

Comment for planning application 19/02550/F

Application Number	<input type="text" value="19/02550/F"/>
Location	<input type="text" value="Land to the east of M40 and south of A4095 Chesterton Bicester Oxon"/>
Proposal	<input type="text" value="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	<input type="text" value="Clare Whitehead"/>
Organisation Name	<input type="text" value="Lower Heyford Parish Council"/>
Address	<input type="text" value="Darville House, Station Road, Lower Heyford, Bicester OX25 5PD"/>
Type of Comment	<input type="text" value="Objection"/>
Type	<input type="text" value="neighbour"/>
Comments	<input type="text" value="See attached"/>
Received Date	<input type="text" value="22/01/2020 14:39:16"/>
Attachments	The following files have been uploaded: <ul style="list-style-type: none">• Lower Heyford Parish Council.pdf

SUSTAINABILITY

Lower Heyford Parish Council object to the Great Wolf application because it is a major visitor attraction in an unsustainable location - an out of town setting without public transport which encourages car travel. This is particularly important in view of its scale and the volume of traffic it will attract on local roads, already under strain from expansion at Bicester and Heyford Park.

The location does not comply with **NPPF Para 103** "*significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes: **Tourism Policy SLE3** "the Council will support proposals for new or improved tourist facilities in sustainable locations" and **Climate Change Policy ESD1** "distributing growth to the most sustainable locations as defined in this Local Plan".*

The proposal of a shuttle bus and cycle lane cannot sufficiently mitigate against the traffic impact. It is unrealistic to assume that families will travel to a station, arrive by train and then wait for a two hourly shuttle bus to take them to the hotel. The proposed half a kilometre of foot/cycleway along the A4095 to Chesterton will not only urbanise the area and take away much valuable verge and habitat, it will also have little useful purpose as visitors will not be coming from Chesterton village. The 898 space car park demonstrates dependence on travel by private car.

The loss of an 18 hole golf course conflicts with **Policy BSC10** which states that open space, outdoor sport and recreation provision should be secured by 'protecting existing sites'. **NPPF Para 97** states that existing open space, sports and recreation buildings and land, should not be built on unless "*the development is for alternative sports and recreational provision, the need for which clearly outweigh the loss*". There is no evidence of need for a Great Wolf resort in this location. By contrast, there is an identified need for more golf courses in the Bicester sub area by 2031 (see **CDC's Sports Facilities Strategy 2018**).

TRAFFIC

The traffic from the resort will put additional strain on already congested roads including the A34, A41, A4095 and B430. It will also affect local villages such as Chesterton, Middleton Stoney, Ardley, Weston on the Green, Kirtlington and Lower Heyford all of which have seen steep rises in traffic in recent years.

It is unrealistic that out of 1,977 forecast trips per day not one vehicle will be travelling on either of the two main routes west of Bicester, the A4095 or B4030. Lower Heyford lies on the B4030 and a recent OCC survey shows that 71% of our traffic arrives via Middleton Stoney. This is evidence that development in and around Bicester has an overwhelming impact on Lower Heyford - a fact still not recognised in traffic forecasts for this village from which Bicester development is excluded.

A proposal attracting such a large volume of traffic should not be approved while the impact of so much approved but 'unbuilt' development is not yet understood.

Lower Heyford now experiences over 800 more vehicles per day than it did two years ago (OCC traffic surveys 2017-2019). This rate of increase is not sustainable through a rural village and this is before the majority of Bicester and neighbouring Heyford Park development has been built out.

The two year construction period is also of concern. Lower Heyford saw an increase of 600 HGVs per day between 2017 and 2018 many of which were trucks with aggregate. We also have evidence that two thirds of HGVs come from the direction of Bicester. We know from experience that routing is ignored and not enforced. The impact of HGVs on village infrastructure has included repeated damage to Rousham Bridge (listed as medieval in origin and an important feature for Rousham Park), house shudder and burst water pipes under a road not designed to take these heavy loads. The outline construction programme estimates up to 130 loads per day in the first year and will include 30-40 ton HGVs. These should not be routed through rural villages. It further states that the number of deliveries excludes *'below slab drainage and services, external works including parking areas and landscaping, temp site access roads and site accommodation, ...'*

It is vital that the impact of traffic on the health/quality of life for local communities is taken into account in decision making. This has not been assessed in either the TA or the EIA. It is at a weekend, when residents are most able to enjoy village life, that the volume of traffic from the resort will be at its greatest, forecast to reach 2,761 trips on a Saturday. Traffic growth with its attendant problems of noise, vibration, pollution and safety has a direct impact on residents and visitors alike and discourages outdoor activities such as walking and cycling in surrounding communities. Lower Heyford is a conservation area, a destination for walkers, visitors on canal boat holidays and also to Grade 1 listed Rousham Park.

Traffic Assessment

Why has baseline traffic flow been forecast at 2026 when development at Bicester and Heyford Park will not be built out until 2031? In order to assess capacity on surrounding roads, it is important that all approved development is taken into account before Great Wolf traffic is added.

