

STOUR VALLEY ACTION GROUP

Response to Application 120965

July 26th 2012

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Ms Sue Jackson,
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July 26th 2012.

Dear Ms Jackson,

The Stour Valley Visitor Centre at Horkesley Park; proposed change of use of land by Bunting and Sons, planning application No 120965 (re-submission of application no 090231)

1. Introduction:

The Stour Valley Action Group (SVAG) strongly objects to the plans for the Stour Valley Visitor Centre at Horkesley Park (Horkesley Park) for the primary reason that if Planning Consent were to be granted it would do irreparable damage to the peace and tranquillity of the Dedham Vale Area of Outstanding Natural Beauty (AONB), which is celebrated for these very characteristics. This must not be allowed to happen in the name of short-term financial gain for Bunting and Sons (the Applicant). Furthermore we contend that the Application cannot be given consent under National, Regional and Local Planning guidelines, both generally and particularly as they relate to AONB's, and must be refused.

As our primary objections to Horkesley Park are based on the interpretation of the scheme in the light of planning law and policy, we have instructed independent expert planning consultants, Pomery Planning Consultants, to consider the Planning Policy aspects of the Application. Their report is at Appendix 1 and forms the basis for the objections that we expand upon below.

The Stour Valley Action Group (SVAG) was formed as a properly constituted representative body in June 2001 in response to the Applicant's first proposal for "The John Constable Countryside and Heritage Park". It now has an active mailing and e-mail list of over 720 members. Its primary Term of Reference is to "*Expose to full public scrutiny the Planning Application for the John Constable Countryside and Heritage Park and any variation to such Application*". The current Application is thus covered by the Terms.

By way of introduction, we note that even LDA Associates, who are one of the Applicant's main consultants, in a document prepared for the Countryside Commission in 1997 on the Dedham Vale, state:

"it is the absence of public awareness and pressure that has preserved much of the charm of the Vale, contributing to its timeless, quiet and undiscovered character."

They are now supporting a scheme that would completely negate these characteristics for which the Vale is properly celebrated and we find it difficult to reconcile such conflicting approaches from the same organisation.

We have examined the Proposal in detail and our views are expressed in this letter.

2. Summary of Key Objections:

- **The Application is contrary to the whole ethos of government and local planning policy and must be rejected on these grounds alone. A full review of planning policy issues is given in Appendix 1.**
- **The Application would compromise the peace and tranquillity of the AONB in a totally unacceptable way. The AONB is protected by National, Regional and Local planning policies.**
- **No need has been established for the Application on a Regional basis. All its elements, and more, are available elsewhere in East Anglia.**
- **Visitor numbers are likely to be closer to 150,000 than the 316,250 predicted by Sykes. The Application is not of Regional significance.**
- **There is so much doubt about the reliability of the tourism data supplied that the Council is strongly advised to have the conclusions of the Sykes report tested by an independent consultant.**
- **The project is predicted to make a loss before interest and tax of £2.5m. At the very least, we presume that the Council will get independent advice on financial viability.**
- **Sales other than entry fees will probably account for 48% of sales. The claim that retail sales are ‘ancillary’ is not justified. It is of concern that the Council has apparently accepted that retail sales would be ancillary.**
- **The job numbers predicted cannot be relied on and are likely to be much less than the 106.5 FTE on-site jobs predicted. This number cannot be secured through a S106 agreement.**
- **The impact of additional traffic on secondary routes to the site and minor roads has not been properly examined.**
- **We remain concerned about the impact of additional traffic on the Protected Lane which is Fishponds Hill.**
- **Horkesley Park takes very little account of noise generated by people. The tranquillity of the Church, churchyard and across the Valley will be considerably compromised by noise, particularly at weekends. Up to**

3000 people per day can be expected on peak summer weekends. Noise from such a large number is potentially very intrusive.

- **It will be difficult to control light pollution particularly if the site is used for evening functions.**
- **The Application would generate at least an additional 3000 tonnes of carbon dioxide per annum from visitors' car journeys alone. The Applicant has not assessed the overall carbon footprint of the development.**
- **An ADAS (Agricultural Development & Advisory Services) report commissioned by SVAG shows that the glasshouses could still generate an adequate return from horticultural activity.**
- **The site should not be regarded as agriculturally redundant and the conversion of a Grade 2 field into an overflow car park should not be permitted within the guidelines.**
- **At the date of writing there are 547 letters of objection and 297 in support. Those objecting include the Dedham Vale Society, the Colne Stour Countryside Association and Nayland with Wissington Conservation Society. They represent an aggregate membership of 1938 people (2658 including SVAG). The strength of opposition cannot be ignored.**
- **Any decision to approve the Application would create a precedent for such intrusive developments that could affect all AONB's in the Country.**

3. Planning Category and Land Use Allocation:

The Applicant has applied for D2 use (assembly and leisure). We consider that Horkesley Park as proposed is likely to derive up to 48% of its revenues from retail activity (see Section 7 below). The Application category should reflect this.

Horkesley Park is a re-submission of 090231, and is outside the provisions of the Colchester Borough Plan and has been designated a "Departure Application". As such, we understand that approval by Colchester Borough Council would require reference to the Secretary of State for his approval which might result in a Public Enquiry.

Most of the site lies within the Dedham Vale AONB and Countryside Conservation Area. It is designated as countryside in the Local Plan.

Fishponds Hill, as one of the site boundary roads to the south and west, is a Protected Lane defined as such in the Colchester Borough Plan of 2004.

4. Relevant Planning History:

It is contended that original planning permission was granted for development of the site for the sole use for horticultural and agricultural purposes taking into account its sensitive location and that the residential buildings – Hillside (proposed park manager's house) and Broadacres (proposed farm manager's house) were built with these conditions attached. The current proposal conflicts with this contention.

The Applicant has previously submitted four planning applications for a Heritage Park (or variations on this theme) on this site to Colchester Borough Council. These were: 0/COL/01/0553 April 2001 (withdrawn in June 2001), Detailed submission September 2003 (not registered due to the lack of an Environmental Impact Assessment), F/COL/05/1558 September 2005 (withdrawn in March 2006 due to the lack of sufficient data) and 090231 February 2009 (refused by the Council in June 2011).

The cost to the Council Tax payer of these repeated Applications (all of which are variations on a very similar theme) including the independent Consultant reports associated with the 2009 application, is a matter of serious public concern.

The Applicant has a very unfortunate local planning history on the site of the greenhouses and has been forced by local pressure to apply for retrospective planning consent on five separate occasions for activities on the site. Details are as follows:

1. C/COL/01/1259 for the change of use of two former horticultural and industrial units for use by a distributor of fitness equipment and a manufacturer of quality kitchens and luxury bedroom furniture. This was granted on October 2001 for 18 months to April 30th 2003.
2. F/COL/03/0784 was granted in July 2003 as an extension to the above, three months after it had lapsed for a further period to the end of October 2004. This Application has itself now presumably lapsed and there is no public record of a further extension. One must therefore presume that the relevant activities ceased at the end of 2004. If not, which we know to be the case, then it would appear that the Applicant must be in breach again.
3. Application 071084 lodged in August 2007 for the retrospective change of use of an agricultural building to mixed-use agricultural/brewing and was subsequently granted for a defined period to October 31st 2010 with the very specific proviso that no retail sales should be made from the site. The reasons given for this were to **“protect the amenities of the surrounding area and to comply with the Council's retail policies”**. It is interesting to note that the Council said that **“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”**. (This ruling confirms the precedent for no retail activity on the site.)
4. Application 071086 lodged in August 2007 for the use of caravans on the site for permanent accommodation. This was withdrawn.

5. Application 081073 for the retention of caravans for temporary accommodation. This application was refused.

6. Application 121013 lodged in June 2012 (by Colchester Skip Hire) for the temporary storage of waste skips on open land adjacent to the greenhouses. The land is already being used for this storage and this is another example of a retrospective application. We understand that this Application has now been refused.

We note that the land on the western side of the Greenhouses is now described as Parkland. This was previously agricultural land and we are not aware of any planning consent to change the use of this land.

5. The Planning Context:

In order to review the planning context of the Application we have engaged the professional services of Pomery Planning Consultants to put forward their planning view on the merits of the Application. Their report is attached as Appendix 1. Their main conclusions are as follows:

“Summary

The Planning Application and accompanying Environmental Statement propose ambitious plans for what is said to be regional scale tourism development. The Application is a revision to a similar proposal, which was submitted and refused in 2009. The proposals are to be sited close to and within a nationally designated Area of Outstanding Natural Beauty (AONB). Given these facts, the proposals deserve close and careful scrutiny to ensure that they are capable of full compliance with all relevant planning policy. The planning policy framework is designed to evaluate and control any such proposals, to ensure that they do not result in any material harm to the countryside, to the living conditions of local residents and to the sensitivities of the AONB.

Development plan policy C2 of the East of England Plan provides a focussed set of criteria against which strategic tourism proposals should be determined. The proposals are considered to fail to meet the requirements of this key determining policy, due to their unsustainable location, poor accessibility and inappropriate scale and impact. The latest proposals do not overcome all of the objections that were levelled at the 2009 proposals despite targeted amendments to the scheme.

When considered against other development plan policies, the proposals are also considered to be in conflict with the requirements of the following policies:-

*East of England Plan Policies - **C2, T1**
Colchester Core Strategy Policies – **SD1, CE1, ENV1, ENV2, TA1,**
Development Policies DPD Policies – **DP9, DP10, DP14, DP17, DP22***

The requirements of these policies and the reasons why the application proposals fail to meet them are explored in the report.”

From the Pomery report it is very clear that the application does not meet the very specific requirements of the NPPF, the Colchester Core Strategy and Local Development Framework all of which are designed to control development in out-of-town locations and protect the integrity of the AONB and should therefore be refused on the grounds of lack of conformance with Planning Policy.

The Applicant relies heavily on the current applicability of the Policy C2 from the East of England Plan until this Plan is withdrawn by Act of Parliament as intended by the Secretary of State. The Pomery report crucially shows that the Application does not meet the requirements of all the seven criteria in this policy and should therefore be refused. Interestingly, this analysis shows that the land cannot be considered as brownfield land for the purposes of development. It is also significant that Pomery points out that there is possible building development within the AONB associated with the Chinese Garden and Tearoom. The exact nature of this development has not been specified by the Applicant. This is a matter of concern.

The Pomery report also makes comment in Para 4.9 concerning the potential consequences of economic failure of the Proposal on the countryside and advises the Council to seek professional advice to ensure that the business plan is sound and the proposed public transport improvements are workable and will deliver genuine modal shift.

The Pomery report makes the statement in para 2.1 that :

“the latest proposals do not overcome all of the objections that were leveled at the 2009 proposals despite targeted amendments to the scheme.”

This statement is significant; we believe that the proposals only deal with about five of the fifteen key reasons for rejection and our own analysis of this is shown in Appendix 2.

We contend that the Application must surely be refused on the grounds of lack of conformance with Planning Policy.

6. Need:

Para 4.23 of the Pomery report states:

“In relation to need, there is little evidence to suggest that the East of England is deficient in the type and nature of attraction proposed and no clear evidence to suggest that there is sufficient deficit in tourism or cultural facilities in the Colchester Area that would justify a proposal on this scale. The justification appears to be reliant on a belief that ‘if we build it they will come’ rather than any identifiable deficiency in this part of the region.”

To back up this statement, we have analyzed the Need for the proposed Horkesley Park by comparison with other established Visitor Attractions in East Anglia. Details of these, together with their attractor elements, are shown in Appendix 3 and graphically illustrated by the map at the front of this appendix.

What this shows is that there are many other established attractions in the region offering

most of the features of Horkesley Park. In several cases they offer much more, in the sense that they have established historic houses and mature gardens (where Horkesley Park cannot offer either of these), or established Art Galleries with international reputations. Many of them also focus heavily on education and anything offered by Horkesley Park would be additional to this already saturated market. Jimmy's farm in Ipswich is but one very local example of such an attraction offering extensive educational courses. Colchester has one major Regional (and probably National) attraction in Colchester Zoo and Horkesley Park could not even begin to compete with the wide range of features that this offers. There can be no 'need' for Horkesley Park in a Colchester, or East Anglia, context.

It is significant that most of the attractions offer extensive retail facilities (presumably in response to visitor demand and to make them economically viable) and it is hard to see how Horkesley Park could resist this if it were conceivably to become successful. We cannot therefore accept that retail should be treated as 'ancillary' as claimed in the Retail Statement paragraph 1.6 and elsewhere in the documentation. We comment on this further in the Viability Section 7 below.

It is interesting that many of the attractions offer picnic facilities. It is understood from the Public Consultation that Horkesley Park will not allow this.

It is also important to recognize that any possible need for the country park elements of Horkesley Park is negated by the ready access to the countryside in the Stour Valley through its extensive network of footpaths and many free areas of woodland and country parks in the area that are identified on the map.

In view of the above, it is our considered view there is no established need for Horkesley Park. It is no more than an attempt to exploit a redundant horticultural site for the commercial benefit of the Applicant to the potential detriment of the Dedham Vale Area of Outstanding Natural Beauty.

7. Tourism and Visitor Numbers:

The Applicant claims that the Centre will attract an aggregate of 316,250 visitors **in its first year** of operation. This figure is fundamental to the Applicant's justification for the whole proposal including, most significantly, projections on job creation numbers and the viability of their business plan which has not been published. If their business plan does not work, the projected new jobs cannot possibly arise in anything like the numbers projected. The basis for the figure projected by the Applicant is set out in the Sykes Leisure Projects report dated May 2012.

We strongly recommend that this report should be tested by independent experts, as it is so fundamental to the whole Horkesley Park application.

We are not aware of the threshold for visitor numbers that would justify the designation 'regional' being attributed to Horkesley Park. We do not believe that our estimate of about 120,000 visitors (see below) would put it into the regional category.

