

# DEDHAM VALE SOCIETY

President: Robert Erith, TD, DL. Chairman: Charles Clover

Registered Charity No.: 246007

Mr John Davies  
Principal Planning Officer  
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PO Box 889  
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16 April 2009

Dear Mr Davies

**Horkesley Park Conservation and Heritage Centre  
Application No. COL/09/090231**

The Dedham Vale Society (DVS) has taken an active interest in protecting the Vale from inappropriate development since 1938 and today represents the interests of more than 800 members from the Dedham Vale and beyond who wish to defend the countryside in this area of national and international importance.

The DVS objects most strongly to the planning application to construct the Horkesley Park Conservation and Heritage Centre on both sides of the boundary of the Dedham Vale Area of Outstanding Natural Beauty (AONB).

The Society believes this is an inappropriate development, which would have a serious and permanent adverse impact on the whole of the AONB.

We believe that planning policies in place mean that this development should be refused on the grounds of its inappropriate scale, its impact on the AONB in all its aspects - including the natural beauty of the landscape and setting of All Saints, Great Horkesley, a Grade 1 listed church - because of its implications for traffic growth on the A134 and in the lane network of the Vale, the displacement of jobs and because it is in an inappropriate site for a retail development.

### 1) **Impact on the AONB.**

Planning Policy Statement 7, Sustainable Development in Rural Areas, from the Department of Communities and Local Government, states that AONBs have, alongside National Parks, “the highest status of protection in relation to landscape and scenic beauty.”

Para 22 of PPG7 states that “Major developments should not take place in these designated areas, except in exceptional circumstances.”

It concludes that “Consideration of such applications should therefore include an assessment of:

- (i) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
- (ii) the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and
- (iii) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

The Colchester Borough Local Plan (March 2004) Saved Policy CO2 states that where a development is likely to have an adverse impact on the AONB, it will be acceptable only “where an overriding national need for the development in that particular location can be demonstrated and there is a lack of acceptable alternative sites.”

In the Local Development Framework Core Strategy Document adopted by CBC in December 2008 there are specific protections for the AONB.

Spatial Strategy 4.1 Environment includes the statement “The Dedham Vale Area of Outstanding Natural Beauty will be protected from inappropriate development”.

This is taken further in 5.7 Environmental and Rural Communities Policies. ENV1-Environment states “In particular, developments that have an adverse impact on the Dedham Vale AONB will not be supported”

ENV2 allows “small-scale rural business, leisure and tourism schemes that are appropriate to local employment needs, minimise environmental impacts and harmonise with the local character and surrounding natural environment”.

**Horkesley Park is a major development. The projected visitor numbers for the first year of operation are 485,000 compared to Sutton Hoo (75,817), Flatford Mill (225,000) and Woburn Safari Park (454,000) (source: the application). These projections, if they proved to be accurate, would make it one of the top four attractions in East Anglia according to the East of England Tourist Board.**

**This is not a farm diversification scheme. The existing tomato greenhouses were owned by the applicant but the land in the AONB and the property known as the Chantry have been bought specifically for this project within the last decade.**

**Horkesley Park is, therefore, a major development but there are no exceptional circumstances or national needs which might suggest that it should be approved. We believe, given the very low levels of unemployment in nearby villages, that it is questionable whether Horkesley Park meets the test of need locally or within the AONB. In fact, its scale is likely to prove antithetical to the survival of many small-scale horticultural, catering and other businesses which the area depends on for its character. We are not aware that an assessment of the cost of siting the whole development outside the AONB has been made, nor have other sites been considered. Therefore, for all the above reasons, the application should be refused.**

## **2) Natural beauty, tranquillity and historic settings**

Section 85 of the Countryside and Rights of Way Act (2000) places a requirement on local authorities in exercising their functions to “have regard to the purpose of conserving and enhancing the natural beauty of the AONB.”

Colchester Borough Council’s Core Strategy, ENV 1, cited above, says that the AONB will be protected from “inappropriate development.” The Local Plan of March 2004, cited above, says that impacts should be subject to special scrutiny and where adverse impacts are likely, they will be acceptable only where there is a national need for the development.

