

STOUR VALLEY ACTION GROUP

Ms Sue Jackson,
Principal Planning Officer
Environmental & Protective Services
Colchester Borough Council
PO Box 889, Rowan House,
Sheepen Road
Colchester CO3 3WG

October 5th 2012.

Dear Ms Jackson,

The Stour Valley Visitor Centre at Horkesley Park; Application No 120965.

This letter is in response to the documents recently submitted to the Council by Bunting and Sons (the Applicant) in respect of the above Planning Application. These are:

- 1 Responses and answers to the Public Consultation dated September 2012.
- 2 Quantitative Assessment of the representations submitted to the Colchester Borough Council dated 17th September 2012.
- 3 Further information in response to matters raised by Colchester Borough Council in relation to Horkesley Park dated 11th September 2012.
- 4 Viability of glasshouses for horticultural use dated 5th September 2012.

Our comments are as follows:

1 Responses and answers to the Public Consultation dated September 2012

We stand by all the statements made in our response dated July 26th 2012 and the supplementary letter of July 31st 2012.

We do not consider that it would be helpful to answer each and every statement in the Applicant's document above as we are sure that the Council will form its own views based on the many consultation responses submitted to it. The very fact that there has been such a high level of responsible objection to the scheme from many organizations and individuals is evidence of the deep public concern about the application and this cannot be dismissed lightly by the Council. The Applicant's consultant (Collins and Coward Ltd) who has prepared this report has a vested interest in asserting that the consultation responses are not valid. The Council will no doubt take this into account in their own assessment. We do however make the following observations:

1.1 Stour Valley Action Group Meeting:

We are most concerned at the allegation made in the fourth bullet point of their para 2.3. We have no knowledge whatever of any statement being made concerning maladministration by the Council. Indeed the reverse is true and we have always held the Council Officers in the highest regard and have respected their integrity and independence over the eleven and a half years of Horkesley Park applications. The meeting in question was for SVAG members and other objectors to the latest application and this was made clear at the outset of the Meeting. We must regard any references made to the Council as being deliberate mischief-making by the Applicant and without foundation.

1.2 Planning Policy:

We note the extensive claims made by the Applicant that the analyses of lack of conformance with Planning Policy by many of the responders are wrong. These include the Dedham Vale Society, the Dedham Vale AONB and Stour Valley Project, the Colne Stour Countryside Association, the Nayland with Wissington Conservation Society, Little Horkesley Parish Council and specifically aimed at our Consultant, Pomery Planning Consultants, and Mr Bates Consultant, Andrew Martin Planning, are wrong. This is to be expected given that Collins and Coward are contracted to the Applicant and are unlikely to be independent in their view. Pomery Planning Consultant's comments on their findings are given in their letter to the Council dated September 25th 2012. What will really matter is the view taken by the Council's own Planning Policy department and we remain confident that they will find that the Application is contrary to Planning Policy at all levels but specifically at the local level. (It is a matter of regret that the Applicant chose to misspell the name of our consultant throughout their document).

1.3 Tourism Feasibility Study and Visitor Numbers:

The Sykes Tourism Feasibility Study is, in our view, probably the key document in the Applicant's submission. If this is wrong, then many of the other reports such as the DTZ Socio-Economic Report fall by the wayside. The recent document refers to the Tourism Study in many places. Paragraph 4.44 is but one example. Sykes of course is employed by the Applicant and is unlikely to reach conclusions that are adverse to its objectives.

The Sykes Report comes up with the expected visitor total of 316,250 visitors per annum. Clearly this is an example of spurious accuracy as no one could possibly predict numbers with such precision.

We have shown in our Response that visitor numbers are more likely to range between 120,000 and 150,000 per annum. This is a reasonable range for such a key prediction and we have reached this conclusion from our own analysis of the Sykes Report, the work done by our Financial analysts and, most importantly, from the conclusions of Visitor Attraction Consultants as detailed in our letter of 31st July 2012. We note that the Applicant makes no reference to this authoritative letter. We believe that our predictions are correct and that if this is

the case, Horkesley Park would not be of Regional significance in Planning Policy terms and would not be viable as proposed.

