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Ms Clare Whitehead
Case Officer
Development Management
Cherwell District Council
Bodicoat
Banbury
OX15 4AA

7th January 2020

Dear Ms Whitehead

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

I am writing to register an objection to the above planning application because:

1. It is purely speculative and does not comply with Cherwell's Local Development Plan and there are no material considerations that would warrant planning permission being granted.
2. There is no reason whatsoever for the first Great Wolf Lodge in the UK to be located on the site in question as it would not meet an economic need and would not provide facilities for local people, but would be geared to attracting visitors from further afield.
3. It would replace 46 acres of a mature green habitat on the edge of Chesterton where locals have enjoyed a quiet round of golf for years with a Great Wolf Lodge like those in states of America the size of California, Arizona and Colorado so that its American owners can expand 'overseas'.
4. The massive scale and function of the proposed facilities, geared to attracting 500,000 visitors a year, is totally inappropriate for the edge of a village like Chesterton (population c 1,000).
5. Having a footprint of 1.5 times the size of Bicester Village, it would have an unacceptable urbanising effect on Chesterton and the surrounding rural area.
6. There are a host of serious concerns and factors which all confirm its unsuitability, not just for Chesterton, but for the locality as well as for the District of Cherwell, the City of Oxford and for Oxfordshire as a whole. Those obvious to me are outlined below and overleaf.

Impacts on Traffic. The application would result in significantly greater numbers of vehicles on local roads, but would not meet a local economic need or provide needed facilities for local people. Therefore, it 'flies in the face' of crucial local initiatives¹ to reduce car use and would create a significant increase in carbon emissions. The 'worked example' overleaf based on the projected annual number of visitors alone travelling on single carriageways gives an indication of just how large the increase would be as well as the potential costs of off-setting. The actual costs would be much higher because a high proportion of families would travel at higher speeds on motorways.

¹ For example: Cherwell's and Oxfordshire's strategy for reducing car use; and Oxford City's £19 million investment to achieving net carbon zero sooner than 2050.

Estimated Potential Carbon Emissions from Visitors

Assuming there would be 500,000 visitors a year made up of families that travel 4 people per car, there would be 125,000 cars which would amount to 250,000 car journeys (including their return journeys).

If the cars were to travel an average of 3 hours each journey, at an average speed of 50 m.p.h. on national speed limit single carriageways (RAC figures), the 125,000 cars would emit 15,000 metric tons of carbon per year (based on esp.gov average carbon emissions for passenger cars).

Offsetting this by for example, planting trees in the UK would cost in the region of £193,000 per year (figures from carbon footprint.com). Presumably this cost would fall upon the Local Authority, specifically Council Tax payers.

It is acknowledged that some families may not travel by car, but the extra journeys families with cars make during their stays plus journeys made by conference attendees, staff, suppliers and contractors would more than make up the numbers.

Even before the Kingsmere Retail Park and Bicester Business Parks open, local roads cannot cope with traffic generated by Bicester Village so the last thing this area needs is another sizeable visitor attraction that aims for 500,000 visitors a year from outside the local area. The increased volume and weight of vehicles on narrow 'ancient' village roads would cause them to deteriorate even further making them more hazardous to drive along thereby increasing the risk of accidents and the cost to local residents of repairing and maintaining them.

There have been occasions when Little Chesterton and Chesterton have felt 'under siege' by Bicester Village traffic using village roads to escape hold-ups on the A41. The Great Wolf Lodge would make such events more of a regular occurrence particularly as by the time it opens, there would be even more traffic due to the completion of developments at Kingsmere and Bicester Office Park.

No one yet knows quite how much all these developments will impact on traffic flows around Bicester. However, this facility would undoubtedly exacerbate the situation. The proposed solution to instruct visitors and contractors to use the A34 and B430 instead of the A41 and A4095 would be ineffective because of Satnav and would only shift the problem elsewhere. Providing shuttle buses to and from local stations would not prevent visitors from using their cars.

Because of the difficulty of parents taking their children out of school during term times, the flow of traffic to and from the proposed Great Wolf Lodge would be more concentrated at weekends and during school holidays thus coinciding with peaks in Bicester Village traffic.

Sustainability Issues. There is no guarantee that the proposed Great Wolf Lodge would be viable particularly as it would be a new entrant to the UK market. Neither is there any guarantee that it would generate enough return on investment for its private equity fund parent organisation. Even the most successful company's ventures 'overseas' can fail - often because of unforeseen changes in 'local' circumstances and differences in consumer preferences.

The Great Lodge Hotel would be *larger* than many of its counterparts in America yet it is untested here and its popularity would not be as assured. It would not be a 'one-of-a-kind family resort' in this country. It would face robust competition from other well-established and very popular family

friendly resorts (for example, Center Parks, Gulliver's and Butlin's) as well as others due to open in the near future. And, none of these have accommodation within earshot of a major motorway.