**The Dedham Vale Society believes that Horkesley Park is an inappropriate development. The arrival of half a million visitors in the first year, more than 80 per cent of whom would come by private car, would be bound to erode the tranquillity of the area.**

**In addition to traffic noise, there will be increased light pollution and noise from the site itself, into the evening and most of the year round.**

**Noise from 3,000 and more visitors a day would not just be limited to the sounds of cars and voices, but almost certainly also include public address systems – not mentioned in the application but likely in a theme park. Public address systems for outdoor activities and “events” would make the impact wider, especially as this is a sloping site from which noise carries towards Nayland and the AONB. This disruption from noise is most likely to be evident at weekends and in holiday periods when other visitors and residents are enjoying the Vale. Noise from on-site activities post-construction is not even mentioned in the submission’s Noise Analysis.**

**Lighting of the buildings and car parks, and car headlights in large numbers, will be obtrusive at night, year round, and is likely to change the rural nature of this part of the vale to an urban one. The site is in an elevated position and even when the buildings and car parks are screened by leaves – which they will be only for part of the year - there will still be a glow around them at night which is inappropriate to the top of the valley in a protected rural area which is otherwise dark. (See Appendix 1 of this letter on the Institute of Lighting Engineers recommendations to local authorities on lighting within AONBs and national parks.)**

**The buildings proposed for the site will be larger than before and more visible in winter despite attempts at screening them with trees.**

**There would be an erosion of the agricultural character of the landscape around the Grade 1 Great Horkesley Church, which is within the AONB. A rural theme park is simply inappropriate to the setting of this ancient church.**

**For all these reasons, we believe the application qualifies as inappropriate development under PPS7; Colchester's Core Strategy, part ENV 1; its Local Plan of March 2004 and under heritage legislation and therefore it should be refused.**

### **3) Out of town shopping**

Planning Policy Statements 1 and 7 discourage major developments of any kind outside the envelope of existing settlements and in the countryside. We note that Horkesley Park is a departure from areas identified for development in the local plan of 2004 or the Local Development Framework Core Strategy Document of Dec 2008

PPS6 says that major retail and commercial developments should be as close to existing town centres as possible and imposes a sequential test for where developments should go if the existing centres cannot accommodate them. Out of town sites are bottom of the hierarchy and should not be approved.

**As proposed, Horkesley Park is a significant retail outlet, though the application documents seek disingenuously to minimise the significance of this. The documents show the revenue breakdown as follows: admission charges, 25 per cent; merchandising 54 per cent; food and drink 21 per cent, with a large floor area devoted to merchandise and food sales. The retail element (merchandising and catering) is therefore larger than at other large tourist attractions: ie 75 per cent retail rather than 54 per cent as a national average. ( Application Vol 2C p158) Therefore we believe the development must be considered against PPS6 – which says that retail developments should be fitted into local towns, ie Colchester, and as close to the centre of the town as possible.**

**Given the large retail element in the revenues projected for Horkesley Park, this application would more appropriately have been designated A1 Retail rather than D2 Assembly and Leisure.**

**We observe that the business case for the development is unconvincing. This is a unique project and must be considered high-risk. We would draw your attention to Tables 26 and 27 of the Tourism Feasibility Study, Technical Appendix, Volume 2C of the submission, which shows a return on investment of 11.1 per cent before financing charges and 4.2 per cent after them. These are not returns that are going to appeal to major investors. Appendix 2, compiled by the DVS, at the end of the letter, looks at visitor numbers and economics and suggests that the promoters must consider that higher visitor numbers than in the submission are more likely than lower ones.**

The viability of a scheme based on visitors paying an entrance fee to access the retail aspects of the proposed scheme is questionable. However calculated, the projected visitor numbers are at best speculative for a unique, ticketed venue in this location. It is clear that if the predicted attendance of almost half a million visitors in the first year fails to materialise, the proposed charge for entrance may have to be reviewed.

