

HOGSHAW FARM & WILDLIFE PARK

Reference number: [REDACTED]

CLOSING SUBMISSION

Introduction

Hogshaw Farm & Wildlife Park (“HFWP”) is an established rural visitor attraction located directly next to the proposed Rosefield Solar Farm. We attract more than 70,000 visitors each year, employ around 35 people from the local area and operate under a zoo licence. Our business is focused on animals, wildlife, education and giving visitors an immersive countryside experience.

As we have said throughout the Examination, we support renewable energy in principle and sustainability is already an important part of our business. Our concern is the scale and location of this particular development and the cumulative effect it could have on our business and the surrounding area.

At the end of the Examination, we remain concerned that the Applicant has not properly assessed what the development will actually mean for HFWP as an individual rural tourism business.

Assessment of Hogshaw Farm & Wildlife Park

The Applicant now accepts two important points.

Firstly, HFWP will experience a moderate adverse significant landscape and visual effect.

Secondly, the Applicant itself assesses HFWP as a high sensitivity receptor, because the business is sensitive to environmental and access changes and has limited capacity to absorb or respond to them.

Despite this, the Applicant continues to conclude that the overall effect on the business will be limited and that its viability will not be affected, referring amongst other things to our “diverse attraction and business model”.

That is a clear assertion which has not been demonstrated.

There has been no meaningful business specific assessment of what the acknowledged effects could mean for visitor behaviour, visitor numbers, school visits, future investment or

employment. This is particularly important for HFWP because the countryside setting is not incidental to what we do, it is a core part of the attraction and one of the main reasons why visitors come to us. This was explained in detail in our Written Representation.

Buckinghamshire Council has also raised a wider concern about the Applicant's approach to assessing individual businesses. The Council considers that grouping businesses together into wider receptor groups can dilute the magnitude of the impacts experienced by particular businesses and has asked for greater transparency to make sure that higher sensitivities or greater impacts are not artificially diluted.

The Examining Authority has also specifically required the Applicant to identify the sensitivity and magnitude of change for each individual non-agricultural business receptor, expressly identifying HFWP within that question.

The Applicant accepts that HFWP individually is a high sensitivity receptor experiencing a significant adverse effect. However, once HFWP is considered as part of the much wider tourism economy, the overall tourism effect becomes slight adverse and not significant.

The wider size of Buckinghamshire's tourism economy does not make the significant effect on HFWP any less real.

Business viability and employment

We are also concerned that the Applicant has looked at the different impacts too much in isolation.

Our concern is the combined effect of the significant landscape change, construction activity, traffic and access problems, loss of tranquillity and the addition of another major infrastructure project to an area which has already experienced years of disruption from HS2, East West Rail and other developments.

These are all relevant to the same basic question: will people still want to come to HFWP and will they be able to get here easily?

We already know from experience that access disruption affects the business. Over recent years we have received complaints and requests for refunds because visitors have struggled to reach us. On occasions staff and customers have been unable to reach the site at all. We have also seen visitor numbers fall when we have had to communicate road closures and diversions.

The local leisure and hospitality trading environment is already extremely difficult. As we said in our Written Representation, a significant reduction in visitor numbers is not something that a business such as ours can simply absorb.

Against that background, we do not think it is enough for the Applicant simply to say that HFWP has a “diverse attraction and business model”. That conclusion has been reached without any detailed assessment of how the business actually operates or how sensitive visitor numbers are to changes in access and visitor experience. All of the different parts of our business ultimately depend on visitors coming through the gate.

We therefore remain very concerned that the combination of these impacts creates a serious risk to visitor numbers, future investment and ultimately the longer term viability of the business. If the business contracts, that would also place around 35 local jobs at risk.

Access and cumulative disruption

Access remains one of our greatest practical concerns.

The Applicant has argued that Rosefield will not result in the type of closures experienced with HS2 and has assessed the construction traffic as having no appreciable effect on our operation.

However, the latest Outline CTMP acknowledges that Snake Lane/Fiddlers Field is in exceptionally poor condition, partly as a result of traffic displaced by HS2 related road closures. It also confirms that reconstruction may be needed and that a further temporary road closure may be required.

The commitment to carry out those works outside the summer school holidays also remains qualified by the words “where possible and subject to approval”, which gives us little comfort.

We welcome the fact that our access concerns are now specifically recognised but this does not resolve them.