The logic behind the derivation of visitor numbers used by Sykes is very hard to believe:

In paragraph 3.2 of the Sykes report they quote Anian Leisure Consultants as saying that the geographical spheres of influence of modern, 'state of the art' heritage and natural attractions are less than two hours with the majority travelling less than one hour in each direction. Sykes then go on to say that 40% of visitors will travel between one and two hours. This seems to us to be a massive 'minority' (in Anian terms) and no justification is given for its assumption. It is crucial in deriving potential visitor numbers. On page 45 of the report the potential resident and visitor market in the one hour drive time is given as 5,667,160 with a further 24,034,706 coming from the one-two hour drive time giving a total of 29,701,866. They then use an overall penetration rate of 1.04% to derive the 316,250 visitors to Horkesley Park. If the 40% is wrong, then the overall penetration rate would have to be unrealistically high to achieve the visitor numbers projected.

It is almost as if they have thought of a Visitor Number requirement to give viability and then worked back from this to derive a penetration rate.

It is also significant that they have assumed a penetration rate that is second only to Colchester Zoo which is a very well established family attraction with a country-wide reputation. They give no credible basis for their assumption and it might be more appropriate to use the 0.37% given for Willows Farm (which they use as a comparator in terms of its attractions). This would give visitor numbers of 109,987 for Horkesley Park. 120,000 p.a. might therefore be a reasonable figure.

It is simply not credible to believe the visitor numbers given. There is no compelling attraction at Horkesley Park that would persuade more than a very few families of four to spend up to four hours (two hours each way) in a car for a day out and then spend close to £100.00 (as anticipated in the documentation) on entry fees and other expenditure. A day out is going to cost at least £200 per family after taking into account all other expenses of fuel and food.

Visitor Attraction Consultants in their report of April 2009 (which formed part of our submission of April 17th 2009) for the larger 2009 Horkesley Park proposal with more extensive attractions than the current one, concluded that '*between 100,000 and 150,000 visitors might be achieved after three years*'. The visitor attraction market has not changed significantly in the three years since their report and their conclusion supports our figure of 120,000 visitors.

The Review of Attractions in East Anglia in Appendix 3 shows that none of the other attractions in this review and for which visitor numbers are available, have anything close to the 316,000 visitors projected for Horkesley Park except Colchester Zoo, which is of National significance and Willows farm which has a vastly greater catchment area. Even Banham Zoo only has 205,000 visitors per annum.

The VisitEngland Top 20 East of England Attractions – paid, shown in Appendix 4 shows that Horkesley Park would have to get close to the numbers for the Imperial War Museum at Duxford if it is to reach the figures given by the Applicant. In view of the national reputation of Duxford as an air museum it is simply not believable that it would get even close to these numbers of visitors.

The review of viability show in Appendix 5 gives evidence to show that visitor numbers are unlikely to exceed 150,000.

With no compelling attraction at Horkesley Park, we therefore conclude that visitor numbers are unlikely to exceed 150,000 in the first year of operation and even this is an optimistic figure.

8. Viability:

It is a matter of regret that the Applicant has decided not to publish its assumptions regarding the financial viability of Horkesley Park. There is however certain information in the documentation that allows a business model to be created. Our own senior financial experts have done this and their report and conclusions are shown in Appendix 5. In preparing this report they have also carried out considerable research in comparing Horkesley Park with other similar attractions for which they provide details. Their report shows that :

Visitor numbers are considerably overstated.
Entry fees are overstated.
Spend per head is overstated
Margins on food, beverage and merchandise (based on 2009 margins), are overstated.

Any one of these factors (apart from margins on food and beverages) would create an overall loss for the project. If the combined effect of all these factors is taken into account, the project would make a:

Loss before interest and Tax of at least £2.5M.

If Interest on Capital Employed is taken into account the project would not be viable even on the assumptions made by the Applicant.

Furthermore, the analysis does not take into account the considerable additional expense that the Applicant will incur in operating the free/subsidised bus services required by the S106 Agreement. This would make the position even worse.

We also note that the Applicant has not apparently included any staff in the cafe or for security and maintenance. The cost of these may be incremental to the costs given which would make the viability even less probable. We also note that the Applicant focuses heavily on education as one of their main themes and we question whether they have taken into account the onerous and expensive demands of CRB checking of all staff that would be required.

It is significant that 48% of revenues are predicted by the Applicant to come from the sale of goods and services other than tickets – in other words, retail sales. Whilst there might be some sales from ‘rides’ of various descriptions it is unlikely that they will constitute anything but a small percentage of this total.

It is noted, and of concern, that the Council has agreed that the retail element has been accepted as ‘ancillary’. The Applicant has apparently reduced the dedicated retail space

by 86% compared with the 2009 application. This is largely an artificial reduction and there is nothing to stop the use of large areas of the proposed development, including the 2080 sq. M. display ring, for other retail activities such as Farmers Markets, specialist sales, etc. During the Consultation process we were verbally advised by the Applicant that over 120 small businesses had been approached. If they take up the option to sell their wares on the site, they will have to be accommodated somewhere – in other words, retail sales.

Business viability is a matter of legitimate public concern for the development of such a major venture as that proposed for Horkesley Park. Business failure would result in the creation of a venture in the countryside that could only be rescued by further retail expansion which the Council would find hard to resist.

At the very least, we strongly advise the Council to get their own independent financial analysis carried out and make any such analysis available in the public domain.

To quote the concluding sentence of the report:

“on the basis of the information that Buntings have provided, this business plan is not financially viable on any realistic basis. It does not make any sense from either a commercial or financial point of view. In short, it is a complete sham.”

9. Job Numbers:

The creation of genuine new jobs in the Colchester Borough must be attractive and is recognised as being an apparently strong point of the Applicant’s submission.

The Socio-economic impact assessment, Appendix 10.1 dated May 2012 of the Application, prepared by DTZ, sets out the job creation rationale.

In preparing their assessment DTZ rely entirely on the on-site job numbers given to them by the Applicant.

This has been given to them as 106.5 FTE jobs (paragraph 1.25 of the Appendix) and there is no serious analysis of the rationale for this figure and it could be said that the Applicant can claim what he likes to make the proposal look attractive at the Planning stage. It is apparently based on the experience of the Applicant in running similar businesses. We are not aware that they have any relevant experience of running major tourist centres of this scale. As stated in paragraph 7 above and by comparison with the 2009 model, we note that the Applicant has not included any staff for the cafe, maintenance or security. This supports our contention that there is limited serious rationale behind the jobs figure given. It is an exceptionally ambitious figure and should be tested for validity by the Council.

The only jobs that can really be ‘counted’ are the on-site jobs. We have given good reason in Section 7 above, that the business will not justify the creation of anywhere near 106.5 FTE jobs on site.

If the 106.5 FTE jobs predicted and the visitor numbers as shown in 5 above do not materialize, the number of second and third order jobs predicted by DTZ must be

substantially discounted.

There would be some benefit in the wider economy from the spend created by Horkesley Park in purchasing its supplies, its employees from their wage packets and visitors to the area in other outlets which might translate into additional jobs, but our view is that it would be impossible to identify any such new jobs as having been created solely as a result of Horkesley Park.

Any new second and third order jobs will only be 'real' if the spend that creates them is incremental and not substitutional. It is reasonable to assume that suppliers will have other outlets for their goods, and visitors to the Park will spend their discretionary leisure money anyway somewhere in the wider economy – whether it be local, regional or national and therefore it cannot be treated as incremental spend except at the very local level. This therefore confirms the argument that most of the second order jobs would be offset by losses elsewhere in the economy. Horkesley Park will not be creating new jobs in the wider economy; there is no new money being spent except at the very local level.

Many of the new jobs on site would be in the service of food and other retail activities. They would be low wage jobs with relatively low skill levels and would be attractive to transient and short term workers prepared to work at, or close to, the minimum wage. Many of these will also be seasonal due to the predicted peak numbers in July and August.

Our view is that the Colchester Borough Council should treat the Applicant's job creation claims with considerable caution. The only real new jobs to be considered are those on site and these are likely to be very considerably less than 100 in the first year and mainly in the unskilled category.

The potential for job creation in itself must not be a reason to override all other Planning considerations. The Applicant cannot be bound to create the promised jobs through an S106 Agreement.

10. Traffic Issues:

In our submission we have made it clear that we do not accept that the predicted visitor numbers are achievable. However, as the Application is predicated on the number of visitors the Applicant expects to generate, we will base our comments on the traffic issues on the figures provided by them. We emphasise that our comments here are equally applicable to the lower visitor numbers we expect to see in practice.

As stated in the Pomery report, planning policy provides that developments attracting large numbers of people should be accessible by all means of transport and the need to travel by car should be minimised. This principle is not met by the Application for the following reasons:

- Existing public transport to and from the area (by bus) is inadequate, and alternative provisions within the Application do not address the inescapable fact that the majority of visitors will access the site by car.
- The additional bus services provided for in the Application may not prove to be robust.

- As over 90% of visitors will predominantly access this site and others in the Dedham Vale by car, it is unlikely that most will use bus services between other points of interest in the area, preferring to use their own means of transport.
- 316,000 additional visitors to the site will give rise to more than a modest additional daily vehicle movement. These will average 1000 per day and the impact on minor roads will be significant.
- The new A12 junction 28 does not prevent access to the site from Ipswich (from the North and East via the A12/B1068); from Cambridge, Braintree and Halstead (from the North and West via Little Horkesley) and from the South (from the A12, Argents Lane, West Bergholt and London Road). It is already the case that satellite navigation systems will provide a number of route options for accessing the site of the proposed development utilising unsuitable country roads.
- Rat-runs from the new Junction 28 on the A12 through Boxted to the A134 are already a cause for concern for Boxted residents.
- All of these secondary routes are minor and in some case single track roads where the capacity is inadequate to absorb additional user numbers.
- Planning Policy does not envisage all roads being filled to their “capacity” or near capacity – the test is merely one of “more than a modest increase”.

Protected Lanes:

DP21 provides that Protected Lanes “will be protected from development that would adversely affect their physical appearance or would give rise to a material increase in the amount of traffic using them”. Fishponds Hill is a Protected Lane. It runs along the south western boundary of the Horkesley Park site. From Fishponds Hill there is direct access via an existing footpath across the site. Due to its proximity and location it will inevitably see a material increase in the amount of traffic using it. We do not accept the very low estimates given. There can be no provisions within the application that prevent a significant number of the 316,000 visitors accessing the site by car via this Protected Lane or leaving the site via this route. It will be one of the prime rat runs to and from the site. Furthermore we are concerned about the potential danger to cyclists from traffic using this lane. It is already a very dangerous lane and the additional cyclists being encouraged by the Applicant will make this danger even more concerning.

The prime aim of the Council under policy guidelines is to preserve the protected rural nature of this area. The increased traffic from 316,000 visitors to a site which is simply in the wrong location for a development of this nature, is fundamentally at odds with this overriding principle.

11. Listed Buildings:

The Pomery report (4.35) points out the potential impact on the Grade I listed Church of All Saints of the proposed development. It says that the harm previously identified will continue to be detrimental to its setting. This needs to be properly tested by English Heritage.

The privacy of the Grade II* Old Joscelyns will be seriously compromised by the fact that the border of the Country Park will be only about 140 meters from its boundary. This will not be tolerable, particularly on busy summer weekends and the impact of the Development will be significantly adverse.

12. Noise and Light Pollution:

Noise:

The Application takes no account of noise generated by people. This is not realistic. The Valley to the north of the proposed development acts as a sound chamber – particularly when weather conditions are still. Noise of people can be clearly heard across the valley. In particular there is bound to be considerable noise from the children’s play area and the Country Park. Equally the tranquility of the Church and Churchyard will be compromised.

The Applicant gives details of expected visitors on a month-by-month basis and it is apparent that there could be over 3000 people per day on peak summer weekends and the inevitable noise from such a large number would be very intrusive.

These impacts have not been assessed and will be considerably adverse and must be taken into account.

Light:

We note the comments in the documentation regarding lighting where it says that:

“The Horkesley Park area is currently a dark landscape despite the baseline illumination of the glasshouses on the Nursery Site, due to screening by topographical and other landscape features. There is security lighting in the Nursery Site which causes a moderate level of obtrusive glare to some key receptors.”

Nothing must be allowed that will impinge on this currently dark landscape.

We believe that there is an intention to use the development for evening functions although it is very vague in terms of the number and nature of such events. Any use of the site for evening functions will introduce significant noise and light pollution in circumstances that do not now exist at all, based on current use of the site.

We note that the site will be open 364 days per year and until half an hour before dusk (as late as 9.51 pm on midsummer’s day) or 6.00pm whichever is the later. Light and noise pollution could well be a feature of Horkesley Park late into the evening, particularly in summer months.

13. Carbon Emissions:

The Applicant has made no apparent attempt to assess the carbon footprint of the development.

We assess that the likely generation of **additional** CO₂ by people travelling to and from the Park would be at least **3000 tonnes** per annum. This is an adverse impact of the proposed development which must be taken into account.

14. The Agricultural Development and Advisory Services (ADAS) Report:

The Application has, as its basis, that the glasshouses are effectively redundant. SVAG previously commissioned a report from ADAS which showed that a reasonable return can be made from the site from horticultural activity, although this may not meet the requirements of the entire applicant partnership and all its family members who presumably all wish – probably unrealistically - to derive a livelihood from it. It is contended the deterioration of the site through a lack of investment and commercial drive does not give rise to any essential need for “agricultural diversification” and that the site can be maintained for its originally stipulated or similar use.

The site should not therefore be regarded as agriculturally redundant and conversion of a grade 2 field into an overflow car park should not be permitted within guidelines.

15. Public Comment:

We are aware that the Application has generated considerable public interest and that the Colchester Borough Council has received many comments from the public both supporting and objecting the proposals. We are however concerned that the Applicant has circulated literature (of which we have copies) to the general public stating that opposition groups have been spreading misinformation and scaremongering. We presume that this is primarily aimed at SVAG and these allegations have no basis in fact. It is regrettable that the Applicant has attempted to stifle public debate by failing to publish certain critical data, including its Business Plan.