The present developers are a partnership but they say they will form a company to run the site with other business partners as yet undisclosed. The views and corporate strategies of those partners may turn out to be more significant as time goes on – and so the plans contained within the published documents may not be what ensues. The scheme, which already includes significant retail aspects, could change rapidly into one in which retailing is even more dominant to pay for the “heritage” and “conservation” aspects of the scheme.

Alternatively, the site could be sold, with the heritage and conservation elements assuming even lower priority for the buyer or being stripped out altogether, subject to consent which would be likely to be granted if the scheme was failing. It is not possible to insist that planning permission applies only to the present owners, therefore this scenario must be considered carefully.

We believe this application must be examined against PPS 1, 6 and 7 from the outset. As it is in the countryside, outside existing settlements and depends for its viability on a major retail element we believe it does not comply with national planning guidance and should be turned down.

An important precedent, when it comes to applying PPG6, is Application No: 071084 of August 1 2007. In the decision whether to allow a brewery to operate on the site of the Nursery, Nayland Road, Great Horkeley, CBC gave temporary approval until 31 October 2010. The conditions applied make interesting reading:

- “ 1. The temporary use hereby permitted is not appropriate for a permanent permission because of the location of the site within the countryside and on the edge of the Dedham Vale AONB.
  
2. No retail sales shall be carried out from the unit at any time to protect the amenities of the surrounding area and to comply with the Council’s retail policies.”

This sets a precedent for the site and we believe these policies should be applied again.

#### 4) Traffic

Nationally, PPG 13 encourages major developments to become more sustainable by encouraging people to travel there by a variety of means of transport. Locally the

Dedham Vale and Stour Valley Management Strategy, endorsed by Colchester Borough Council calls for tourism developments to be more sustainable.

**The developers estimate that over 80 per cent of the predicted visitors will be travelling by car and using the 200 parking spaces, the 400-500 overflow parking spaces or a further 500 spaces in the AONB.**

**The traffic analysis projects that a large percentage of Horkesley Park traffic will leave the A12 at the yet-to-be built Cuckoo Farm junction and proceed up the busy A134 to Great Horkesley. As yet only partial funding for that junction is in place.**

**There is likely to be congestion in the north Colchester area when the new junction is built. There is also likely to be pressure to upgrade the already busy A134 within the vale with lighting and widening surfaces which is out of keeping with the rural nature of the area in the AONB.**

**The A134 is a busy road and an already dangerous one. The accuracy of the personal injury accident figures in the application can be challenged. They do not appear to include a number of fatal accidents in the Great Horkesley to Leavenheath area.**

**Then there is the burden which will be placed on the side roads, almost all quiet and winding country lanes, many of them single track, by visitors to Horkesley Park exploring the surrounding area. The influx of almost half a million people a year reaching a peak of 77,000/month in the summer period will cause major traffic problems right across the AONB.**

**The submission argues that brown signs on the Cuckoo Farm A12 junction will ensure that 50 per cent of traffic from the Ipswich/A14 direction takes the route avoiding the AONB, even though it is longer and less congenial. Experience suggests that many drivers will leave the motorway system as soon as possible at any turnoff between Higham and Eight Ash Green and travel by country lanes to their destination. SatNav systems do not necessarily respect the best-laid plans of developers.**

**A particular concern is that visitors from the Ipswich direction who have come for a day out in the countryside will take the B1068/B1087 through Higham, Thorington Street, Stoke by Nayland and Nayland. On the applicants' numbers, peak traffic will increase by 20 per cent. If 90 per cent of Ipswich traffic takes the road through the AONB, that will be approaching 40 per cent. If visitor numbers reach 600,000 or more the traffic increase on the road through Higham will be closer to 50 per cent.**

**The road network also needs to be assessed for organic growth over the next 15-20 years. Would the AONB retain its character of tranquillity with the very highest projections of traffic that can be inferred from the application when the development is built? Would it after a few years growth? We believe the answer to both questions is No.**

The application envisages a “hopper” bus service from Horkesley Park to Flatford Mill, Carter’s Vineyard and Dedham, but it is unclear how often this would run or what levels of visitor revenue would be required for it to be viable. Public services have been tried, but failed due to lack of funding. It is more believable to assume that once people have brought their cars, they will prefer to use them to move onwards into the AONB unless there are venues that will only be accessible by “hopper” bus.