Para 5.39 and elsewhere refers to the comparison with Willows Farm and tries to use this to undermine our arguments. We make the point that Willows Farm has a catchment area of 86,540,837 which is vastly greater than that for Horkesley Park of 29,701,866 and still only gets 320,000 visitors per annum. Horkesley Park needs a penetration rate of 1.04% to get close to the numbers for Willows Farm which has a penetration rate of only 0.37%. Horkesley Park is an unproven attraction and we do not accept the contention that it will have more on offer than Willows Farm as stated in 5.39. To use Willows Farm as a predictor for numbers for Horkesley Park is clearly ridiculous.

The question of 'need' is referred to in para 5.38. The conclusions of this paragraph that "There is a clear and compelling case for such a visitor centre in this part of East Anglia" is highly subjective and cannot be substantiated by any proven demand. We maintain our contention that there is no need for Horkesley Park and all the elements except the Chinese Garden and Life and Times of the Bunting Family are available elsewhere in the Region.

We are advised that the Council is obtaining its own independent Tourism report and we are confident that this will support our views on numbers and the lack of need for this development.

1.4 Job Numbers:

Para 5.42 and elsewhere refers to the question of job numbers and the fact that they cannot be secured through an S106 Agreement.

Job Numbers are derived from the Socio-Economic report which is in turn dependant on the Visitor Numbers and Revenues predicted in the Tourism Report. Other expert opinion would suggest that Visitor Numbers are wrong as shown in our 1.3 above. Therefore this must impact on viability and job numbers and the prediction from the DTZ report. We make no statement about potential job numbers other than to state that the 106.4 FTE jobs claimed cannot be relied on. We stand by this statement.

It is also significant by omission that the Applicant apparently agrees with our statement that the number of jobs cannot be secured through the S106 Agreement.

1.5 Viability:

We maintain our position that the Horkesley Park project is almost certainly not viable. In para 5.40 the Applicant says that our assessment is based on the 2009 application. This is incorrect as the figures given for income are taken from the current application as shown on page 58 of the SVAG document. We have made assumptions on costs by extrapolation from the 2009 document which is entirely reasonable and cannot be dismissed out of hand by the Applicant. Our expert

financial analysis includes current information on visitor numbers, spend per head and admission prices from other attractions.

It remains a matter of regret that the Applicant has been selective in providing information on his Business Plan. Apparently this is not confidential to the Council and has now been issued to Essex Chambers of Commerce, Peyton Tyler Mears, Rayska Heritage, Visit East Anglia and Banham Zoo Ltd. The Applicant is only likely to have sent the document to organisations that will support his views and the recent letters of endorsement from these organisations must be treated with caution. On the basis that the Business Plan is now so widely available to others, it should now surely be open to full public scrutiny. This Business Plan will no doubt be based on the visitor numbers and income predictions from the Sykes Tourism report which we have demonstrated is almost certainly flawed.

We note that the Council will appoint its own consultants to examine the business plan and we would hope that the results of this will be made publicly available.

1.6 Carbon emissions:

Para 5.65 of the Applicants report refers to our statement about carbon emissions in para 13 of the SVAG report.

As stated, the Applicant has made no attempt to assess the carbon footprint of the development and he should be required so to do. We make no statement about the quantum of this.

The SVAG statement about 3000 tonnes of additional CO₂ being generated by people travelling to and from Horkesley Park is calculated as shown below:

Total visitors predicted by Applicant: 316,000

Total travelling by car: 90% = 284,000

Average number per car: 2.5

Number of round trip journeys: 114,000

Average round trip journey: 100 miles assumed based on most visitors coming from a one hour journey time (noting that the Applicant refers to visitors coming from up to a two hour drive time).