We would like the Council's assurance that the Applicant's petition concerning the previous Application 090215 (which has been included in the documentation relating to 120965) will be set to one side. This petition has no relevance to the new proposal which is different in content. Our view is that any judgment relating to public support for or against the Application should only be based on letters and e-mails that have been sent to the Council in respect of the current Application.

At the date of this letter, there have been 547 letters of objection and 297 letters of support. These include letters of objection from the Dedham Vale Society, the Colne Stour Countryside Association and the Nayland with Wissington Conservation Society, They are writing on behalf of their **aggregate membership of 1938 people**.

In addition, letters of objection have been sent by the Suffolk Preservation Society, CPRE Essex, the Beehive Residents Association the parish councils of Little Horkesley, Leavenheath, Stoke by Nayland and Stratford St Mary. Nayland Parish Council voted unanimously to object and will be writing to that effect.

16. Conclusion:

For all of the above reasons we are convinced that the Application is seriously deficient and that the application for Planning Consent must be refused.

Yours sincerely

W L Pavry: Chairman, Stour Valley Action Group

Appendix 1.



**Stour Valley Visitor Centre
Horkesley Park**

**Planning Policy Representations on behalf of
The Stour Valley Action Group (SVAG)**

Introduction

- 1.0 The following is an assessment of the planning policy implications associated with the proposals at Horkesley Park, submitted by Bunting and Sons (the applicants) for development described in their planning application number 120965 as :-

“Change of use and development of land to form 'The Stour Valley Visitor Centre at Horkesley Park' comprising a country park art and craft studios ('The Chantry') public gardens a central building complex to provide an indoor display ring, 'Suffolk punch’”

- 1.1 The assessment has been prepared by Chartered Town Planners Pomery Planning Consultants on behalf of the Stour Valley Action Group (SVAG). It is based on a review of the application submission, a review of the relevant development plan policies and knowledge of the site and the general area.

Summary

- 2.0 The Planning Application and accompanying Environmental Statement propose ambitious plans for what is said to be regional scale tourism development. The application is a revision to a similar proposal, submitted and refused in 2009. The proposals are to be sited close to and within a nationally designated Area of Outstanding Natural Beauty (AONB). Given these facts, the proposals deserve close and careful scrutiny to ensure that they are capable of full compliance with all relevant planning policy. The planning policy framework is designed to evaluate and control any such proposals, to ensure that they do not result in any

material harm to the countryside, to the living conditions of local residents and to the sensitivities of the AONB.

2.1 Development plan policy C2 of the East of England Plan provides a focussed set of criteria against which strategic tourism proposals should be determined. The proposals are considered to fail to meet the requirements of this key determining policy due to their unsustainable location, poor accessibility and inappropriate scale and impact. The latest proposals do not overcome all of the objections that were levelled at the 2009 proposals despite targeted amendments to the scheme.

2.2 When considered against other development plan policies, the proposals are also considered to be in conflict with the requirements of the following policies:-

East of England Plan, Policies - C2, T1,

Colchester Core Strategy Policies - SD1, CE1, ENV1, ENV2, TA1,

Development Policies DPD Policies - DP9, DP10, DP14, DP17, DP22

2.3 The requirements of these policies and the reasons why the application proposals fail to meet them are explored in the following paragraphs.

The Planning Policy Framework

3.0 Planning decisions in England are to be determined in accordance with the development plan, unless material considerations indicate otherwise. This doctrine is given statutory force by s38(6) of The Planning and Compulsory Purchase Act 2004.

3.1 The National Planning Policy Framework (NPPF) which came into force in March 2012 has not changed the statutory status of the development plan as the starting point for decision making. The NPPF endorses the plan-led approach, advocating that proposed developments that accord with an up-to-date development plan should be approved. Proposed developments that conflict, should be refused, unless there are material considerations that indicate otherwise. The NPPF is not part of the development plan, but its content is a material consideration in the determination of all planning applications. Therefore, by law, planning proposals must comply with the development plan if they are to be approved. As this is the

case, it is highly desirable that local planning authorities have an up-to-date development plan in place.

The Development Plan

- 4.0 Colchester Borough Council has made considerable progress in the preparation of its Local Development Framework (LDF) and is one of few local planning authorities to have adopted a complete suite of Local Development Plan Documents. The development plan in Colchester and thus in relation to the determination of this proposal, consists of the following adopted plans:-

The East of England Plan (RSS14)

Adopted May 2008

The Colchester Core Strategy

Adopted December 2008

The Colchester Site Allocations

DPD, Adopted October 2010

The Colchester Development Policies

DPD Adopted October 2010.

4.1 Regional Planning Policy

Regional planning policy is found in the adopted East of England Plan (RSS14). The RSS provides a consistent regional framework to inform the preparation of Local Development Documents. They must be in general conformity with the RSS, local transport plans and regional and sub-regional strategies and programmes with a bearing on land use activities. It also sets out policy and proposals for regional scale development. The Government has made it clear that they intend to abolish regional strategies outside of London, however the courts and the NPPF advise that regional strategies remain part of the development plan until they are abolished by Order using powers taken in the Localism Act 2012. For the

time being therefore the RSS remains part of the development plan. The weight to be given to RSS policy when decision making is a matter for the decision maker, who shall also have regard to the fact that it is Government's clear policy intention to revoke regional planning policy in due course.

Relevant Development Plan Policies

- 4.2 The following is a review of the most relevant planning policies which need to be met in order for the proposals to be in accordance with the development plan. It is not an exhaustive list of all relevant policies, but it does include those policies which are of particular importance to the determination of this particular proposal.

The East of England Plan (EEP)

Policy C2 Provision and Location of Strategic Cultural Facilities

- 4.3 This policy is identified by the applicants as one which is of most relevance to these proposals. The applicants also acknowledge that in order to comply with the policy, proposals must comply with each of its seven criteria. Whilst the policy sets out strategic development control criteria for tourism proposals, the opportunity has existed for some time for these proposals to be developed alongside the preparation of the Colchester LDF.
- 4.4 It is understood that the Horkesley Park proposals were conceived as early as 2001, when an Outline Planning Application O/COL/0553 was submitted to the Council for a John Constable Countryside and Heritage Centre at Horkesley Park. Given the early conception of the proposals, the opportunity was available to promote the site during the evolution of the Colchester LDF. Planning proposals of this nature and scale are unlikely to comply with local planning policy, unless they form part of its development. Proposals on this scale are perhaps best developed during plan making and it seems that this opportunity has either been missed or attempted and failed. A good example of how large scale proposals can

be developed in this way would be the development of the Colchester United Community Stadium. The stadium evolved as part of the preparation of the development plan and became established, alongside infrastructure and public transport improvements that could support it.

4.5 In relation to the criteria of Policy C2, the applicants provide an assessment of the proposal's performance in relation to the seven criteria in a separate Planning Policy Assessment (VOL3). The applicants state that the proposals comply with the requirements of Policy C2 and seek to demonstrate this in their technical appendix.

4.6 **Criterion (i)** states that proposals must - *“enhance existing facilities of regional or national significance or, elsewhere, reflect a sequential approach - with priority to locations in town centres before off-centre or out-of-town locations, and to the use of brownfield land in preference to greenfield sites. Exceptionally the specific attributes of a rural site may make it appropriate for a regionally strategic proposal”*

4.7 As the proposals are not an enhancement of an existing site, nor are they possible in the town centre, the applicants rely upon a sequential test to demonstrate that the application site is the most sequentially preferred location. The sequential test undertaken in this case is said to follow the guidance in the NPPF. However, the NPPF at paragraph 24, amongst other things advises that applicants and the planning authority should demonstrate flexibility on issues such as format and scale. There is no evidence set out in the sequential test undertaken in this case that demonstrates flexibility in these areas. The site search criteria included requirements such as a minimum of 25 hectares of land, brownfield land of 4 hectares and a close proximity to the Dedham Vale AONB. To meet such requirements would of course be very challenging, as they essentially describe the application site. The purpose of the test should be to focus on finding the most suitable, sustainable location to locate a regional visitor attraction. By conducting the sequential test in the way they have, the applicants have not demonstrated flexibility in terms of scale and format. Consequently, the sites rejected in the test were found to be too small, not close to the Dedham Vale AONB, not brownfield and having poor accessibility. Not surprisingly, the application site meets most of these requirements, in that it is of the right size, it is close to the

AONB and it is considered by the applicants to constitute brownfield development. However, the brownfield element claimed by the applicants is incorrect for reasons given below, and, like many of the out of town locations rejected in the sequential test, the application site is not accessible. The applicants have not adequately proven therefore that the application site is the most sequentially preferred location.

4.8 If the application site cannot be shown to be the most sequentially preferred location, then the applicants would have to rely upon the final locational preference set out in policy C2. That preference would be a rural exception site, which is described in the last sentence of criterion (i). Qualifying sites are those rural sites which have specific attributes that make them a potential location for a regionally strategic proposal. Such attributes are described in the supporting text to the policy as former mineral workings or for facilities attracting large numbers of visitors, interchange facilities outside of large settlements with good or potentially good public transport. The intention being that exceptionally, a site in the rural area which displays such attributes may be considered for strategic visitor development. It is important therefore that such a site displays suitable attributes, such as good or potentially good public transport provision for it to be regarded as an appropriate exception site. This application site does not display any particular attributes and accordingly does not satisfy this criterion.

4.9 A fundamental requirement of Policy C2 is that the proposal must be of regional significance. The applicants' Tourism Evaluation Report, May 2012 (VOL 2) provides predicted visitor numbers, as well as visitor numbers of other established attractions, which are provided for comparison. Whilst the visitor numbers predicted are perhaps comparable with similar attractions, the study quite sensibly advises that there are a number of factors to be considered which may affect actual visitor numbers and thus the ultimate viability of the proposal. Some of those factors, such as the quality of operational management, visitors' perception and the quality of the product offer are yet to be established and thus the predicted visitor numbers must be given proportionate weight when assessing the scheme's viability. To achieve regional status, attractions are judged on their ability to generate visitors. It therefore remains to be seen whether the predicted

numbers for this proposal will materialise. It is usually the case that such attractions obtain regional status through evolution over time. This proposal anticipates high visitor numbers in its early years. Therefore the risks to the countryside if predictions are even slightly out, are high. This is especially true if the project proves not to be viable in the event of anticipated visitor numbers not being achieved. Whilst economic viability is perhaps a matter for the applicants, the consequences of a reduced return on investment, would be catastrophic for the countryside. Were this to happen, the Council would come under pressure to allow further diversification of uses, perhaps more harmful development and a reduction in the promised sustainable transport measures, in order to rescue the project. The business plan prepared for the development is not in the public domain. The impacts of the proposals on the countryside are clearly significant and the economic benefits, which are said to justify the proposals, will not materialise if viability is not guaranteed. In the context of policy C2, the site must be considered as an exception site. Therefore its success in viability terms and its ability to be served predominantly by public transport must be proven, before permission can be granted. The Council are advised to seek professional advice to ensure that the business plan is sound and the proposed public transport improvements are workable and will deliver genuine modal shift in the long term. It should also be noted that the Tourism Evaluation Report includes a section which highlights the limitations of the report's findings. These limitations must be weighed in the balance as a key element of the decision making process.

- 4.10 Further in relation to criterion (i), the applicants highlight the fact that the proposals make use of "Brownfield Land". In doing so they draw attention to the definition of "Brownfield Land" as set out in the glossary provided in the Colchester Development Policies DPD. This definition can be given no weight in the application of EEP Policy. The EEP does not contain a glossary, but it was prepared against the backdrop of PPS3, which contained the Government's definition of brownfield or previously developed land. It is the PPS3 definition, which has now been superseded by the definition provided in the glossary to the NPPF, which is relevant to this proposal. The NPPF, like PPS3 before it, specifically excludes "*land that is or has been occupied by agriculture or forestry buildings...*" as being considered brownfield. Therefore, in the determination of this proposal the most appropriate definition of brownfield land will be that of the NPPF. Consequently, the land on which the development is proposed can not be

afforded the status of previously developed or brownfield land due to its agricultural past.

- 4.11 Therefore, in relation to criterion (i), the site must be seen as a rural exception site where it must demonstrate high levels of public transport accessibility and be of regional scale. The latter of these requirements remain to be seen and the Council must therefore satisfy itself, if it is to approve the proposals that the scheme is viable and that genuine modal shift will be delivered. Furthermore, the Council can not make any allowances for the proposal on the basis that it comprises development of previously developed land.
- 4.12 **Criterion (ii)** requires that proposals do not adversely affect areas designated for their ecological, landscape or historic value. Whilst the buildings proposed in the scheme fall outside of the Dedham Vale Area of Outstanding Natural Beauty (AONB), the vast majority of the proposals are within the AONB. The development that is proposed in the AONB amounts to the change of use of the land from agriculture to country park. A timely criteria for assessing impact on designated sites such as the AONB, is provided in Paragraph 116 the NPPF, which states:-

“Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest. Consideration of such applications should include an assessment of:

- *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;*
- *The cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and*
- *Any detrimental effect on the environment, the landscape and recreational opportunities and the extent of which that could be moderated”.*

- 4.13 The application submission provides considerable information as to how the site

can be developed without adversely affecting the AONB. However, the applicants do not provide a specific assessment of the application proposals against the NPPF criteria above. Such an omission is considered to be significant as the NPPF criteria ask searching questions which are designed to go to the heart of a proposal. The criteria challenge the need for the proposal and the likely impact of a refusal on the local economy. They consider the cost implications of alternative locations and the cost of meeting any demonstrated need in some other way. As far as can be determined from the submissions, these questions have not been specifically answered. Any approval for this development would, it is considered, be vulnerable to challenge in the courts if it were issued without a full and frank assessment of the specific NPPF criteria at paragraph 116. In addition to the change of use proposed for the area of land within the AONB, the application proposes a Chinese garden and tea pavilion within the AONB. The submission includes no details of the extent of the gardens, their visual impact on the landscape character of the AONB or the scale, design and siting of the pavilion. These absent elements of the proposal must be submitted for consideration in order to ensure the special character of the AONB.