The application’s Travel Plan encourages cycling. The increase in traffic flows along the A134, which has no segregated cycle lane, are likely to make it even more dangerous for cyclists than at present, so the prospect of more people cycling from Colchester is unlikely to materialise, despite the developer making improvements to cycle routes locally.

The submission’s transport assessment confines itself to asking whether the roads in question have adequate capacity. This is the wrong question to ask. The question the planning guidance requires us to ask is “Will the scheme lead to a material increase in traffic through sensitive roads in the AONB and detract from its tranquillity?” The answer is clearly, “Yes.”

With all this in mind, the Travel Plan submitted by the applicant is inadequate and gives grounds for the application to be refused.

#### 4) Protected Lanes

Under Colchester Borough Council policy CO7 lanes of historic or landscape value are protected from development that would give rise to a material increase in the amount of traffic using them. In Little Horkesley there are three such lanes – Holt Rd, Workhouse Rd and Fishponds Hill. Fishponds Hill would suffer a significant increase in vehicular traffic because it is within 300 metres of the proposed facilities.

**Although not a protected lane, Water Lane, Little Horkesley, needs special consideration. It is winding and single track. However, the developer is planning to use it as a cycle route and for a bus service to Horkesley Park. The slow progress of the school bus up this lane most mornings would indicate that the lane is inadequate for these purposes.**

**There is a serious Health and Safety issue to consider with walkers, cyclists, horse riders, “hopper” buses, other vehicular traffic and agricultural equipment using single track roads.**

**The Horkesley Park scheme conflicts with existing policies on protected lanes, so it should be refused.**

#### 5) Creation/ displacement of jobs

The Core Strategy ENV2 talks of “schemes that are appropriate to local employment needs” but contains no analysis of the employment needs in Nayland, Horkesley or surrounding villages. The unemployment rate in these villages is currently less than 1 per cent and there is no proven need for employment opportunities but there are businesses

that could suffer loss of income. PPG7, above, talks about the requirement to establish the need for a development.

**The big selling point of the proposed scheme is more jobs. Councillors and officials may wonder how they can contemplate turning down an alleged 180 or so new full-time jobs in the middle of the biggest recession since the 1930s. They should be aware that this argument is illusory, for four reasons:**

- 1) Unfortunately, these jobs are not going to be created in the middle of the recession. The proposal depends on visitor numbers. It is unlikely to be funded or started until the recession is over by which time new jobs will be reappearing elsewhere.**
- 2) The project's capacity to create jobs has been over-stated. We refer you to our critique of the submission's analysis of the effects of the project on local employment, in Appendix 3 of this letter. In general, the number of jobs to be created is to an extent speculative and dependant on forecasts which may prove wildly wrong. In particular, the submission's estimates of the extent to which visitors to Horkesley Park will spend time and money off-site are wholly incompatible with the submission's claims that it will not flood the AONB with visitors and indeed will draw them away from the "honeypots" of Dedham and Flatford; and incompatible with the typical visiting party being a family on a day trip with substantial travelling to and from the site. Amending the estimates to reflect credible levels of off-site visiting reduces local employment creation to be about half that claimed in the submission. Appendix 3 also shows that an increase in visitor numbers, over those forecast, would not result in an increase in local employment, while a reduction in visitor numbers would lead to a reduction in local employment.**
- 3) It is unclear to what extent any new jobs will be "extra" jobs. The applicants admit that this project is damaging to other businesses in the vale - a relevant planning consideration. But the estimate of jobs lost in local businesses as a result of the new development has been massaged downwards, in our opinion, just as the number of jobs likely to be created has been massaged upwards. If Horkesley Park is successful, the negative impact on small businesses in the borough and its surrounding area could be considerable. Surrounding villages, in and outside the AONB, could be adversely affected. It is conceivable that the development will kill jobs of a retailing or catering nature within Colchester itself, a town centre of just the sort that PPS6 was written to defend, as well as in the surrounding countryside. It is well to point out that the, unquantified job equivalents to be created in the wider economy would not necessarily be in the immediate Colchester area.**
- 4) The critical point missed by the application is that if there are net jobs created there is no reason why they could not be created elsewhere in Colchester borough with the same levels of investment. The whole thrust of national planning policy is that the town is where retail development should take place to be environmentally sustainable and to bring about the renewal that all towns need.**