Whether the road is closed immediately before the main construction works or during them makes little practical difference to a family, school coach, member of staff or delivery vehicle trying to reach HFWP.

We are also concerned by the Applicant's conclusion that there is no cumulative traffic effect because HS2 and East West Rail traffic does not use the road network bordering HFWP. That does not reflect our experience of how the local road network operates and is difficult to reconcile with the Applicant's own evidence.

There is major ongoing HS2/EKFB construction activity around Edgcott and Quainton, approximately two miles from HFWP, on the same connected local road network leading into Claydon Road. That area has experienced repeated and long duration road closures associated with those works, causing diversions and displaced traffic across the surrounding rural road network.

The Applicant's own Transport Assessment confirms that Station Road/Dewes Lane has been used by HS2 traffic and that Snake Lane/Fiddlers Field is partly used by HS2 traffic to access an HS2 construction compound. It also confirms that the traffic surveys relied upon by the Applicant were undertaken during HS2 works and included traffic associated with that project.

The latest CTMP itself also acknowledges traffic displacement arising from HS2 related closures and proposes coordination with HS2 and other developers specifically to minimise cumulative impacts.

Our concern has therefore never simply been whether Rosefield and HS2 lorries use exactly the same road at exactly the same time. It is the cumulative effect of major construction activity, closures, diversions, displaced traffic, delays and the growing perception amongst visitors that this area is difficult to reach.

Notification and liaison are helpful but being told that access is going to be disrupted does not remove the impact on the business. HFWP has already experienced the consequences of prolonged infrastructure related closures elsewhere on the local road network. Being informed of another closure or diversion does not prevent visitors being deterred from making the journey.

Buckinghamshire Council has also specifically sought seasonal protection for visitor businesses such as Hogshaw Farm and a cumulative assessment integrating the effects of HS2, East West Rail and other major projects on the local economy.

If consent is granted, we therefore ask that the final traffic arrangements provide meaningful protection for access to HFWP, including visitors, staff, school coaches, deliveries and emergency vehicles, together with proper advance notice and coordination with other major projects.

Noise, tranquillity and visitor experience

We remain concerned about noise and tranquillity, especially in the quieter parts of HFWP.

Our acoustic evidence recorded very low sound levels and found that parts of the attraction were “very quiet indeed”. The report demonstrated something that the Applicant's original baseline did not: genuinely quiet areas exist within HFWP.

The Applicant has responded by pointing out that other areas of HFWP, such as play areas and car parks, are noisier.

That does not answer the point. We have never suggested that every part of HFWP is tranquil. The fact that a children's play area is noisy does not make our wildlife trail any less quiet or any less important to the visitor experience.

If consent is granted, we therefore ask that operational noise monitoring includes representative quiet areas within HFWP and that there is a clear mechanism to investigate and address any material impact on those areas.

Conclusion

The Examining Authority has had the opportunity to visit HFWP and see for itself the nature of the attraction, its relationship with the surrounding countryside and how important that landscape is to the experience we provide. We hope it has provided useful context to the issues we have raised throughout the Examination.

At the end of the process:

- the Applicant accepts a significant adverse landscape and visual effect at HFWP;
- the Applicant accepts that HFWP is a high sensitivity business with limited capacity to absorb environmental or access change;
- Buckinghamshire Council remains concerned that the assessment of businesses and tourism can dilute the impacts experienced by individual receptors;
- we have provided real experience showing that infrastructure related access disruption has already affected our visitors and our business;
- the latest CTMP itself acknowledges the relationship between HS2-related disruption, the condition of Snake Lane and the possibility of further road closure.

Despite all of this, there has still been no meaningful assessment of what these combined effects could actually mean for HFWP as a business. The wider tourism economy should not be used to dilute the effect on the individual business actually experiencing the impact.

There is a real risk that a significant change to our countryside setting, combined with further access and construction pressures, will affect visitor numbers, restrict future growth and investment and ultimately threaten the viability of a business supporting around 35 local jobs.



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Given the Applicant's own assessment of HFWP as a high sensitivity receptor, we do not think that risk can simply be assumed away.

We therefore respectfully ask the Examining Authority to give appropriate weight to the acknowledged significant effects on HFWP in its overall assessment of the Proposed Development and, if consent is recommended, to ensure that meaningful and enforceable protections are put in place for access, construction traffic and operational noise.

Yours faithfully,

Katherine Preston
Director

For and on behalf of Hogshaw Farm and Wildlife Park Ltd.