Total miles associated with Horkesley Park visitors: 11,400,000

Emissions for average family car taken as Ford Focus: 154 gm/km=246 gm/mile.

CO₂ generated by cars associated with Horkesley Park: 11,400,000 x 0.246 = 2,804,000 kg or 2,800 tonnes.

Additional CO2 emissions from coaches will take this total over **3000 tonnes** as stated in our response.

2 Quantitative Assessment of the representations submitted to the Colchester Borough Council dated 17th September 2012.

Our comments on this letter are as follows:

2.1 Latest numbers:

Our count shows that there are now 763 letters of objection and 356 letters of support. The level of objection is well over twice that of support. Responsible public opinion is overwhelmingly against Horkesley Park

2.2 Forged letters of objection (Para 4.0):

We have no knowledge whatever as to how these may have occurred. We have no interest whatever in trying to distort the already overwhelming number of letters of objection.

2.3 Petition (Para 5.0):

We do not accept that any credence should be given to the petition which was collected before the 2009 submission. It did not refer specifically to the 2009 Application and was targeted at saving the Suffolk Punch. It has no relevance whatever to the current application for Horkesley Park. It is not a reflection of Public opinion as claimed by the Applicant.

2.4 Representations of Objection (Para 6.0);

Insofar as it may be suggested that any of the Applicants comments are directed at SVAG, we do not accept the allegations of general scaremongering and misinformation made in the last paragraph of this section. All the information we have ever published has been based on the Applicant's documentation. Our interpretation of this information may have been different to that of the Applicant and not to his liking. The only area where we have made reasonable extrapolations of the information is in relation to Business Viability which the Applicant has refused to put in the public domain.

We have obviously used all the legitimate tools available to us to publicise our position and this has included posters, car stickers, letters to the Press, our web site and publications which have been restricted to our membership only. We have not indulged in door-knocking or leafleting as alleged. Where people have written in objection, they have done so entirely of their own free will having examined the pros and cons of Horkesley Park. Can the same be said of the Applicant's employees and others with a vested interest in it being approved?

2.5 Further analysis of representation from villages in the area near to Horkesley Park (Para 8.0).

We consider that this whole paragraph is irrelevant and no conclusion can be drawn from the large number of local people who expressed no opinion one way or the other. The fact remains that the majority of those writing objected to the proposals.

3 Further information in response to matters raised by Colchester Borough Council in relation to Horkesley Park dated 11th September 2012.

We note the Applicant's claim that the Stour Valley Visitor Centre at Horkesley Park has education at its heart. The programme of workshops and educational sessions proposed is very extensive and we wonder whether the Applicant has really considered the implications of staffing these with competent and qualified people bearing in mind issues such as CRB approval for staff involved with children. (From our experience in education all staff including cleaners and grounds staff require CRB approval if children are involved). These programmes will be expensive to put on and it would be interesting to see the costings associated. We would suggest that the Council needs to be satisfied that the total programme of workshop and educational sessions is deliverable.

We note in the fifth paragraph on page 19 that the Indoor Display Ring is to be used as a Farmers' Market on a monthly basis. This is a retail activity and therefore the Applicant's claim that retail space is limited to the shop and cafes is not correct as we have always contended.

4 Viability of glasshouses for horticultural use dated 5th September 2012.

We contend that the greenhouses could be viable for horticultural use as stated in our previous ADAS report. Even if the Council accepts the Applicant's position that they are not viable, this in itself, is not a reason for granting Planning Consent for a completely unrelated activity such as that anticipated by Horkesley Park. The Applicant has the option to revert the use of the land to agricultural use if they decide that they are incapable of using it for the horticultural use for which it is currently designated.

We trust that the Council will fully consider the issues raised in this letter.

Yours sincerely

W L Pavry
Chairman, Stour Valley Action Group

The Walnut Tree, Little Horkesley, Colchester CO6 4DG