**We should like to remind readers of this letter that PPS6 is the culmination of 20 years of policy by governments on both sides of the political spectrum on the common understanding that what was good for the countryside was good for the town, and vice versa. If strong planning policies restrict development in the countryside, investment becomes available for the necessary regeneration of the urban fabric, where facilities can be accessed by more people using alternative and more sustainable modes of transport than the car.**

#### **5) Public Rights of Way**

CBP Policies L13, L14 and L15 and CBC Core Strategy ENV 1.

**Footpaths 3/4/5 run through the proposed Country Park. The intention appears to be that these paths will be fenced and hedged to prevent entry into the park without payment. Though the width of the paths is generous, there is nothing to prevent the hedges channelling the footpaths being grown to a height that would cut out both views across the proposed development and the existing stunning views across the AONB. Placing footpaths in hedge “tunnels” would detract visually from the enjoyment of the vale and are one of many reasons why this development would have an adverse impact on the vale and so should be turned down.**

#### **6) Heritage**

**Finally, a word about the “heritage” nature of the proposal, which has a bearing on the “need” for it under PPS7. An interpretation centre and gallery for the works of John Constable and local artists appears central to the project but its likelihood of success has been overstated. The gallery does not appear to have backing from, or partnerships with, any major lenders of pictures and the likelihood of the gallery attracting any major works of art from public collections is extremely unlikely. As Gainsborough’s House museum in Sudbury has said, there are two major problems. First, major public collections, such as the Tate, are not allowed to lend major, or even contextual works, to commercial ventures. Second, a commercial venture would not be able to obtain government indemnity against potential loss of the pictures. It would have to pay commercial insurance rates, which for major works would be cripplingly expensive. The heritage nature of this scheme is likely to remain more a dream than a reality.**

**For all the above reasons, we strongly recommend refusal.**

The Dedham Vale Society would be grateful for an opportunity to put these arguments in person to the planning committee when the application comes to be considered by CBC.

Yours sincerely

Charles Clover

Chairman

The Well House, High St, Dedham, Colchester, C07 6AB.

### Appendix 1: Lighting

The Institute of Lighting Engineers recommend that Local Planning Authorities specify the following environmental zones for exterior lighting control within their Development Plans.

Category	Examples
E1	Intrinsically dark landscapes (National Parks, Areas of Outstanding Natural Beauty)
E2	Low district brightness areas (Rural, small villages or relatively dark urban locations)
E3	Medium district brightness areas (Small town centres or urban locations)
E4	High district brightness areas (Town/city centres with high levels of night time activity)

Where an area to be lit lies on the boundary of two zones, the obtrusive light limitation values used should be those applicable to the strictest zone.

### Appendix 2: The visitor, traffic and economic estimates

Much of the rationale for the application is founded on numerical estimates, eg of jobs created, economic viability, road traffic. These estimates are all derived from estimates of visitor numbers.

The supporting documentation for the application (“the submission”) presents all these estimates as *single numbers* – as against ranges or alternative possibilities – and as if *certain* – as against recognising and analysing the possibility of error.

This note argues:

1. Even if the submission's estimates were certain to be valid as central estimates, the range of probability around them would be very wide, and the effects of over-estimating do not cancel out the effects of under-estimating;
2. The proposers probably believe that the estimates in the submission are on the low side, and that it is much more likely that actual numbers will be higher, than that they will be lower;
3. The submission's estimates could be seriously wrong, as central estimates.