4.14 **Criterion (iii)** requires development to meet the sustainable objectives of the EEP. The submission details the proposal's sustainability credentials, which are wide ranging. It is accepted that the development can be constructed using sustainable materials and operated using low energy systems and be fuelled in part by renewable sources. However, it is interesting to note that limited data exists in the application submission as to the proportion of on-site renewables that might be possible. This is surprising when a key component of the proposals is the site's proposed Renewable Energy Centre. What is more difficult to predict with certainty, is the likelihood of a genuine modal shift away from the use of the private car. Due to its unsustainable location in the countryside these proposals will generate significant additional vehicle movements. The Council must be fully satisfied that the proposals will meet the sustainable objectives of the EEP.

4.15 **Criteria (iv) & (v)** deal with modal shift and public transport. The application deals with both matters in its Transport Assessment (TA) and Travel Plan (TP). Whilst it is possible to put measures in place to affect a modal shift, the measures proposed to provide additional bus services are considered to appeal to a limited proportion of expected visitors. These measures are only proposed to be funded

for the first 5 years of the life of the proposal and therefore their lasting impact is uncertain and perhaps not sustainable in the long term. It is likely that due to the site's location, the majority of visitors will prefer to use their car to access the site. Public transport in the area is presently poor, with an hourly service passing close to the site. The TA advises that discussions will take place with bus operators to explore the potential for exploring enhanced services. It is considered that these discussions should be fully developed at this stage of the proposal to ensure a commitment from existing operators. It is considered that if the Park intends to run a fully funded free bus service, it is most unlikely that a commercial bus operator will wish to increase its paying service to cater for visitors to the site.

4.16 The suggested branded 'Horkesley Park' bus service is proposed to be subject to demand, but likely to be operating every 15 minutes between Colchester and the Park. It is difficult to see how such a service could be efficiently operated. It is likely that on a 15 minute service, the bus would on many journeys, carry only a limited number of passengers. Demand for the bus at any given time would be difficult to predict during the full opening times of the Park. An empty bus or one which is under capacity running regularly from A to B would be inefficient and unsustainable in every sense. Similar arrangements operate to deliver visitors to the Colchester Community Stadium; however the significant difference here is that the service operates on match days where there is a critical period before and after matches when demand is known. Another factor, which makes the service to the stadium work, is the limited and deliberately expensive parking at the stadium, which is designed to incentivise visitors to use public transport. Match tickets also include free bus travel, which makes taking the bus more attractive to visitors.

4.17 The application site is not well served by public transport and is in a location where the majority of visitors are likely to prefer to use their car. Whilst there are measures proposed to bring about a modal shift, these measures do not include sufficient incentive that will lead to the majority of visitors switching to sustainable transport modes. As such, the proposals are do not satisfy criterion (iv) and (v) of Policy C2. The application site must, due to its location, be considered a rural exception site. If the proposals are to be allowed here, then they must demonstrate that visitors will predominately opt to travel by public

transport. This element of the proposal is a key component in demonstrating that the proposals are truly sustainable. The Council must be convinced that a significant number of visitors will choose to make use of the improved public transport proposed, before the site can be genuinely considered as a rural exception site.

4.18 **Criterion (vi)** relates to minimising the use of energy and natural resources. The proposals set out their intentions in this respect, but do not specifically demonstrate the levels of energy efficiency achievable or the extent of the on-site renewable energy that the scheme can generate. This is surprising when the proposals include a Renewable Energy Centre, which will demonstrate the efficiency of the site in an attempt to educate others. Whilst there is a commitment from the applicants to minimise energy use, the extent to which this can be achieved in practice is not demonstrated and thus, the requirements of criterion (vi) have not been satisfied.

4.19 **Criterion (vii)** requires proposals to be of an appropriate scale and impact. The applicants refer to the submitted Justification Statement (JS) to explain the proposals in this regard. The JS does not specifically deal with scale and impact in the context of the policy, but it does seek to demonstrate the need for the proposals, which it attempts to do in a variety of ways. Some of the areas of need identified, such as greater countryside education and job creation could perhaps be justified by the development of the site as proposed, however these do not in themselves justify the scale and impact of the proposals.

4.20 It is not evident in relation to scale, why the proposals must be of the magnitude proposed. The development involved appears to be predicated on the need to diversify away from the historic agricultural activities of the site. The physical scale and impact of the existing buildings are used to give licence to the scale of new buildings proposed. It is asserted by the applicants that the reduction in built form on the site overall, is a benefit to the areas landscape quality. However, to be accepted as beneficial, any advantage must be balanced against the other, more harmful elements of the proposals, such as increased traffic and activity in the countryside and AONB. The existing buildings are an expected feature in the countryside, whereas the proposals, particularly on the scale proposed are not. The scale of development proposed would be significantly greater than that which

would normally be permitted in the countryside, under national, regional or local planning policy. The loss of larger buildings, which are agricultural in nature, would not justify development on the scale proposed. Any limited advantage gained by the reduction of the existing buildings is outweighed by the final scale of the proposals and its associated areas of car parking, additional traffic and activity they facilitate. Whilst efforts have been made to minimise the impact of the development, it will be an alien feature in the landscape and can only be justified if it can deliver genuine benefits to the wider community. These benefits have not been demonstrated.

- 4.21 The development proposed can not be justified on the basis that the proposals comprise 'Brownfield' development. They do not, due to their historic use in agriculture.
- 4.22 The site's location must be considered as a rural exception site, under the criteria of policy C2 and therefore it must demonstrate that there are exceptional circumstances, associated with the proposals that would justify approval in this location. The proposals do not set out exceptional circumstances, which justify development of the site in the scale and manner proposed. It can be said that in fact, the site has poor access to public transport, it is not at a major interchange and improvements to public transport will be expensive, not guaranteed in the long term and are unlikely to lead to a sustained and meaningful modal shift.
- 4.23 In relation to need, there is little evidence to suggest that the East of England is deficient in the type and nature of attraction proposed and no clear evidence to suggest that there is a significant deficit in tourism or cultural facilities in the Colchester area that would justify a proposal on this scale. The justification appears to be reliant on a belief that "*if we build it they will come*", rather than an identifiable deficiency in this part of the region. Whilst it may be desirable to provide the wider community with additional attractions, they need to be fully justified and proven to be viable if they are to be sited in rural locations with limited public transport opportunities.
- 4.24 In relation to their impact, the limited amount of development proposed in the AONB is acknowledged. However, the impact on designations such as the AONB should now be justified in relation to the tests set out in paragraph 116 of the

NPPF. These tests are not specifically addressed within the planning application submission.

4.25 Policy C2 of the EEP is recognised by all in this process to provide the key development control tests that need to be met by this proposal. From the information submitted, it has not been demonstrated that the proposals have fully complied with the policy and therefore planning permission should not be granted.

4.26 **Policy E6 Tourism**

Whilst policy E6 focuses on tourism, which is of course relevant to this proposal, its main objective relates to plan making and is therefore not discussed.

4.27 **Policy T1 Regional Transport Strategy Objectives and Outcomes**

This policy generally supports proposals that lead to a modal shift away from the use of the private car. Whilst it is the applicants' case that the application site is the product of a sequential test, its location is one which is poorly served by public transport. The development will inevitably increase car journeys overall, a fact that is not outweighed by any of the potential benefits of the proposal. The site is a rural exception site, which if it is to be allowed, must provide measures that will ensure that it is accessible by public transport and that the public transport becomes the method of choice of many who visit the site. The Council must be convinced that this will be the case if it is to consider allowing the proposal.

The Colchester Core Strategy

4.28 **Policy SD1 Sustainable Development Locations**

The policy promotes sustainable development and job creation giving priority to previously developed land. The applicants submit that their proposals are sustainably located and will create jobs utilising previously developed land. The

application site is not easily accessible by public transport; the redevelopment of the glasshouses is not development on previously developed land as defined in the glossary of the NPPF. Therefore its status as a sustainable location has not been proven.

4.29 Policy CE1 Centres and Employment Classification and Hierarchy

The thrust of this policy is to encourage economic development requiring larger scale development to be focused on Town Centre, Urban Gateways and Strategic Employment Sites. It states that employment development that conflicts with the Centres and Employment Classification and Hierarchy will not normally be supported. The applicants contend that Policy CE1 and the LDF generally can only deal with local needs and rural economies and that EEP Policy C2 provides the development criteria for regional scale development. If that is so, the Council must be convinced that the proposals are able to satisfy the requirements of policy C2 in full. It is contended that the proposals do not comply with the requirements of Policy C2. The requirements of policy CE1, state that development in countryside locations are to be small scale and result in low traffic needs and low impact. As such these proposals conflict with these requirements.

Policy ENV1 Environment

- 4.30 This policy seeks to protect the countryside and coastline and prohibit development that will lead to harm to areas given special protection, the historic environment and biodiversity. Development that needs to be located in such areas must comply with a comprehensive set of criteria. It has not been demonstrated that the proposals must be carried out in this rural location which is both close to and within the Dedham Vale Area of Outstanding Natural Beauty.

ENV 2 Rural Communities

- 4.31 Amongst other requirements, policy ENV 2 specifically states that for proposals located outside village boundaries, the Council will favourably consider small-scale rural business, leisure and tourism schemes that are appropriate to local employment needs and minimise negative environmental impacts. Proposals must

also be in harmony with the local character and surrounding natural environment. The scale and nature of the proposal fail to meet these criteria.

Colchester Development Policies DPD

4.32 Policy DP 9 Employment Uses in the Countryside

This policy deals with employment development in the countryside. The policy supports small scale development that does not harm the rural character of an area, either by the nature and level of activity (including additional traffic on rural roads). The applicants accept that the proposals are not small scale and that they will lead to additional traffic on rural roads. In mitigation to these conflicts with the policy, the applicants rely upon a reduction in built form on the site and on their contention that there is capacity in the highway network to take the additional traffic. The fact that there may be capacity in the highway is a highway safety and congestion consideration. Policy DP9 requires applicants to consider the harm to rural character that would result from additional traffic. The proposals would, by increasing traffic movements on rural roads, lead to a material change in the character of this part of the countryside, which would in turn result in harm to the countryside generally and to the AONB in particular.

- 4.33 The applicants rely upon the replacement of larger existing buildings on the site as mitigation for the scale of the development proposed. The applicants refer to this as being development of previously developed land. The buildings concerned are agricultural buildings, which are specially excluded as being considered previously developed land for planning purposes, as defined in the NPPF. The glasshouses are an expected feature in the countryside; it is inappropriate to rely upon their scale to justify large scale replacement buildings.

DP10 Tourism, Leisure and Culture

- 4.34 The thrust of this policy is the promotion of new and extended visitor attractions. Where public transport accessibility is poor the policy requires proposals to be

small scale. In the case of this proposal, public transport accessibility is presently poor, yet the proposals are very large scale. The Council must therefore be satisfied that the improvements to the accessibility of the site can be delivered and sustained in the long term if the proposals can be accepted under this policy.

Policy DP14 Historic Environment Assets

- 4.35 The application site includes The Church of All Saints, Great Horkeley and its setting; the church is a Grade I Listed Building. Whilst the proposals do not propose development of the listed church, development is proposed nearby which could impact on its setting. English Heritage previously took the view that the proposals that formed the 2009 application, would result in substantial and incongruous development that greatly altered the general setting of this Grade I heritage asset. Whilst the proposals now submitted have been reduced in scale, the buildings which are sited closest to the Church remain as previously proposed, with the exception of the deletion of some barns to the west. Overall, it can be said that the look and feel of the proposals, is very similar to the previous scheme and as such, the harm previously identified will continue to be detrimental to the setting of a Grade I Listed Building. English Heritage will ultimately need to consider the latest proposals and the planning authority is reminded that they have a statutory duty to consult English Heritage as the proposals involve a grade 1 listed building.

Policy DP17 Transport Infrastructure Proposals

- 4.36 The policy requires all developments to seek to enhance accessibility for sustainable modes of transport. The proposals include private bus services at 15 minute intervals between the centre of Colchester and the Park. These services are to be funded by the development for the first 5 years, via a Planning Obligation. Whilst the provision of this service is necessary, given the poor existing public transport opportunities, it remains to be seen if it can truly bring about a modal shift that will be attractive to the majority of visitors to the site. The most likely users of the service are town centre residents and those who arrive into Colchester by train. Those visitors who live in suburban Colchester locations, neighbouring villages and towns would need to travel to Colchester first, in order to take advantage of the direct public transport to the site. It is

most likely, that those visitors who live in surrounding settlements will choose to drive directly to the site and make use of its parking provision. Whilst the proposed bus service is a practical attempt to force a modal shift, in practice it is likely to have limited impact on travel behaviour. The applicants' Travel Plan is silent on how visitors would be incentivised to take the bus in preference to their car. Without incentive the modal shift to the bus or other sustainable travel modes is likely to only have limited success. The Council need to be fully satisfied that the public transport measures proposed will overcome the unsustainable location of the site.

Policy DP22 Dedham Vale Area of Outstanding Natural Beauty

- 4.37 The aims of the policy are to afford protection to the AONB from development within the area of designation or nearby, which does not make a positive contribution to its special landscape character and qualities. Whilst the buildings proposed are outside of the AONB designation, they are nearby. The applicants are of the view that the replacement of the glasshouses on the site benefits the setting of the AONB. However, the glasshouses are an integral part of the rural landscape and buildings of this nature are common in the English countryside and are to some extent expected in the rural scene. However, the scale of the application buildings and the development associated with them would on the scale proposed, be alien features in the landscape generally, and in the AONB in particular. Their presence in this location and their proposed function and scale are not critical to providing greater access to the AONB. The applicants advise that just one third of visitors are expected to access the Country Park. Entrance to this element of the attraction will incur the full entrance fee to the Park and therefore visitors, who wish to specifically enjoy this part of the AONB, can only do so, on payment of a significant fee. This facet of the proposals can not be said to have a positive impact on the enjoyment of the AONB, nor does it promote or secure improved public access to the AONB, in fact the opposite is true.
- 4.38 As with EEP policy C2, policy DP22 provides a set of tests, which need to be met by proposals either within or near to an AONB. These tests are supplemented by further requirements set of in paragraph 116 of the NPPF. This proposal involves significant development close to the AONB and a change of use of a substantial area of land within the AONB. It is therefore entirely appropriate that the

applicants not only provide evidence which addresses the tests set out in regional and local planning policy, but also that provided in the NPPF. The application submission does not presently include responses to the specific tests set out in the NPPF in relation to development proposed in Areas of Outstanding Natural Beauty.

