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Ms Nicola George  
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Dear Ms George

**Planning Application Reference: F/COL/05/1558 - Proposed redevelopment and change of use of Buntings Nursery site and adjoining land**

Thank you for providing the opportunity to comment on the above planning application. Having read through the tourism element of the proposal, the East of England Tourist Board (EETB) would like to make the following comments. It should be noted that comments are presented from an objective prospective.

**General**

There have been few tourism / leisure developments of such a size and significance in the region over the past decade. If this development were to go ahead it would certainly be regionally significant and perhaps nationally too. National recognition is likely to largely depend on the significance of the Constable and other nationally important artworks exhibited as this will act as the main draw to the site for visitors from further afield. It has not been clearly proven that there is sufficient 'overriding national interest' (a key requirement of large-scale development of this type in AONB's) for this development. Added to this it should be noted that the location of the site does not offer the same iconic status that helps to draw visitors to Flatford and Dedham and therefore it will need to be strategic in its choice of markets. Given the fact that the site falls within the boundary of the Dedham Vale and Stour Valley AONB, justification for its need is a primary consideration for this proposal and one that is clearly defined within the Colchester Borough Local Plan (Policy CO2).

**Viability**

The East of England Sustainable Tourism Strategy identifies that for many new visitor attractions, visitor numbers are often less than forecast often resulting in a need for higher than expected financial subsidy. This raises questions over the sustainability of such attractions. It is evident that a number of major attractions are running on tight margins and are exposed to the vagaries of changing public tastes and fashions. There are significant competitive pressures on major attractions in this region, caused by growing competition for leisure time and the ever-increasing tendency for higher spending ABC1 people to take short breaks and even day visits overseas.

Forecasting visitor numbers for a multi-use project of this scale is complex. We have examined the forecasts shown in the Tourism Assessment and in EETB's experience the very high number of visitors predicted to the proposed site (over 700,000) would appear to be somewhat optimistic, especially in the first few years of opening. A more conservative estimate would perhaps be in the region of 300,000-500,000 visitors per year (including day visitors that might use the park for informal recreational activities).

It should also be stressed that this level of visitors would be gradually built up over a period of time until the attraction itself is well established.

The potential to draw on such a large catchment area is significant in terms of attracting the day visitor market from London, provided the site is marketed well.

Visitors' willingness to pay an unspecified fee to enter the 'Country Park' is questionable, especially in terms of those wishing to use the site for informal recreation purposes only or for those visiting the wholly commercial garden centre and eating establishments.

The proposed number of covers to be provided at eating establishments would again seem very optimistic, especially given the site's somewhat rural location and the nature of the facilities provided. This is unlikely to be financially sustainable throughout the year.

### **Environmental Impact and Transport**

A key objective of the East of England Sustainable Tourism Strategy is 'to understand and disseminate best practice from around the world in creating car free recreational environments'. This is particularly the case in rural areas sensitive to intense pressure from large-scale tourism development. Whilst the proposal does suggest publicising alternatives to the car and developing a traffic free environment, it is inevitable that a high percentage of visitors will arrive and depart by private car. Given that the proposal is largely located within the AONB, impacts on the environment as a result of increased traffic flows and a significant expansion of car parking are a primary concern. Increased pressure on rural roads will undoubtedly lead to congestion during peak periods. The A12 is a principal route within the region and it is important that the development does not adversely affect its operation. However, we feel that any technical comments and assessment on the roads and access issues is best left to transport experts.

It has been suggested that some of the visitors to the Great Horkesley site could visit other places in the area connected with John Constable, including Flatford Mill and Dedham (2 regional honey pot tourist areas), both of which already have access and parking issues, especially during peak periods. Policy CO11 of the Colchester Borough Local Plan adopted in 2004 seeks to restrict development that could add significantly to existing visitor numbers at these sites.

### **Components**

There is some concern over how desirable such an attraction would be to visitors. Whilst the Constable interpretation experience and gallery in itself is likely to prove a particularly attractive day out with visitors, the overall mix of attractions and long-term viability is questionable.

In relation to the Constable interactive interpretation experience and gallery there is some doubt as to whether original works would indeed be loaned. The Tourism Assessment appears to provide no firm evidence of this. In order to create a truly memorable and desirable attraction it is envisaged that original works of national significance would need to be on display.

### **Disability Awareness**

We feel that there should be more references concerning the provision to accommodate disabled visitors and comply with the Disability Discrimination Act.

## **Conclusion**

Given a number of concerns over the viability of such an attraction and its potential impact on an already sensitive local environment, EETB feels that further clarification and justification is required in a number of areas of this proposal. In order to meet the key requirements of local, regional and national planning policy, particular emphasis should be placed on the stated *need* and national significance of such a large-scale attraction in this area.

Yours sincerely

Mark Johnson  
Development Officer