### 1. *The range of probability*

It is obvious that prediction is subject to uncertainty. But for many purposes this uncertainty is ignored. The argument for ignoring it is that the actual outcome is as likely to be below a good central estimate, as above it, and that the probability of over-estimating cancels out the probability of under-estimating. Therefore all that is required is to generate a good central estimate. "Swings & roundabouts" apply. This approach makes for much simpler and clearer analysis and presentation.

(It is also obvious that visitor numbers and spend will fluctuate from year to year, with weather and the business cycle. Any single-number estimate must implicitly be an average over a normal business cycle and against the normal variation in weather.)

In the case of the Buntings proposal, the "Swings & roundabouts" argument is not valid. Assume for the sake of argument that the key input estimate, of visitor numbers, at 485,000 in 2011, is a correct central estimate for the whole period required for viability (probably 2011 -2020) ie that the probability of the actual numbers being higher than 485,000 in any year is the same as the probability of them being lower. Then recognise that the range of this uncertainty is very wide (see section 3 below).

Suppose there is a one-third chance of visitors averaging 150% of the central estimate (ie 720,000 per year) and a one-third chance of them averaging 67% of it (ie 320,000 per year). With the high figure, the traffic and noise dis-benefits would be correspondingly greater, but the employment benefits would not. The same staff would simply sell more tickets, serve more meals, etc. With the low figure, the project would not be viable (see 2 below for detail). If actual numbers proved materially lower, either it would simply close, and both on-going benefits and dis-benefits would be zero. Or it would be stripped of the non-viable cultural elements, and end as an over-blown garden centre-cum-farm shop.

The crucial point here is that a symmetrical probability distribution around the central estimate for visitor numbers, results in a highly asymmetrical distribution of the benefits and dis-benefits.

### 2 *The proposers' likely beliefs*

The submission's discussion of financial viability is summarised in Volume 1, Section 9.15, which states that

"a trading profit of just under £3.6 million can be expected from the first year of operation, which provides a return on investment of 11.1% after taking into account depreciation. After taking account of the non-trading overheads there is a net pre-tax profit of just under £1.2 million."

The profit after overheads amounts to a return on total investment of 4.2% (Tourism Feasibility Study, Tables 26 & 27). Savings accounts with banks such as Santander and

Halifax will pay comparable rates for deposits of a year or two<sup>1</sup>. A 10% reduction in revenue wipes out the return to shareholders.

An RoI of 11% before non-trading overheads (actually, financing costs – see table 26) is too low to represent an attractive investment opportunity, given the real risk that the whole enterprise fails. See, for a convenient reference, Wikipedia on “Hurdle rate of return”: more than 12 % required in volatile markets.

From the point of view of the promoters, the submission’s estimates have to be cautious, low-end, figures, with the probability of higher figures being perceived as much greater than the probability of lower figures.

### **3      *The possibility of serious error***

It is possible that the central estimate in the submission is seriously wrong as a central estimate. There are at least three different kinds of reason why, even with the best professional advice, such an estimate might be quite wrong even as a central estimate:

- The world has recently entered on a recession more severe than any in the last 70 years. It may recover, to resume moderate unemployment and positive growth, in the next couple of years. Or it may embark on a prolonged slump, like Japan in the 1990s or America in the 1930s;
- The mix of culture and retail in the Buntings proposals is unusual. It might prove very popular, or a lead balloon;
- Those putting forward the proposals may have chosen to present the proposals in a particular light eg to facilitate gaining planning permission. The analysis at section 2 above suggests that the submission’s estimates are biased downwards.

It is possible to provide evidence of the range of visitor numbers to similar attractions, to support both the thesis that the submission’s estimate is highly optimistic, and the thesis that it is misleadingly cautious. All figures below come from the 2007 Annual Visitor Attractions Survey conducted by VisitBritain, the Government-funded body to promote tourism in Britain.