Conclusion

- 5.0 These proposals involve significant development in the countryside close to and within an Area of Outstanding Natural Beauty. Proposals of this nature and scale are rare and when proposed to be located in the countryside, require comprehensive justification and full compliance with planning policy. New visitor attractions in the region were anticipated when the East of England Plan was prepared. Policy C2 of the plan provides particular criteria against which proposals for regional scale visitor attractions are to be determined. Site selection is a key element of this policy. It requires a sequential approach to ensure development sites are selected in the most sustainable locations. Exceptionally, rural sites, which contain attributes that may make a particular site appropriate, can also be considered for development. Other development plan policy taken from adopted plans at a regional and local level set out further requirements, against which proposals of this nature must comply.
- 6.0 For the reasons set out above, it is considered that the proposals for Horkeley Park as submitted, do not meet all the of requirements of relevant planning policy, accordingly planning permission should be refused.

Robert Pomery BA (Hons), Dip TP, MRTPI

17th July 2012

Appendix 2: Planning Decision Summary 2011

The Notice of Planning Decision for Application 090231 was published by the CBC in July 2011 and dated 3rd June 2011. It needs to be read in full but in summary the reasons for refusal were as follows: (*our comments on conformance of the new proposal are shown in italics in so far as we have information*).

1. Relevant Policies:

The Notice lists all the relevant National, Regional, Core strategy and Development Plan policies that are related to the Application. It states that the basic principles of these policies is an aim to conserve and enhance the countryside and protect and enhance the built environment through recognising the importance of achieving sustainable development in terms of location and design and its impact on the surrounding area. The Dedham Vale AONB Management Plan Tourism Good Practice Guide and Landscape Character Assessment are also material considerations.

The Colchester Core Strategy, Colchester LDF and the NPPF are likely to be the dominant considerations in the new application. Buntings' consultants believe that regional policies will continue to apply. We do not believe the Application meets these criteria and they should be given little weight.

2. Site not identified for development:

The HP development is not on a site identified for significant development in Local Plan. It is set in open countryside and is divorced from existing settlements. It had not been demonstrated that there is a requirement to locate the development at this site or that there are other material planning considerations that would justify a departure from the development plan.

This still applies.

3. Retail elements not ancillary:

The Food and Garden Centre elements are significant and not considered to be truly ancillary to the tourist element of the development. They should be subject to PPS4 sequential tests. They are not justified as Enabling Developments. There is no appropriate planning mechanism by which the extent of retail sales can be controlled or to prevent their intensification.

We have not seen the business plan but, on the basis that sales other than entry fees probably account for over 45% of sales, this reason would probably still apply.

4. Not economically viable:

The economic benefits depend on the attraction of 485,000 visitors per annum. The Planning Authority is not convinced that this number is sustainable, which brings into question the deliverability of the claimed benefits but also the overall viability of the attraction.

We believe that this will probably still apply.

5. Development Plan Policy DP9: Employment in the countryside:

Proposal is in conflict with DP9 which states that employment proposals in the countryside should be of small scale and not harm the rural character of the area by the nature and level of activity and any other detrimental effects such as noise and pollution.

This still applies.

6. Development Plan Policy DP10: Development in the countryside:

Proposals must be compatible with the rural character of the surrounding area and avoid causing undue harm to the open nature of the countryside or designated sites. Urban areas of Colchester will be the focus for larger scale tourist, leisure and cultural facilities to ensure development at the most sustainable and accessible locations. The proposal is in conflict with this by virtue of its scale, location and design.

This still applies.

9. Parking Standards:

Parking requirements set out in the DP19 are not met.

This has probably been corrected

10. Building form:

The proposed development, and in particular that of the Main Building, is considered by virtue of its size, scale, mass and general design to be wholly inappropriate for this sensitive countryside location.

This probably no longer applies.

11. Listed buildings:

The Development will have an adverse impact of the Grade I listed Church of All Saints.

This still applies.

12. AONB:

It is not possible to determine whether there will be an adverse visual impact on the surrounding area and on particular views from the AONB. The Applicant has failed to satisfactorily demonstrate that the proposed development would not have a detrimental impact on the tranquillity of the AONB.

The first part of this may have been mitigated, but not the second.

13. Development in designated areas (which include AONB's):

PPS7 provides that Major developments in AONB's should not take place except in exceptional circumstances. The Warren Building is considered to be such a development. The Applicant has not adequately demonstrated a need for the development in this location or assessed the potential for providing the proposed development in some other way.

This has been mitigated to some extent by the removal of the Warren building in the new plans.

14. PPG17 and Haven Gateway Green Infrastructure Study (HGGIS):

HGGIS has shown that there is not a requirement for a new regional level Accessible Natural Green Space (ANGS) within the Stour Valley given its designated status. HGGIS states that it is vital that great care is given to the siting, scale and detailed design of new development to reflect local character and maintain distinctiveness of the AONB. ANGS must also be free at the point of entry (which HP would not be).

This probably still applies.

15. Protected Species:

The submitted protected survey strategy is now considered out of date and fails to provide an up-to-date mitigation strategy in respect of the Great Crested Newt.

This probably still applies. It is believed that studies in respect of the Great Crested Newt are still inadequate.

Appendix 3: Map and review of attractions in East Anglia

● Suffolk Punches

Suffolk Punches can be found at the venues marked. This includes breeding, working, displays, museum, recreations and experience days.

Form Shops/Form Produce (not marked)

Blackwells Farm Shop, Cuggeshall
 Assington Farm Shop
 Mid. Coughlens of Soresel
 Hall Farm Shop, Stratton St Mary
 Ragnorsk Farm, Levelod
 Looe Dairy Farm, Little Harbas by
 Rushbanks Farm, Wisangton
 Meertens Farm, Nr. Sudbury
 Waylands Farm, Sticks by Nayland
 Scotland Place Farm, Sticks by Nayland
 Toy Brook Organic Farm Great Toy
 Greenstead Farm, Nr. Halstead
 Butterfly Lodge Dairy, Abberton
 Whitehairs, Newton Green
 Hollow Trees, Hatfield

Farmers Markets (not marked)

Old School Community Centre, Long Melford
 St Peters Church, Sudbury
 Village Hall, Ipswich
 Community Centre, Dinglinghoe
 Works Hall, Estades, Cuggeshall
 St Marys Arts Centre, Tolchester
 Church Hall, Meaningness
 Parish Church, Dedham
 Swan Hotel, Maldon
 Thurstable School, Tiptree
 Grove Shopping Centre, Witham
 William Leakes Hall, Wizenhoe
 Corn Hill, Ipswich
 Jimmy's Farm, Wisbead

● Gardens / Garden Centres

Beth Chitto Gardens, Elmstead Market
 Green Island Gardens, Arleigh
 Blake in Garden Centre, Arleigh
 Hall Farm, Arleigh
 Hearns Colgate Nursery, Tuxford
 Lord Bergholt Place/A Place for Plants
 Lindesay Design Nursery, Dersham
 Dly Pans Nurseries, Chapel St Mary
 Ishingtons London Centre
 Hillpals Nursery, Beod
 Centre of Caltheus, Wylead
 Wyeade, Sudbury & Stowmy
 Bean Plants, Copland
 Poplar Nurseries, Marks Tey
 Will Rose Nursery, Aldham
 Works Hall, Cuggeshall
 Catch Nursery & Poneyland, Cuggeshall
 Bury Tree Garden Centre, Binintree
 Belkers, Greenstead Green
 Timmy Nursery, Colne Engaine
 Blackwell Nurseries, Rowhedge
 Shrublands Nursery, Arleford
 Garden World, Cleon
 Perrywood Nurseries, Inworth
 Spence's Garden, St Melthams
 Salford Hall, Binintree
 Framingham Nurseries, Framing
 Glenham Hall, Woodbridge
 Framingham Hall, Nr Ipswich
 Shrubland Park Gardens, Nr Ipswich
 Wyeon Hall, Bury St Edmunds
 Rougham Hall Nurseries, Bury St Edmunds
 Inworth Park and Gardens, Bury St Edmunds
 Abbey Gardens, Bury St Edmunds



● Access to the Countryside

Arger Fen
 Assington Tink
 Highwells Country Park
 Albaston Reservoir Nature Reserve
 Fingringhoe Wick Nature Reserve
 Friday Woods, Colchester
 Chalkney woods, Wixoe Colne
 Cornard Vale Nature Reserve
 Great Lannars Country Park
 River Stour Boat Trips, Sudbury
 Clare Castle Country Park
 Glemsford Picnic Site
 Iodbridge Picnic Site (walking, wildlife, singing)
 Doves Hall Environmental Centre (nature reserve)
 Lashes Meadow Nature Reserve, Nr. Henry
 Spence's Nature Reserve (south of Assington)
 Tiger Hill Nature Reserve (educational visits)
 The Constable Country Walk
 The Stour Valley Path
 The Essex Way

● Norfolk Shire Horse Centre & Countryside Collection

Stow Bardolph Rare Breeds Centre
 Gressenhall Farm and Workhouse
 Norfolk Rural Life Museum

Banham Zoo
 Digby
 Brassingham Garden & Steam Museum

Museum of East Anglian Life
 Stowmarket

Easton Farm Park
 Sutton Hood
 Halesley Bay

Dedham Vale AONB

Herkules Park Site

● Art / Museums

Clare Ancient Horse Museum
 Meford Hall (House, Garden, Park)
 Dedham Art Craft Centre
 Sir Alfred Mannings Museum, Dedham
 Lainsborough House, Sudbury (Thomas Gainsborough)
 Bridge Cottage - Flatford (John Constable)
 Field Studies Centre, Flatford
 Christchurch Mansion, Ipswich
 Colchester Castle Park & Museum
 Nesses Island Museum
 East Anglian Railway Museum, Chappel
 Follytree Museum
 Colchester Nature History Museum
 Tynperley Clock Museum, Colchester
 W. Hain's Tiptree Jam Museum
 Miner's Art Gallery, Colchester
 University of Essex Sculpture Trail & University Gallery
 Sudbury Heritage Centre & Museum
 West Stow - Bury St Edmunds
 Greene King Visitor Centre, Bury St Edmunds
 Mildenhall Museum
 Lavenham: The Guildhall and various other venues
 Colchester Visual Arts Facility

Local Circular Walks (not marked)

Leuenkeully/Nayland
 Assington/Orger Fen
 Long Melford
 Glemsford
 Stoke by Clare
 Laverham
 Chappel/Wakes Colne
 Foulsham Heath/West Bergholt
 Stoke by Nayland/Palswood
 'Warmingford' Bures
 Basted/Langham
 Great Toy/Cuggeshall

(Appendix 3 cont...) Review of attractions in East Anglia

A review has been carried out of the services offered by some key, well established, visitor attractions in East Anglia. Details for each of these is shown in the attached documents. The attractions reviewed are:

Willows Farm Village, St Albans
Old MacDonald's Farm, Brentwood
Hollow Trees, Semer, Ipswich
Jimmy's Farm, Ipswich
Hollesey Bay Colony Stud, Hollesley, Ipswich
Banham Zoo, Norfolk
Colchester Zoo, Colchester
Museum of East Anglian Life, Stowmarket, Suffolk
Sir Alfred Munnings Museum and Garden, Dedham
Gainsborough's House Museum, Sudbury
Flatford Bridge Cottage, Flatford, Suffolk
Christchurch Museum, Ipswich
Kentwell Hall, Long Melford
Audley End, Saffron Waldon
Bressingham Gardens and Steam Museum, Bressingham, Norfolk

Conclusions that can be drawn for this study are as follows:

1 Visitor numbers:

With the exception of Colchester Zoo (755,000 visitors) and Willows Farm Village (320,000 visitors), no other attraction for which we have data exceeds 205,000 visitors per annum compared with 316,000 forecast for Horkesley Park. Colchester Zoo is the 14th largest attraction in the UK with over 270 different species of wild animals as its core attraction. Willows Farm Village has the whole of the London Area as its catchment area and is said by Sykes Leisure Projects to have a potential market of 86m people – nearly three times that anticipated for Horkesley Park. Yet its penetration rate is only 0.37% as compared with the predicted penetration rate of 1.04% at the Horkesley Park Stour Valley Visitor Centre.

2 General:

Nearly all the attractor elements anticipated by Horkesley Park are available in East Anglia. The only exceptions are the History of the Bunting Family and the Chinese Garden (which is being put in at the behest of Essex County Council and will take several years to mature). The **need** for Horkesley Park in an East of England context has not been established particularly as it has no prime attractor element.

3 Suffolk Punch:

Suffolk Punches are on show at Hollesley Bay Colony Stud (which is also a main

breeding centre), Easton Park Farm and Banham Zoo.

4 Art Galleries:

Collections of National importance of Constable, Gainsborough and Munnings amongst others are available at Christchurch Museum, Gainsborough's House Museum and Flatford Bridge Cottage and the Munnings Museum. Local artists are also well represented at events.

5 Shops and eating facilities:

All the Attractions have retail and eating facilities. In the larger establishments such as Willows Farm, these are very extensive. Such facilities are necessary to ensure viability and meet customer demand and Horkesley Park would be no different.

All of the Attractions allow you to bring your own picnics, which are apparently not allowed at Horkesley Park

6 Education:

Horkesley Park makes a feature of its ability to provide educational facilities for School Groups. These are already very well provided for at Willows Farm Village, Old MacDonalds Farm, Easton Park Farm, Hollow Trees, Jimmy's Farm (very extensive), Banham Zoo and Colchester Zoo, Museum of East Anglian Life, Munnings Museum, Christchurch Museum, Kentwell Hall and Audley End. In some cases, Audley End and Colchester Zoo, the education is free.

