club performance was comparable with last year with both sales and contribution seeing little change. However there are significant development plans for the coming year in this area which will see the offering greatly improved with some very unique facilities.

An increase in the National Living Wage was absorbed within an overall reduced payroll spend, compared to the previous year. This saving, along with other operational cost reduction initiatives, resulted in a net profit for the year of £264,860, a significant increase over the year ended October 2017 despite the reduced turnover.

PRINCIPAL RISKS AND UNCERTAINTIES

The principle risks to the business are expected to be the economy, local competition and employment. There remains an element of uncertainty with regards performance within the hospitality sector.

The local area enjoys a low unemployment rate which already puts pressure on recruitment. Brexit will bring with it further challenges in this respect and a strategy to improve staff retention and reduce the need for recruitment is in place. The staff are seen as a major asset which is set to be protected through improved, ongoing training and development.

There are plans for further increases in the number of bedrooms available in the local area, with a national chain recently announcing a new venture. We are confident that the demand will increase in line with the additional supply as Bicester continues to grow rapidly, with significant investment projected in both local housing and industry. Additional facilities are due to be added to the resort in order to ensure that market share is at least retained.


ANALYSIS USING FINANCIAL KEY PERFORMANCE INDICATORS

Room occupancy for the year increased from 82.0% to 82.7% and average rate increased by 0.6% from £99.49 to £100.09. RevPar was ahead over the previous year, £82.81 from £81.54, because of the increase in accommodation revenue whilst TrevPar was down from £267.54 to £262.96 because total revenue has decreased.

POSITION AT YEAR END

Net assets as at the year-end have increased over the previous period end and the company has seen a significant improvement in its forecasted cash flow position. Finance lease debt due after one year is falling as liabilities are repaid.

ON BEHALF OF THE BOARD:


Mr GJ Payne - Director

Date: 24 April 2019

Bicester Hotel Ltd (Registered number: 05997594)

Strategic Report
for the Year Ended 31 October 2017

The directors present their strategic report for the year ended 31 October 2017.

REVIEW OF BUSINESS

The company saw a significant drop in turnover over the previous year but this was due largely to the closure of The Oxfordshire Inn, a second property operated by the company throughout the course the prior year but which closed in December 2016. The closure of the Oxfordshire Inn contributed a reduction in turnover of £498k although, with much lower margins than the principle site, this had a much lesser effect on the overall profitability. A recent increase in the supply of rooms in the local area impacted rooms occupancy marginally, but growth in average rate compensated for this with RevPar only slightly behind last year. Golf subscriptions have followed national trends, with a decrease in the number of members, however additional income from other golf segments have partially compensated for this and are expected to generate further growth in the future. The Health Club performance was comparable with last year with an overall increase in membership numbers, although the average membership price was reduced due to the mix of categories sold.

An increase in the National Living Wage was absorbed within an overall reduced payroll spend, compared to the previous year. This saving, along with other operational cost reduction initiatives, resulted in a net profit for the year of £154,121, an increase over the year ended October 2016 despite the reduced turnover.

At the end of the financial year, the parent company successfully completed a refinancing exercise, resulting in a reduction in group financing obligations which will in turn greatly improve the cash flow performance for the company.

PRINCIPAL RISKS AND UNCERTAINTIES

The principle risks to the business are expected to be the economy, local competition and employment. There remains an element of uncertainty with regards performance within the hospitality sector.

The local area enjoys a low unemployment rate which already puts pressure on recruitment. Brexit will bring with it further challenges in this respect and a strategy to improve staff retention and reduce the need for recruitment is in place. The staff are seen as a major asset which is set to be protected through improved, ongoing training and development.

There are plans for further increases in the number of bedrooms available in the local area, with a national chain recently announcing a new venture. We are confident that the demand will increase in line with the additional supply as Bicester continues to grow rapidly, with significant investment in both local housing and industry. Additional facilities are due to be added to the resort in order to ensure that market share is at least retained.

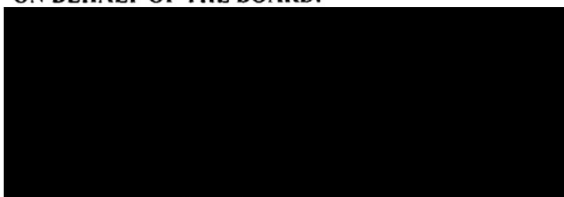
ANALYSIS USING FINANCIAL KEY PERFORMANCE INDICATORS

Room occupancy for the year dropped from 83.9% to 82.0% and average rate increased by 2% from £97.57 to £99.49. RevPar was slightly down, year on year, from £81.88 to £81.54 and TrevPar was down from £270.62 to £261.84.

POSITION AT YEAR END

Net assets as at the year end have increased over the previous period end and the company has seen a significant improvement in its cash balances. Changes in debtors and creditors reflect the refinancing of the group to enable hotel development and expansion. Finance lease debt due after one year is falling as liabilities are repaid.

ON BEHALF OF THE BOARD:



Date: 22/06/2018