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<sup>1</sup> AA: 3.76% AER fixed, for 11 months; Cahoot: 4.01% fixed, for 2 years

The argument that the submission's estimate is optimistic is supported by the visitor figures for paid-entry attractions in the east of England:

<i>Attraction</i>	<i>No. of visitors</i>	<i>Adult entry cost</i>
Woburn Safari Park	470,000	£17
Willows Farm Village, St Albans	320,000	£11
Southend Pier	243,000	£3
Kings College Chapel	234,000	£4.50
Banham Zoo, Norfolk	198,000	£12
Aldenham Country Park, Herts	183,000	£5

The submission's estimate is higher than any of these. The only two that have visitor numbers materially more than half of the submission's estimate (ie more than 242,500) have much more populous catchment areas than Colchester.

The argument that the submission's estimate could well be pessimistic is supported by the visitor figures for paid-entry attractions, of a rural/gardening/natural world type, in England as a whole:

<i>Attraction</i>	<i>No. of visitors</i>	<i>Adult entry cost</i>
Kew Gardens	1,320,000	£13
Flamingo Land, Yorkshire	1,310,000	£20
Eden Project, Cornwall	1,128,000	£15
Studland Beach & Nature Reserve, Dorset	1,000,000	NA
West Wittering Beach, W Sussex	1,000,000	NA
Bradgate Country Park, Leics	900,000	£2
Stonehenge	869,000	£6.50
RHS garden, Wisley, Surrey	802,000	£1

The submission's estimate is one-third of the highest, and not much more than half the lowest, of those listed. By no means all of these are in heavily-populated areas.

### ***Conclusion***

An objective appraisal of the consequences of approving the Buntings submission needs to take into account the real possibilities of the actual number of visitors being (a) much less than in the submission; (b) much more.

If the numbers were much less, the project would not be viable, and a plausible outcome is that the site becomes nothing more than an over-blown garden centre-cum-farm shop. If the numbers were much more, the benefits to the community (jobs) would not increase pro rata, but the dis-benefits (traffic etc.) would.

### Appendix 3: Local employment effects

This commentary focuses on the local employment effects, defined as those in the area within 30 minutes drive of the site. It starts from the analysis in the submission summarised at Volume 2B, 10.1, Table 10. A copy of this table is attached.

This shows:

Local jobs during the construction phase are negligible, because most will go to contractors from elsewhere (Volume 2B, 10.1, 1.23 & 1.24)

Local jobs when the project is operational are made up as follows (rounded to whole numbers of full-time equivalents (FTE)):

<i>Source of jobs</i>	<i>FTE</i>
On site	116
Indirect, from expenditure by employees and the project	35
From visitor spending off-site	99
<i>Less jobs elsewhere displaced</i>	<i>-74</i>
<b>Net employment creation</b>	<b>180</b>

### *Exaggeration of benefits*

Study of the analysis shows areas where the benefits have been exaggerated:

“Deadweight loss” (ie loss of the jobs that would otherwise exist on the site) has been set at zero (Volume 2B, 10.1, 1.55 & 1.56). This is unreasonably low. Even after years of rundown 3 FTE are employed. If the scheme does not proceed it is reasonable to consider some other use would be found for the site. Quantifying this would be speculative, but a deadweight loss of 3 FTE is a minimum.

The “displacement loss” (ie of jobs elsewhere that would otherwise exist) has been reduced by 10%, on the grounds of prospective economic growth (Volume 2B, 10.1, 1.65). This is incorrect: economic growth does not reduce the number of jobs displaced but simply the proportion they bear to the economy at large. Correcting this increases the local displacement loss by 8 FTE.

The calculation of jobs created by visitor spending off-site depends on the difference between past average visitor spend in the area and forecast spend in Horkesley Park (Volume 2B, 10.1, 1.40 & 1.41). This assumes that past visitors and Horkesley Park visitors are on average the same. This is most improbable. The project is designed to attract large numbers of people who would otherwise not come as tourists to the region. More likely is that most Horkesley Park visitors confine themselves to the site. Given average time on site is 3 hours 41 minutes (Volume 1, 9.14.7) and that most will be family parties with substantial travelling time to and from site, anything else is not credible. This is important in a wider sense: otherwise, the benefits claimed by the submission, in terms of acting as “a counter-magnet to honey-pots within the Vale” (Vol. 1, 4.3.32), fall.