Future development at Bicester and HP is assumed to have no traffic impact on a Saturday because the TAs relating to their planning applications have not included Saturdays. This ignores the reality of the situation and is important in view of the greater traffic numbers the resort will attract at weekends.

Table 6.12 on p.23 shows that the Middleton Stoney crossroads will no longer be able to operate as it is forecast to be well over capacity by 2026. This is measured in degrees of saturation on each approach to the junction: Over 85% is regarded as congested and over 100% means that no further traffic is able to pass through. Here the four approaches at am peak measure 128, 147, 143 and 145% respectively. The TA argues that Great Wolf 's traffic will not have a 'material effect' on this junction. This cannot be true when 30% of its traffic is estimated to route through the junction - that is nearly 600 cars per weekday

and over 800 cars on a Saturday. It is argued that no further analysis is necessary because Heyford Park will provide mitigation measures. There are no details of this mitigation package or indeed whether it is able to solve the problem of capacity. Even if this were the case, the TA ignores the very obvious conclusion that adding yet more traffic to this location would compound a very real problem.

This is contrary to **NPPF Para 108** "*it should be ensured that ... any significant impacts from the development on the transport network (in terms of capacity and congestion) ... can be cost effectively mitigated to an acceptable degree*" and **NPPF Para 9** "*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.*" The cumulative impact on the Middleton Stoney junction would be severe. It also contravenes **Policy SLE4** "*Development which is not suitable for the roads that serve the development and which have a severe traffic impact will not be supported*".

DESIGN AND LANDSCAPE IMPACT

The site comprises a 898 space car park and its 500,000 sq ft of floor space is approximately twice the size of Bicester Village. The architectural design is of poor quality following a formula used on other Great Wolf sites in the USA. The design and proportions are totally out of keeping with the character of the area and are more akin to a prison in the elevation plans!

This is contrary to **NPPF Para 83** "*planning policies and decisions should enable sustainable rural tourism and leisure developments which respect the character of the countryside*", **NPPF Para 124** "*the creation of high quality buildings and places is fundamental to what planning and development process should achieve. Good design is a key aspect of sustainable development ...*" and **NPPF Para 127** "*planning policies and decisions should ensure that developments .. are visually attractive as a result of good architecture... are sympathetic to local character and history, including the surrounding built environment and landscape setting*".

This is also contrary to **Policy ESD13** where "proposals would not be permitted if they would cause undue visual intrusion into the open countryside" and "be inconsistent with local character."

The Local Plan refers to the designation of green buffers to the north and east of the site in order to protect the setting of Chesterton from further Bicester expansion. This protection is made meaningless if such a large and overbearing development is sited at the edge of the village.

ENVIRONMENTAL IMPACT

The proposal will occupy what is currently a greenfield site, irreversibly removing important green infrastructure and disrupting habitats. Before building, two metres of earth will be excavated from the entire site in order to lower ground level. This alone will have a significant ecological impact.

EIA regulations require consideration of the effects of a scheme on climate change yet it appears that 'Sustainability, Energy and Waste' has been scoped out

of the EIA. The scoping report states that *'through the application of the recommendations of the Sustainability and Energy Statements, the GHG emissions associated with the operational phase of the Proposed Development will be reduced. Therefore the contribution to climate change (in relation to GHG emissions) will not be considered further in the ES'*. Measures to reduce greenhouse gas emissions, although welcome, are negligible in comparison to the total amount of GHG emissions from construction and operation of such a large site. The resort will have no control over the GHG emissions from an estimated 1900 daily car trips over an estimated catchment area of up to 125 miles.

No assessment has been made of air quality on the B430 through Middleton Stoney despite traffic being routed along this road. Middleton Stoney is already monitored for poor air quality. The level of 33.6 nitrogen oxide recorded in 2018 is already near the AQMA level of 40. This is significant in view of expected increases in traffic from expansion of Bicester and Heyford Park.

ECONOMIC IMPACT

All family facilities are on site including accommodation, restaurants, retail, play areas etc. This does not encourage visitors to spend elsewhere in the district. The benefits of greater employment are questionable. Indeed local businesses are already finding it hard to recruit employees within the service sector that Great Wolf will be targeting. Employees are likely to come from other areas increasing traffic movements.

SUMMARY

This is a speculative development in open countryside which is not allocated for development in the Local Plan.

The site is unsustainable and encourages car use

It will add large volumes of traffic onto a sensitive road network upon which the full impact of approved development up to 2031 is not assessed.

Its traffic will result in severe cumulative impacts at the Mid Stoney crossroads.

Its traffic will have a social and environmental impact on neighbouring villages already experiencing rising volumes.

Construction traffic should not be routed through villages

The traffic mitigation is insufficient

The traffic forecasts may be unreliable for reasons stated

It will result in the loss of a valued 18 hole golf course in an area where more golf courses are identified as a need within the plan period

The scale and design will have a harmful impact on the rural character of the countryside and the village of Chesterton

The impact on wildlife and habitat will be significant.

The impact of greenhouse gas emissions in relation to climate change has not been assessed.

The proposal runs counter to relevant policies in the Local Development Plan and there are no material considerations that warrant planning permission being granted.