The Great Wolf Lodge would, no doubt, make a great deal of being the first one in the UK. However, the novelty would soon wear off and, in 2024 it would be totally eclipsed by the London Resort located in Dartford, Kent. This £3.2 billion Disneyland theme park with 3,500 hotel rooms will quickly bring about a 'seismic' change in the geography of visitor attractions in the UK. It will have the magnetic pull of a 'supernova' drawing in families with children towards the south east of the country i.e. in a completely opposite direction from London to here.

The Great Wolf Lodge would fall back on Bicester Village visitors to boost its occupancy rates. This would change the proposition completely: instead of being primarily a family friendly resort, it would be more of a hotel with over-spill parking for Bicester Village. As such, it would duplicate facilities at Bicester's Park and Ride and undermine the viability of other local hotels.

Impact on the Landscape. The Great Lodge would dominate the surrounding rural landscape due to the 'industrial' scale of the proposed buildings, the climbing wall and the 84ft high tower. There would be limited scope on the site for enough landscaping to 'soften' the perspective and there are no contours to 'offset' the height of its buildings and other facilities. Note: there are only 5 common trees in the UK that can grow under ideal conditions to 84ft in maturity and they include Ash, which is under threat from disease and Elm, which is virtually extinct (tvc.org.uk refers).

Design. The proposed design is totally incompatible in form and function with its rural setting and does not enhance the character of the local area. It has the outdated appearance of a barracks or an eastern bloc institution of some kind. In view of the number of people to be accommodated, there are concerns about whether there would be sufficient capacity in the local infrastructure. For example, it would put considerable strain on local water resources², the sewage³ system.

There is also a question of where the 498 families would spend their time. Given that this site is small in comparison with other UK resorts, there must be an assumption that families would spend time off-site. This would lead to even more cars on local roads and an increase in carbon emissions.

Lack of Economic Benefits. The proposal would not fill an economic need as the local economy is thriving and is set to continue doing so for the foreseeable future. The proposed annual £2.4 million contribution to business rates is less of a deciding factor here than it might be in other areas such as those suffering from the decline of traditional industries. By locating here, the Great Wolf Lodge would actually find it difficult to recruit staff locally and would need to bring people in from further afield, thus, adding to the number of cars on local roads.

There is no guarantee that the notional economic benefits arising from its workforce or guests spending in the local area would materialise. There would also be little prospect of businesses in the surrounding areas benefiting because the Great Wolf Lodge would provide all-inclusive facilities for its guests. The proposed development would also give rise to significant 'dis-benefits' such as the extra cost of repairing and maintaining roads and carbon off-setting (see text box on Page 2).

² Enough water for an Olympic sized swimming pool would be needed for the indoor water park.

³ If all 498 rooms were occupied by families of 4, there would be an extra 1,992 staying overnight i.e. almost double the population of Chesterton.

Loss of Sports and Recreational Facilities. The Great Wolf Lodge would result in the loss of one of the very few places left in this locality where local people can undertake health and fitness activities in peaceful and relaxing surroundings. Not only would the golf course be halved, the whole ambience and immaculate setting of the Bicester Hotel, Golf and Spa could not help but be spoiled by having the Great Wolf Lodge as its neighbour. This would be a travesty as one of its key benefits for locals is that they can go there without having had to encounter Bicester Village traffic.

The promise of discounted day passes, which would probably only be available when there is spare capacity, would potentially only benefit those with small children rather than the whole community.

Ecological Impact. The proposal would have a devastating impact on a well-established green habitat at a time when vast swathes of green spaces in the locality are being lost to development. However, the difference in this case, is that there is no justification for replacing such a large area of greenery, shrubs and trees with 500,000 sq. ft. of buildings and a 900 space car park. It would inevitably affect a whole range of species some of which are being endangered.

The proposed landscaping and even the 5.75 hectare nature trail (on less than 1/3 of the 18.6 hectare site) would be mere *'tokenism'* and, it would hardly be *'natural'* because of high levels of disturbance and trampling. In addition, the whole development would negate the efforts made by Cherwell and local people to create Burnehyll Woodland as a buffer from urbanisation emanating from Bicester.

Concluding Remarks. It makes no sense at all for the first Great Wolf Lodge in the UK to be located here particularly as it would not meet any significant local needs. It would *'clog up'* local roads, impinge on the lives of local people, create a *'blot on the rural landscape'* and destroy habitats for wildlife. All of this would be to fulfil the ambitions of its American owners to expand *'overseas'* and meet the needs of people from outside this area rather than those who live here.

There is also a very *real* danger of it ending up as a huge *'white elephant'* because of the robustness of competition from other family friendly resorts. The London Resort (Disneyland UK) due to launch in 2024, would literally *'pull the rug from under its feet'* before it has even had time to carve out a secure niche in the UK market. This location would lose its allure and even advantages such as proximity to Bicester Village would pale into insignificance compared with the advantage of proximity to the London Resort. Clearly, common sense needs to prevail to avoid such an unfortunate eventuality for the sake of all stakeholders.

Yours sincerely



D. WINFIELD B.Sc.