The figures in the submission imply that off-site spend in the area will be 64% of that on-site (99/155: local off-site spend jobs divided by total on-site jobs (not just local on-site jobs as in the table above). Putting it in terms of time spent, on the basis that employment created is proportional to money spent and that money spent is proportional to time, the submission implies that the average visiting party will spend 3 hours 41 minutes on site and 2 hours 21 minutes elsewhere in the Vale). It is suggested that a more credible model is of 80% confining their visit to the site, with 20% spending an average of 2 hours 30 minutes elsewhere in the Vale. This implies an average of 30 minutes off-site. On the same basis of off-site spend jobs and off-site time being in the same ratio to on-site jobs and on-site time, off-site spend jobs are  $155 \times 30 \text{ minutes} / 3 \text{ hours } 41 \text{ minutes} = 21$ . That is, a credible model of visiting patterns, consistent with limited impact on the Vale itself, reduces jobs arising from visitor spending off-site by 78.

The net effect is that the table above becomes

<i>Source of jobs</i>	<i>FTE</i>
On site	116
Indirect, from expenditure by employees and the project	35
From visitor spending off-site	21
<i>Less jobs elsewhere displaced</i>	-82
<i>Less deadweight loss</i>	-3
<b>Net employment creation</b>	<b>87</b>

There may be other questionable aspects which have not come to light in the time and with the resources available.

#### ***Effects of higher or lower visitor numbers***

It is important to consider the employment effects if visitor numbers are significantly higher, or lower, than in the submission's analysis.

If visitor numbers are higher, on site employment will not increase materially. The facilities on site will provide for a given number of receptionists, cashiers, catering staff, etc. The hours the site operates will not increase. Other than marginally, there will simply not be workplaces available to employ more.

There will be some increase in indirect employment, from goods and services bought-in by the project, and some increase in off-site visitor expenditure. There would also be a considerable increase in job displacement, as a result of the higher purchases on-site.

On this basis, a 25% increase in visitor numbers would not increase net employment.

Indeed, the increase in job displacement could well outweigh the increases elsewhere.

If visitor numbers are significantly lower than in the submission's analysis, the outcome would be different. On site employment would reduce. The limits set by the physical facilities on increasing employment do not apply to reductions. If there are 10 check-outs, no more than 10 check-out staff can be employed at any time, but it is easy to

employ less than 10. The other sources of employment (or loss of employment) would also reduce, except for the deadweight loss.

Assuming a 25% reduction in visitor numbers resulted in a 15% reduction in on-site staff and a 25% reduction in indirect employment and off-site visitor expenditure, net employment would reduce from 97 to 79.



## Submission Volume 2B, Table 10: Overall Employment Impacts

	<i>Local</i>	<i>Essex and Suffolk</i>	<i>East of England</i>
Development Phase	4.5	9.0	13.4
Direct Operational Jobs			
<i>Full Time (FT)</i>	<i>63.0</i>	84.0	84.0
<i>Part Time (PT)</i>	<i>106.5</i>	142.0	142.0
<i>Total FT and PT jobs</i>	<i>169.5</i>	226.0	226.0
Total FTE	116.3	155.0	155.0
Induced Employment	15.5	27.1	38.8
Indirect Employment 1st Round	18.6	40.5	67.9
Indirect Employment 2nd Round	1.0	4.6	10.9
<b><i>Total Direct, Indirect &amp; Induced Employment</i></b>	155.8	236.2	285.9
Off Site Visitor Spending	99.0	83.4	62.7
<i>less Potential Displacement</i>	<i>-74.4</i>	<i>-119.1</i>	<i>-178.7</i>
<b>Net Employment Creation</b>	<b>180.4</b>	<b>200.5</b>	<b>170.0</b>

Note 1: FTE - Full Time Equivalent

Note 2: *Local* defined as the area within 30 minutes' drive of Horkesley Park

Note 3: *Essex & Suffolk* includes *Local*; *East of England* includes *Essex & Suffolk*