7 Opening Hours:

None of the Attractions are regularly open later than 6.30pm. (The summer time 'dusk' closing time anticipated by Horkesley Park could be as late as 9.30pm, which would make it exceptional)

8 Entry Fees:

Some of the Attractions are free to enter and the remainder are considerably cheaper. Only Banham Zoo and Colchester Zoo are more expensive than the £12.48 anticipated by Horkesley Park.

9 Historic Houses and mature gardens:

Horkesley Park has no historic house or mature gardens as attractor elements. Of the Attractions listed, Audley End and Kentwell Hall are outstanding in this regard. Audley End has gardens designed by Capability Brown. Bressingham also has a very important garden.

General comment;

From our studies we have also determined that, between 2009 and 2010 in the whole of England there was a 1% drop in attendance for paid-for attractions and a 6% increase in free attractions. Attendance in paid-for attractions by category was: country parks 3% lower, farms 6% lower, gardens 7% lower, wildlife/zoos 4% lower. Rural attractions dropped by 1% while urban attractions rose by 6%. Increase in local visits was driven by free attractions because of concerns over the domestic economy.

The source of our information is Table 3.3 and 3.4 of England Visit Trends 2009 – 2010.

Willows Farm Village – St. Albans 320,000 visitors	Product Feature
Price - Price per capita peak time admission = £11.58*	Online booking discount
Opening hours – 10 am to 5:30pm throughout the year	
Retail/Shop	Willows Gift Shop Farm shop
Cafe/restaurant	Woolly Jumpers Coffee Shop Farmhouse Restaurant Picnics – buy from us or <i>Bring your own picnic</i> Farmhouse BBQ Ice Cream Kiosk Woolly's Snack Shack
Public Events	Food Fair Daily events/shows throughout the year when open Farm shop displays and demonstrations
Attractor Elements	Sheep show stage: wallabies; reindeer goats; falconry centre with displays ; indoor play area; stables; petting area ; toddlers play area; carousel; JCB young drivers zone; animal feeding and petting area ; skating rink; lambing marquee; children's disco; agility play trail; tree house adventure; trampoline area; lakeside walks; sand pit play area; duck race; county fun fair rides; play tractors; sheep racing; Frisbee golf; events showground
Other corporate	Birthday parties = £16.50 per child School Groups Children's camp during holidays – standard fee = £39/child
Other	

*Based on 83% of child price, as child is more expensive than adult

Old MacDonald's Farm – Brentwood 110,000 Visitors	Product Features
Price per capita peak time admission = £9.55 Online booking price minus £1 from fee	Online booking discount
Opening hours – 10am to 5pm = April to Nov 4th 10am to 4pm = Nov 5 to March 31st	
Attractor Elements	Indoor and outdoor soft play areas; hatchery; tractor race tract; rubber duck race; bouncy barn & giant inflatables; hen house review; rides and themed amusements; adventure construction site; giant adventure area; tractor and train rides; adventure trails' mini tractor driving track; steam train; milking cow; petting animals
Retail/Shop	Gift Shop
Cafe/ restaurants	Farm Cafe Picnic areas – <i>Bring your own picnic</i> Ice Cream Van
Public Events	Love our Zoo – not just a farm but a zoo too Pet our animal weekend -Peppa Pig- Punch and Judy Shows - Old Mac's Treasure Trail Halloween - Grandparent's weekend
Other corporate	Birthday parties Schools Groups – Key stage 1 &2

*Based on 83% of adult price

Easton Park Farm – Easton Suffolk 50,000 visitors	Product Features
Prices – Price per capita peak admission = £6.84*	
Opening hours – 24 March to 9 Sept. 10:30am to 5:30pm 27 Oct. To 4 Nov 10:30 to 4pm 11 to 19 Feb 10:30 to 4pm	
Attractor Elements	Indoor soft play barn; outdoor adventure play area; farm animals to meet and feed ; pony rides; pony and cart rides; train rides; hug a bunny; meet a Suffolk Punch Horse ; Walks down to river Deben; listed

	historic buildings Craft Workshops
Retail/Shop	Gift Shop Farmers market
Cafe/restaurant	Barmy Barn Cafe Or bring your own picnic
Public Events	Events for 2012 – Magic Monday; A Day in the Country; Maverick Festival – Blue Grass music; and Motor Show
Other Corporate	Birthday parties - £15 10 child minimum School groups – accredited Farms for schools – any keystage, including GCSE and beyond
Other	Caravan site for 5 caravans 4 Cottages to rent

*Based on 83% of adult price

Hollow Trees Semer, Ipswich Suffolk	Product Features 140 acres of mixed farm
Prices - £1.50 entry charge for trails	
Opening hours – 9 to 4pm all year round	
Attractor Elements	140 acre mixed farm part of stewardship scheme to farm for benefit of wildlife – 13 ponds to encourage wildlife – Owl nesting boxes ; Farm trails into Pogal's pit (adventure playground) and the livestock barn – dirty Dave the Tractor – the Rolly Polly Pole – Goat mountain – mini tractors and Welly Game. Many different farm animals to see . Feed the animals; Tractor and trailer covered wagon
Retail/Shop	Farm Shop – vegetables, meat and local food and beer, wine and cider Plant Centre and Pet food with winter fuel Christmas trees in Dec.
Cafe/restaurant	Award winning Coffee shop with simple meals and fully licensed Or bring your own picnic
Public Events	2012 Hollolympic Games Vegetable Festival Halloween Festival Festival of Food Tea with Santa
Other Corporate	Birthday Parties Food and Farming Student Days

	School visits – Tues., Wed. and Thursdays
Other	

Jimmy's Farm Ipswich Suffolk	Product Features
Prices only for events, courses and groups	
Opening hours Spring and Summer – 9:30am to 5pm Winter – 9:30am to 4pm	
Attractor Elements	Nature trail , Butterfly House and Woodland Walk; Fishing with Dolly Rare breeds Gardens – herb, vegetable and Darwin's;
Retail/Shop	Farm Shop Online Farm Shop Garden Shop – 10am to 4pm Joules Clothing – 10am to 4pm Butchery
Cafe/restaurant	Restaurant – 9:30am to 5pm Field Kitchen – 9:30am to 3pm Or bring your own picnic
Public Events	Produce and Craft Market Events – Comedy nights, Sausage and Beer Festival, Harvest Festival, Halloween, Christmas Fayre, Science Festival
Other corporate	Birthday Parties Coach group options Kids Holiday Activities Educational visits – 1. <u>Farming & Food production</u> – early years, foundation stage, Key Stage 1,2,3 and 4 2. <u>Sausage making and tasting</u> – Key Stage 2,3 and 4 and further education NVQ 3. <u>Environmental Science</u> –Early years and Key Stage 1,2,3 and 4 4. <u>Bushcraft in the Wood</u> - Early years, foundation stage, Key Stage 1,2 and 3 5. <u>Orienteering Trail</u> –Key Stage 1 an 2 6. <u>Jimmy's Farm as a business</u> – Key Stage 3 and 4 7 and 8. Day courses – School and group fun visits both supervised and

	unsupervised 9. Butchery courses Corporate Events – Breakfast, themed evenings and networking
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Hollesley Bay Colony Stud Hollesley, Suffolk Less than 50,000 visitors p.a	Product Features
Prices – Price per capita peak time admission £5.40*	Cyclist and walkers minus 1
Opening hours - 10:30 to 5pm 1 July to 31 Aug –7 days per week 1 Sept to 4 Nov – Wed to Sunday 31 March to 30 June – Wed to Sunday Also open Easter and Bank Holiday Mondays	
Attractor Elements	Come and see the Suffolk Punch horses and this seasons foals and rare breeds - rare Large Black Pigs, Red Poll Cattle and Suffolk Sheep Horse drawn Large vehicles (over 60) and implement display Display of show harnesses Heritage exhibition and cinema – displaying many aspects of life in Suffolk Horse drawn wagons Play area
Retail/Shop	Gift Shop
Cafe/restaurant	Coffee Shop – light lunches and tea <i>Or bring your own picnic</i>
Public Events	
Other corporate	School Groups – Experience of farming and countryside as it was and relating it to rural life today. Group visitors with guided tours Hire of Trust’s horses, vehicles and professional drivers for weddings, funerals and advertising work
Other	Suffolk Punch Trust is a registered Charity

*Based on 83% of adult price

Banham Zoo Banham Norfolk 202,000 visitors p.a (2009)	Product Features
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Prices – Price per capita peak time admission £14.90*	Online bookings with discount
Opening Hours - 9:30am everyday Spring and Autumn closes at 5pm Winter closes at 3pm Summer closes at 7:30	
Attractor Elements	Over 2000 animals and 35 acres of gardens Horse drawn Dray – using the Zoo’s Suffolk Punches or other Shire Horses Feed the Llamas, rats, goats and sheep in the Barn and Mongolian sheep and ducks on the Woodland Walk with food from animal feed machines.
Retail/Shop	
Cafe/restaurant	Parrot Pavilion Southern Fried Chicken Outlet Trading Post Coffee Shop Snack Shacks – located around the zoo for snacks, drinks and ice creams Or bring your own picnic
Public Events	Car Boot Sale – every Sunday from 7am On the Day Experiences – Introduction to falconry ; Giraffe Feeding; Meerkat feeding Pre- Bookable Experiences - Big Cats; Birds of Prey; Junior Keeper for the Day; Keeper for the Day; Heavy Horses, including Suffolk Punches (for a full day or half day).
Other corporate	Rent out heritage vehicles drawn by Suffolk Punches or other Shire horses Birthday Parties Commercial Filming School Groups – Early years through GCSE and further Research Outreach Bizarre Beasts Roadshow Animal Sponsorship Photographic workshops
Other	<u>95% come by car</u> <u>80% come from home</u>

*Based on 83% of adult price

Colchester Zoo Stanway	Product Features With over 270 species to see, set in 60
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755,136 visitors	acres of beautiful parkland and lakes
Prices- Price per capita peak time admission = £14.93*	
Opening Hours - Colchester Zoo is open every day from 9.30am except Christmas Day. It closes from 5 to 6:30pm according to the season.	
Attractor Elements	There are over 40 daily displays, an undercover soft play area, 4 adventure play areas, The Lost Madagascar Express road train and much more. The Wild about Animals Theatre provides many interactive displays daily. Also open to visitors, is phase one of The Nature Area that encompasses a boardwalk around the scenic wetland habitat, with a specially constructed bird hide overlooking the lake and plenty of wildlife homes' such as bug hotels and bat boxes to help encourage different species to inhabit the area.
Retail/Shop -	The Ark Shop and the Acacia Shop these shops are open to all without paid entry to the Zoo, 7 days a week and there is free parking Online Shop
Cafe/restaurant	Cafe UmPhafa Colchester Zoo's Southern Fried Chicken The Pizza Lodge Tugela BBQ Meerkat Hangout Food Store Wrap Bar at Otter Creek Hot Dog Bar at Otter Creek Komodo Food Stop Tiger Taiga Chip and Dip Playa Patagonia Coffee Shop Ice Cream Parlour Or bring your own picnic
Public Events	Experiences – Keeper for a day, Zoo Academy Experience, Shadowing a Keeper, VIP experience and Team Building. The Perfect Marriage Proposal Zoolympics Trail Competition Keeper for a Day Occasional Late Summer night openings

	<p>Starlight Safari Night Book signing Evening Photography courses – beginners, introduction and advances Shriek Week – Annual Halloween events Several Christmas Events</p>
Other corporate	<p>Colchester Zoo Days on Channel 5. Birthday Parties Colchester Zoo offers over 50 education sessions from Foundation to Higher levels. These sessions take the form of talks, workshops and enclosure encounters. These sessions are FREE</p>
Other	<p>Won the coveted “Large Visitor Attraction of the Year” Award and the “Sustainable Tourism Award.” Is number 14 in the top 20 England Attractions that you pay to use.</p>

*Based on 83% of adult price

<p>Museum of East Anglian Life Stowmarket, Suffolk</p>	<p>Product Features Over 80 acres with 3km of woodland and riverside</p>
<p>Prices - Price per capita peak time admission £5.73*</p>	
<p>Opening Hours – 10am to 5pm Abbot’s Hall open all year Museum - Sunday 25 March to Sunday 11 Nov Crowe Street Cottages – twice daily tours Winter opening – only grounds and nature reserve open</p>	
<p>Attractor Elements</p>	<p>Buildings – Crapnell’s Blacksmith Forge, Alton Watermill with its cartlodge and millhouse; Boby Carpentry workshop building; The Mortlock Engineering Workshop and the Eastbridge Windpump; Edgar’s Farmhouse and Abbott’s Hall with stable block, walled garden; potting shed, gardens and barn and finally the William Bone Building Abbot’s Hall (Listed Grade 2*)– history of the Hall and its owners Come Dine with me – features quests chosen for their contribution to food and farming in East Anglia and how they have shaped the way we farm and eat here. A People’s Peculiar – exhibition on</p>

	<p>making of On Lifeguard Point – created 205 symbols to represent the East and what it means to live and work here.</p> <p>Home from Home – Suffolk Lunatic Asylum for Pauper Lunatics.</p> <p>How Does your Garden Grow – displays of East Anglian Gardens and tools used in these Gardens</p> <p>Ask The Fellows who cuts the Hay – celebrates work of oral historian, George Ewart Evens</p> <p>Home on the Road – gypsy traveller community</p> <p>Crowe Street Cottage Displays</p> <p>Great Moulton Chapel – houses temporary displays</p> <p>The Settling House – demonstrates the development of timber framed buildings in the industrial era</p> <p>Collections telling stories of life in the market town and surrounding countryside as well as manufacturing and transport. Wide selection of machines and working engines.</p>
Retail/Shop	<p>Museum Shop</p> <p>Abbot’s Hall Enterprises is the Museum’s retail venture. Run as a Social Enterprise, it has as its goal a ‘triple bottom line’ of financial, social and environmental return.</p>
Cafe/restaurant	<p>The Osier Café</p> <p>Or bring your own picnic</p>
Public Events	<p>Steam and Crafts Weekend</p> <p>Measure for Measure</p> <p>The Doc Rowe Archive – Britain’s Folklore History</p>
Other corporate	<p>School Groups – Key Stage 1 & 2</p> <p>Materials in the Barn; The Shopkeeper’s Trail; The Pen and the Spade; Life in the Past; Victorian Schoolroom; The Materials trail; The Shopkeepers Trail; Gypsy Traveller Trail; From Field to Fork</p> <p>Group and Organization visits</p> <p>Courses – Work based learning based on 8 weeks structured courses or 2 Week practical skills, teamwork and communication skills to build self-confidence. Also, Skills for the Future a new 3-month taster course learning a</p>

	range of crafts and skills, which is funded by the Heritage Lottery Fund.
Other	Reminiscence Work – loan boxes that encourage conversation and reminiscence for care homes and groups

*Based on 83% of adult price

Sir Alfred Munnings Museum and Garden Dedham	Product Features Gallery and 40 acres of land
Prices - Price per capita peak time admission £4.15*	
Attractor Elements	House, a major gallery for original Munnings artwork and furniture, has been restored structurally. Well maintained gardens
Public Events	She Stoops to Conquer Production Changing Landscapes Project – funded by Dedham Vale and Stour Valley Project
Retail/Shop	Online shop
Cafe/restaurant	Tearoom or <i>Bring your own Picnic</i>
Other corporate	School Groups – Key Stage 1 & 2 Summer Art School Outreach and Group visits for a half day or full day
Other	

*Based on 83% of adult price

Gainsborough's House Museum Sudbury 17,600 visitors p.a.	Product Features
Prices - Price per capita peak time admission £4.15*	
Opening Hours – Mon to Sat 10 to 5pm Closed Sun. Good Friday and between Christmas and New Year.	
Attractor Elements	16 th century house and gardens Galleries devoted to the story of Gainsborough's life and painting . One gallery devoted to Gainsborough Dupont who was Gainsborough's nephew and studio assistant. Library of books, photos and archive material available by appointment.

	Garden – Centred on an original mulberry tree. Sudbury has been involved in the silk trade for centuries. One of the beds is devoted to plants, which traditionally were used for dyeing fabrics.
Retail/Shop	Museum Shop Online Shop Plants and seeds are for sale High quality images and photographs that require permission to use.
Cafe/restaurant	Small Coffee Shop <i>Bring your own picnic.</i>
Public Events	Home and Abroad – drawings and watercolours from a private collection
Other corporate	School groups Sat morning art classes for children Print workshop – with both long and short course and both day and evening courses Printmakers Gallery
Other	

*Based on 83% of adult price

Flatford Bridge Cottage Flatford 120,000 visitors p.a.	Product Features
Prices – free entry but £3 charge for car park	
Opening Hours – generally open 10:30 to 5:30pm Only open weekends in winter	
Attractor Elements	Life and works of John Constable housed in the 16 th - century Bridge Cottage Circular walks around riverside and lake margins, woodland and grassland. Rich lowland landscape Wander around wildlife garden Row a boat Daily guided tours 5 Weekends per year to see buildings that are normally closed to the public.
Retail/Shop	Gift Shop – with local suppliers Vegetables and herbs available from Valley Farm for a small donation Second-hand books from the Information Centre
Cafe/restaurant	Tea Room

	Ice Cream Kiosk <i>Bring your own picnic.</i>
Public Events	Boat House Gallery exhibits local artists ; Warden Walks; Walking in the Footsteps of Constable; Flatford Explorer Trail; Storytelling and Activities ; Dedham Vale in Summer; Essex Way Wander; Wild Harvest Walk; Heritage Open Day – Valley Farm; Secrets of the Stour Navigation; The Five Churches Ramble; The Buildings at Flatford
Other corporate	
Other	

Christchurch Museum Ipswich	
Prices - free	
Opening Hours Tuesday - Sunday, 10am - 5pm Closed on all Mondays and 24th to 27th December and 1st January	
Attractor Elements	Tours of house – Tudor kitchen, Victorian toys and games, Lowestoft porcelain, Suffolk artist gallery and the Wolsey Art Gallery. Largest collection of Constable paintings outside London.
Retail/Shop	Gift Shop
Cafe/restaurant	Cafe – can buy a picnic to eat in the grounds Or <i>bring your own picnic</i>
Public Events	World Book Launch: The Pelikan Way by Dr Mantz Henry VIII – Tudor tales Toy Talks Wine and Talk: The Middenhall Treasure Emboss a mini Middenhall Dish Pottery Workshops Timelord Tales
Other corporate	School Groups – Toys – Key Stage 1; Victorian Home – Key Stage 1; Upstairs Downstairs – Key Stage 2 and Tudor Trades – Key Stage 2 Evening Hire -Weddings and receptions, Corporate functions, birthday parties, presentations Murder Mystery nights Day bookings for some rooms for

	meetings and/or lectures
Other	

Kentwell Hall Long Melford	Product Features
Prices – Price per capita peak time admission £8.21* Hall, Garden and farm £5.81* for Garden and farm	Online booking discount
Opening Hours -	
Attractor Elements	Family occupied moated Stately Home Tours of house Gardens – ancient, Lady Guthrie and Phillips designed Maze; Camera obscura, Ice House, Rare Breed Farm
Retail/Shop	Shop with tearoom
Café/restaurant	New Croft tearoom The Overcroft Stableyard Café and Grill The Undercroft Spit Roast Alehouse Picnics – not on the grounds but near the gatehouses. <i>Bring your own picnic.</i>
Other corporate	20 Weddings per year School groups - Over half a million school children have visited Events – Concerts, plays, opera and smaller performances with Buffet suppers or Kentwell picnics available or bring your own picnic Private dinners bookable Corporate filming
Other	Accommodation – cottages, B &B and Stately bedroom (Honeymoon Suite) and Grooms Cottage

Audley End Saffron Waldon, Essex 140,000 visitors	Product Features Tutor mansion, gardens and Capability Brown designed parkland
Prices – Price per capita peak time	

admission for house, stables and gardens = £10.80* Stables, Service Wing and Gardens only (not available on event days) = £7.47* Free visitors – members of English Heritage, free with member, schools, under fives and corporate visitors.	
Opening Hours – Open 7 months of the year and weekends only during the winter period.	
Attractor Elements	One of England's grandest stately homes that includes a Victorian Service Wing complete with kitchen, laundries and a dairy; the doors of a restored historic stables recently opened, complete with resident horses and a Victorian groom. Impressive formal gardens and the working Organic Kitchen Garden; William Sawrey Gilpin designed the Parterre in 1830; themed play area and the restored Audley End fire engine. The museum in the Stable Block covers the landscaping and development of the estate and includes an interactive audio and visual system.
Retail/Shop	The Shop sells a "Victorian Gardens" range plus a wide range of souvenirs regional food and products from the organic garden. English Heritage Online Shop
Cafe/restaurant	The Cart Yard Café The Tearoom Or bring your own picnic
Public Events	Events – Bringing Audley End to Life; Time Travellers Go...WWII, Cavaliers & Roundheads and Royal; Ugly Bug Safari; Jools Holland and his Rhythm and Blues Orchestra; The Greatest 80s Party; The last Night of the Audley End Proms; WWII: Soldiers and Spies; Apple Weekend and Game Week
Other corporate	Group Discovery Visits Weddings, Corporate events or private parties Free School trips
Other	Cambridge Lodge holiday cottage

Bressingham Gardens and Steam	Product Features
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Museum Bressingham, Diss, Norfolk	17 acres of gardens with over 8000 species and over 5 miles of narrow gauge steam lines
Prices - Price per capita peak time admission Museum and gardens with train rides = £10.75* Entry only = £7.26*	
Opening Hours – 28 March to 4 Nov with Christmas Santa Specials in Dec. Museum and Gardens open daily at 10:30am and closes at 5pm (5:30pm June to August and October at 4:30pm)	
Attractor Elements	Adrian Bloom's Gardens – Dell garden: Foggy Bottom Garden; The Summer Garden; Adrian's Wood; The Fragrant Garden; The Winter Garden. Take a trip on one of four railways or ride on the steam Carousel. The locomotive Sheds bring the power and the glory of steam engineering up close. The National Dad's Army collection has original props and vehicles.
Retail/Shop	Gift Shop attached to the Steam Museum Online Shop
Cafe/restaurant	Steam Museum Café Plant Centre Restaurant <i>Or bring your own picnic.</i>
Public Events	Inspiration Days at Bressingham Gardens; Children's Easter Entertainment and Egg Trail; MG Car rally; 1940s Day; Rover Rally; Zootastic's animal collection visits Bressingham; 2 Teddy Bears Days (Children with a teddy come in free); Steam in miniature; Day out with Thomas; Vintage Farming ; Spooky Halloween Half Term and Halloween Evenings. A day out for Groups of up to 32 people on a 1832 Steam bus.
Other corporate	Special arrangements for school groups
Other	B & B at the Hall Bressingham Steam Preservation Trust is a Charity No 266374

Appendix 4: Top 20 East of England Attractions

	Attraction Name	Category	Visitor Numbers 2010	Charge for Admission
1	Colchester Zoo	Wildlife	755136	DK
2	Whipsnade Zoo	Wildlife	428684	17.70
3	Imperial War Museum Duxford	Museum Art Gallery	399500	16.50
4	Anglesey Abbey Gardens & Lode Mill	Historic Property	231289	9.30
5	Cambridge University Botanic Garden	Garden	171863	4.00
6	Bewilderwood	Leisure Theme Park	160198	11.50
7	The Poppy Line (North Norfolk Railway)	Other	143761	10.50
8	RHS Garden Hyde Hall	Garden	135006	7.00
9	Blickling Hall	Historic Property	135000	10.25
10	Audley End House & Gardens	Historic Property	120102	11.90
11	Wimpole Hall & Home Farm	Historic Property	111998	8.40
12	Old MacDonalds Farm	Farm	110000	11.50
13	Hilltop	Historic Property	108938	6.50
14	Burghley House	Historic Property	97500	11.80
15	Felbrigg Hall, Garden & Park	Historic Property	94364	8.70
16	Knebworth House	Historic Property	89900	10.50
17	Colchester Castle Museum	Museum/Art Gallery	88488	6.00
18	RSPB Minsmere Nature Reserve	Wildlife	85415	5.00
19	Oxburgh Hall	Historic Property	71288	7.80
20	Gressenhall Farm & Workhouse	Museum/Art Gallery	67082	8.90

(Source: VisitEngland)

Appendix 5: Common Sense View on the Financial Viability of The Stour Valley Visitor Centre (Application No 120965)

Executive summary

It is difficult to believe that any significant number of visitors would pay any money to visit a Heritage Centre that:

- has a tiny recently replanted country park which people can *currently* walk across for free
- has an Art Centre with no art
- has a garden that will only just have been planted.

Even assuming that more people visit Horkesley than any other admission charging UK Heritage Centre (150,000 rather than the *unrealistic 316,000* claimed) and that those visitors are prepared to pay more than any other comparable attraction (£7.50 rather than £14.50), the annual loss *before interest and tax* (using numbers based on Buntings previous numbers adjusted for real life experience elsewhere) would *probably be up to £2.5m for the reasons shown below.*

It is difficult to see who would lend the Buntings any money to fund this proposal. Even if they achieved funding, the Centre would close after a short period of this type of loss. *Our conclusion is* that the Centre is not a commercial venture, and the only reason for this application is for the Buntings to get permission to erect buildings which will ultimately be used for other commercial purposes, most likely shopping.

Introduction

As part of the SVAG response to the 2009 Horkesley Park proposal, Application No 090231, we carried out a common sense critique of the business plan put forward to support the proposal. This can be summarised as follows (the full detail is in Appendix 1).

		£
Sales		
Tickets		3,181,692
Food & beverage		2,845,030
Merchandise		<u>7,288,449</u>
		13,415,171
Cost of Sales		
Food & beverage	711,258	
Merchandise	<u>3,644,225</u>	
		<u>(4,355,483)</u>
		9,059,688

Costs and trading overheads	(5,472,180)
Non-trading overheads	<u>(2,405,000)</u>
Net Pre-tax profit	<u>1,182,508</u>

The findings of that analysis were that the business plan was based on a number of extremely optimistic revenue assumptions (visitor numbers, spend per head etc.) and, that if more realistic assumptions were used, the plan would show a material loss. In summary, as presented the business plan was not remotely financially viable.

The purpose of this review is to do a similar examination of the revised business case for The Stour Valley Centre. This is complicated by the fact that this time the Buntings have not provided a full business plan. However, they have made available the following information:

- total annual visitor numbers are 316,000 (2009 plan: 476,000);
- their average expenditure on admission is £12.41 gross (£10.34 net of VAT) (2009: £12.41 and £10.56);
- their average expenditure on other items at the Park is £10.94* gross (£9.14 net of VAT) (2009: £21.28 gross);
- the number of FTE employees is 106 (2009 plan: 155).

* per para 1.40 of the Socio Economic Impact Assessment total spend at Horkesley Park is assumed to be £23.15 (£37.37 less £14.22) of which £12.41 is for admission.

The following assumptions can also be made to derive a full business plan:-

- (i) the gross margin on both food & beverage and merchandise is 50% (in 2009, it was 75% for food but 50% is the industry benchmark);
- (ii) the split of other sales between food & beverage and merchandise is 50%;
- (iii) the following costs in the 2009 plan are fixed:

	£
Advertising & promotion	300,000
Livestock husbandry	155,000
Land, Garden & Grounds upkeep	38,000
Security/cash collections	<u>22,075</u>
	<u>515,075</u>

The balance of the costs 4,957,105 (being £5,472,180 less £515,075) are variable and are reduced in line with the fall in visitor numbers (i.e. by the fraction 316/476).

On the above basis the full business plan is:-

Sales	£'000
Tickets (316,000 @ £10.34)	3,267
Food & beverage (316,000 @ £4.57)	1,444
Merchandise (316,000 @ £4.57)	<u>1,444</u>
	6,155
Cost of sales	
Food & beverage (1,444,120 @ 50%)	<u>(722)</u>
Merchandise (1,444,120 @ 50%)	<u>(722)</u>
	4,711
Gross profit	
Costs	
Fixed Costs	(515)
Variable costs (4,957,105 x 316/476)	<u>(3,291)</u>
Net trading profit	905
Depreciation (825,000 x 316/476)	<u>(548)</u>
Profit before interest & tax	<u>357</u>
Loan/mortgage interest	<u>(???)</u>
Profit after interest before tax	<u>???</u>

So there is an estimated profit before interest and tax (albeit very slim for the capital outlay needed for this project) **BUT** there are three major flaws with this business plan:

- (i) the visitor numbers are grossly overstated;
- (ii) the assumed ticket prices are too high;
- (iii) the average spend per head on food & beverage and merchandise is overstated;

Each of these areas is examined below in order to get a more realistic estimate.

Visitor numbers

The following considerations are relevant:

- (i) It is common sense and generally accepted that a visitor attraction has to have a central theme to attract visitors e.g. a historic monument or a theme park or a museum.

Horkesley Park has no central theme.

Buntings' Tourism Evaluation Report claims that "Key elements include a Country Park, an Art Gallery and Gardens" but:

- the country park is 100 acres requiring "reinstated parkland" and "new woodland and parkland trees" and will still have existing footpaths (p38) so will effectively be available for free. The other country parks cited as comparators in the report (Croxteth, Staunton and Wellington) all have at least 350 acres of original parkland. Great Horkesley therefore does not qualify as a Country Park;
- the Art Gallery has no art and there is no good reason why any collection of Constable or other famous paintings would be located there;

- The Gardens are currently non-existent and it will take many years until they are sufficiently well established to attract visitors.

So, Horkesley Park relies on being a Heritage Centre with a range of seemingly unconnected elements none of which have any competitive advantage (for example fly fishing in streams converted from irrigation systems and a mountain-based garden design on a flat 1 acre plot!).

- (ii) The top 10 heritage centres in the UK had the following visitor numbers in 2010:
(Source: *Visitor Attractions Trends in England 2010*)

Attraction	2010	Entry price £
National Memorial Arboretum	274,900	Free
Grizedale Forest Visitor Centre	176,289	Free
Newcomen Engine House	165,000	Free
Northumbria Craft Centre	141,650	Free
Pendle Heritage Centre	132,663	3.30
Bletchley Park	120,000	10.00
Anderton Boat Lift – Lift Trips	116,000	7.00
Inspired By ...	111,342	Free
Sutton Bank National Park Visitor Centre	103,468	Free
Purbeck Information & Heritage Centre	64,509	Free

So the Business Plan is making the extraordinary case that it will attract more visitors than any of these, despite seven of them being free and the other three (one of which is Bletchley) attracting less than half the numbers claimed by Horkesley Park.

- (iii) The 2009 report predicted that 119,000 people (including season ticket holders) would come to see just the Gardens (admission price for an individual adult: £6.45) and 40,000 would come to just the Art Centre (admission free). The current proposal does not have 4 separate pricings for Gardens only, Art Gallery only, Country Park only and Combined Park, but has one tariff which covers entrance to the site (admission for individual adult: £14.95). Given the poverty of the Gardens Feature and the Art Gallery, and the fact that entrance to these is at the full rate, it is inconceivable that very many people would come to visit Stour Valley Centre for the purposes of seeing just the Gardens or the Art Gallery. Therefore, the previous 2009 projections of 476,000 should on a like for like basis be reduced by these one feature visitor estimates to give a current projection of 327,000. This is in line with the current estimate of 316,000 but the present proposal has been considerably down-sized in terms of what it offers so the estimate should be reduced.
- (iv) The current projection of 310,000 is critically dependent on an assumed penetration rate of a potential market based on a 2hr drive time. The expansion of the target zone from 1hr drive to 2hr drive increases the potential market from 5.6m to 29.7m. It is our view that an attraction which has no national interest, no distinguishing feature and no historical connection is likely to appeal far more to local people than it is to those who live outside the 1hr zone (who is really going to drive down the A12 from the centre of London to visit this motley collection of assets?). In consultation with owners of other comparable attractions, they have expressed a view that a more usual drive time zone is 1½hr (which would take most of London out of the catchment area, dramatically reducing the target

market). Therefore, taking the 2hr zone as the target market grossly exaggerates the number of potential visitors.

Taking all of the above into account, we believe a more realistic estimate of the number of visitors is 150,000 and even this is very ambitious.

Pricing

(i) Comparison with selected private sector run parks (table 4 in the Sykes report)

Sykes are claiming that Horkesley Park, which has nothing of original or historic interest and with its reclaimed 100 acre park will be able to charge double the following three country parks:

Croxteth Hall - historic home of Lords of Sefton with Queen Anne house, original Victorian home farm and walled garden and 500 acre country park.

Staunton Country Park Farm - original Victorian farm and walled garden and 1000 acre country park.

Wellington Country Park - 350 acres original parkland and children's entertainment with full animal farm.

Hop Farm, Marsh Farm, Fishers Farm, Hatton Farm, Willows Farm and Old MacDonald's Farm are all children's theme parks and are, therefore, irrelevant. The same is for the two wildlife parks.

(ii) Comparison with selected gardens

Sykes has suggested that Horkesley Park, with its brand new 5 acre garden in the grounds of a normal residential house, will charge significantly more than:

Bressingham Steam Museum - charge for gardens and museum alone is £6.75 not the £12.95 shown in the table.

Newstead Abbey Gardens - 300 acres of park and gardens around Lord Byron's old home.

Hidcote Manor - one of England's great Arts and Crafts gardens.

Claremont Landscape Gardens - described in 1726 as "the noblest garden in Britain".

Compton Acres - established since 1924.

Waterperry Gardens - a historic horticultural school.

Nymans - established as a garden since the 1930s in the grounds of gothic ruins.

Sheffield Park Gardens - 18th century Capability Brown garden.

The Alnwick Gardens - with famous Grand Cascade, rose garden and treehouse.

4 x RHS specialist gardens.

Clearly the inclusion of Butchart Gardens in Vancouver is designed to show a high entry price. This is one of the most renowned gardens in the world, 55 acres and a National Historic Site of Canada.

(iii) Comparison with other UK Heritage Centres

The only possible description of Horkesley Park is as a Heritage Centre so it is interesting to compare its Admission Price with those of the other UK Heritage Centres.

Of the nearly 100 UK heritage centres listed in the 2010 Visitor Attraction Survey, only two charge more than £7.50. One is Bletchley Park and the other is Steep Holm which is a day trip by boat to a private island in the Bristol Channel.

The average adult admission charge for visitor/heritage centres in the UK in 2010 is £6.00. (*Source: Visitor Attractions Trends in England 2010*). For Country Parks it was £5.25.

(iv) Comparison with other attractions in the East/Colchester Zoo

The average adult admission charge in 2010 for attractions in the Eastern Region was £6.02. (*Source: Visitor Attractions Trends in England 2010*).

In Table 3 of their report, Sykes compares the adult admission of Colchester Zoo of £16.99 with the £14.95 charged by Horkesley Park superficially giving rise to a favourable price – value relationship (based on the estimated stay). However, the more valid comparison is the actual admission spend per head which, due to the fact that c.1/3 of the visitors to Colchester Zoo are season ticket holders, (who visit more often and therefore pay less per visit) is £8.82, 30% less than the anticipated admission spend of £12.41 for Horkesley Park.

The evidence above, suggests that £7.50 including VAT (£6.25 ex VAT) would be the maximum admission price for Horkesley Park, which is generous in the early years given the time it will take it to develop the gardens and the park to make it feasible as a visitor attraction.

Spend per head

Food & beverage spend

<u>Attraction</u>	<u>Spend (ex VAT) per head</u>
	£
Cotswold Wildlife County Park	3.10
Waddesdon Manor	3.94 *
Colchester Zoo	2.00
Horkesley Park (derived)	4.57

* Waddesdon is right at the top of the market and admission is free

It is difficult to see why Horkesley Park should have a higher spend per head on food and beverage than Colchester Zoo so a better estimate for spend is £2.50 per head (average of Cotswold and Colchester Zoo).

Merchandise spend

Again, statistics for the above attractions are:

<u>Attraction</u>	<u>Spend (ex VAT) per head</u>
	£
Cotswold Wildlife County Park	1.83
Waddesdon Manor	1.76
Colchester Zoo	1.08
Horkesley Park (derived)	4.57

The derived income from merchandise is massively overstated compared to comparable venues. A more realistic assumption might be £1.50 per head (average of the above).

Other observations

Start-up losses

The document is silent as to how long it will take to reach the aspirational visitor target of 316,000. It is inconceivable that it will hit that target in Year 1 and, in common with all visitor start-up businesses, it will be a number of years before customer awareness and the strength of the franchise will be sufficiently established so as to deliver the estimated outcome (as an example it has taken 25 years for Colchester Zoo to grow its visitors from 100,000 p.a. to the current level of over 500,000 p.a.). In the period to achieving the desired level of visitors, the business will incur substantial start-up losses.

Marketing expense

The industry rule of thumb is that marketing expenditure for a mature and developed business is 8-10% of revenue which would be c. £300k for Horkesley Park. The expense for a start-up business, particularly one which is seeking to attract visitors from London, will be significantly higher in the earlier years. In the business plan above, we have assumed marketing expenditure of only £200k (based on the Sykes' estimate of £300k in the 2009 plan), so this item is likely to be materially understated.

Funding

There is no information given on the capital outlay required on the funding (the 2009 plan envisaged a total capital invested of £25m of which part was debt funded (annual loan interest was £1.3m)). Given the ambitiousness of the forecasts, the fragile state of the economy and the reluctance of banks to lend to speculative enterprises, it is highly unlikely that this plan would attract any material amount of debt funding unless it was secured by alternative means (e.g. external 'friendly' guarantee, security on another Buntings asset etc.) i.e. the debt would not be lent on a commercial basis. If the project were supported entirely by equity (which from a truly commercial point of view it would need to be), the expected return of £358k would represent a negligible return on the likely level of investment (£10m+) and would be unthinkable on any commercial basis given the significant downsides.

Summary

So, to summarise the above:

	<u>Business plan assumption</u>	<u>Realistic assumption</u>	<u>Effect on profit using realistic assumption *</u> £'000	<u>Resulting net profit(loss)</u> £'000
Visitor numbers	316,000	150,000	(1,716)	(1,359)
Admission price	£10.34	£6.25	(1,292)	(935)
Spend per head				
- Food & beverage	£4.57	£2.50	(327))
- Merchandise	£4.57	£1.80	(437)) (407)

* assuming all other assumptions remain constant

Changing just one assumption to a realistic basis creates a significant overall loss for the project. If all three realistic assumptions were adopted, the project can be estimated to make a loss before interest and tax of over £2.5m - a staggering figure!

Conclusion: on the basis of the information that Buntings have provided, this business plan is not financially viable on any realistic basis. It does not make any sense from either a commercial or financial point of view. In short, it is a complete sham.

J Eddis FCA

APPENDIX 1**2008 P&L**

£

Sales

Tickets		3,281,692
Food & beverage		2,845,030
Merchandise		<u>7,288,449</u>
		13,415,171

Cost of Sales

Food & beverage	711,258	
Merchandise	<u>3,644,225</u>	
		<u>(4,355,483)</u>
		9,059,688

Fixed Cost & Trading Overheads

Management/Staff Costs (Gross)	3,038,237	
Rents	650,000	
Delivery & Distribution Costs	87,883	
Non Domestic Rates	402,455	
Insurance	150,000	
Heating, Lighting & Power	70,000	
Water & Sewerage	31,746	
Cleaning & Waste Disposal	89,882	
Building Maintenance Materials	46,953	
Equipment Maintenance	20,123	
Motor Expenses	22,080	
Equipment Hire	10,000	
Telephones/Communications	10,000	
Advertising & Promotion	300,000	
Printing, Stationery & Postage	70,000	
Professional Fees	24,000	
Entertaining	18,000	
Banking & Credit Card Charges	148,670	
Livestock Husbandry & Welfare	155,000	
Security/Cash Collections	22,075	
Land, Garden & Grounds Upkeep	38,000	
Miscellaneous	67,076	
Total Cost & Trading Overheads		5,472,180

Net Trading Profit**3,587,508****Non Trading Overheads**

Depreciation on Motor Vehicles & Equipment	825,000	
Loan/Mortgage interest	1,300,000	
HP Interest	280,000	2,405,000
Net Pre-Tax Profit		1,182,508

INCOME

	<u>No. of visitors</u> 000	<u>Admission revenue per head</u> £	<u>Merchandise and Food & beverage per head</u> £	<u>Annual income</u> £
Country Park Attraction	231	7.17	8.43	3,603,600
Gardens	101	5.05	5.93	1,108,980
Art Gallery	40	-	5.93	237,200
Combined Country Park & Gardens	44	10.56	12.39	1,009,800
Country Park season ticket holders	21	6.24	4.57	227,126
Garden season ticket holders	18	3.12	3.22	114,111
Combined Country Park & Gardens season ticket holders	21	9.36	6.72	337,792
	<u>476</u>			<u>6,638,609</u>
Food experience	352*	-	13.50	4,752,000
Gardening sales – centre	184	-	8.51	1,565,840
– internet	9	-	20.85	191,820
Horse drawn vehicles	51		1.91	98,174
Events & functions	9		18.34	168,728
				<u>13,415,171</u>

* estimated as comprising 75% of those visiting the Country Park, Gardens and Combined Country Park & Gardens; 25% of Art Gallery and 100% of Season Ticket holders