



31st March 2009

# The National Trust make their objections

The National Trust has written a letter to Colchester Borough Council making an unreserved objection to the Horkesley Park Application. It describes it as an unwarranted major development, inappropriate, unsustainable and out-of-scale, detrimental to the landscape on many counts. Specifically, it believes that rather than relieving pressure on the Trust's 'tourist honeypots' it will increase it, causing 'huge traffic problems'.

***This from the people who genuinely care for our landscape!***



## THE NATIONAL TRUST

*for Places of Historic Interest or Natural Beauty*

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Dear Mr Davies,

### **Application 090231 Horkesley Park - Proposed change of use and redevelopment of Buntings Nursery Site.**

Thank you for consulting the National Trust regarding the above planning application.

The National Trust was founded in 1895 as an independent charity to hold and manage, in perpetuity for the benefit of nation, countryside and historic buildings in England, Wales and Northern Ireland. The Trust fulfils its statutory responsibilities as laid down in the National Trust Acts, through ownership and direct management of the properties in its care.

As a consequence, the Trust owns over 900 properties and the majority of its land is held inalienably for the nation. This means that the Trust cannot freely sell or mortgage this property and that it is able to pursue an opposition to compulsory purchase which threatens inalienable property through parliament. This is a right that it shares only with the National Trust for Scotland and the Corporation of London. As the largest conservation organisation in Europe, the Trust's membership now exceeds 3.5 million members.

PRESIDENT: HRH THE PRINCE OF WALES

REGIONAL CHAIRMAN: SIR NICHOLAS BACON Bt REGIONAL DIRECTOR: PETER GRIFFITHS

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Registered Charity Number: 205846

Within the Dedham Vale the National Trust's total land holding is 211ha, with a further 1,691 ha of private land having restrictive covenants in favour of the National Trust – (some of which lie within a kilometre of the proposed development). It also has a number of vernacular buildings; most notably at Flatford where Willy Lott's House, Flatford Mill, Valley Farm, Bridge Cottage and the Dry Dock have been acquired since 1946. Shermans Hall in Dedham was acquired in 1979 and Thorington Hall at Thorington Street in 1940.

The Trust therefore has a major responsibility to conserve the quality of the heritage and landscape of the AONB throughout "Constable Country".

The Trust has previously commented on the earlier planning application (F/COL/05/1558) which was withdrawn however many of the concerns remain unresolved.

The Trust wishes to object to the current planning application for the following reasons:

### 1. PPS7 and major development in the AONB

PPS 7 gives AONB's the "highest status of protection" and states that major development should only be allowed in "exceptional circumstances". What sets the Dedham Vale apart from other river valleys is the assemblage of all aspects of the lowland English countryside which are considered quintessentially important: a gently sided enclosed vale; meandering lazy river; water meadows grazed by cattle; small fields surrounded by hedges and trees; church towers and half timbered cottages. It is not just the fact that these elements exist in close juxtaposition; it is that they still exist in a recognisable form, over 150 years after Constable painted them.

The Trust does not consider the applicant has demonstrated the circumstances for Horkesley Park are sufficiently exceptional to warrant allowing major development within the AONB.

### 2. Landscape

The "informal recreation" which is planned at Horkesley Park could lead to the creation of new surfaced paths (some of which may be accessible by vehicles), the fencing of horse pasture and erosion of the traditional landscape which makes this area "outstanding".

Careful consideration will need to be given to the appropriateness of planting, materials and surface treatments and to the visual impacts of buildings in relation to the surrounding landscape including longer views from elsewhere in the AONB.

### 3. Night Landscape

The National Trust believes that night lighting will be likely to have a great negative impact on the local nightscape both from exterior site and security lighting, as well as the light spilling from buildings (including the upper level of windows within the main building, which appears to be above the local tree canopy). The light pollution will be most marked in winter, given the proposed development's location on the valley side, with a potentially damaging effect over a wide area.

### 4. Scale

Although the applicant has submitted this application as a "Heritage and Conservation Centre" there is a strong concern that the majority of the built development is devoted to retail and catering. In addition to café/ restaurants there will be a garden centre and food retail outlet (effectively a farm shop - for local producers). The scheme also features a large 250 seat "Lecture Theatre" with its own independent restaurant which would be capable of being used as a conference/special event facility.

In reality therefore only a comparatively small proportion of the floor area of the main building is actually linked to heritage or conservation interpretation.

This is not an appropriate or sustainable location for large scale retail, catering and conference facilities which should be sequentially assessed with preference being given to sites within or on the edge of major towns. A countryside site within an AONB is not a sequentially preferable or sustainable location for these uses on such a large scale.

A feature of Dedham Vale noticed by visitors to the area for the first time over the last two centuries is its small size. In such small landscapes large structures can dominate and even ill-placed signs can have a significant detrimental effect. The siting and species of new trees, hedges and woodlands can have significant effects on the views across the Vale.

#### 4. Tourism

The development is likely to generate significantly increased interest in Constable and the potential for further intensification of visitors to Flatford and Dedham is of major concern to the Trust as it could have a seriously detrimental impact on the character of the AONB and the heritage setting of the buildings, villages and landscapes of Constable Country.

The proposal is being put forward by the applicant as a new major tourist attraction bringing in around 485,000 visitors. Although the visitor numbers have been reduced from the 700,000 in the previous application it remains out of scale with the area.

The present tourism honey pots in the Vale are centred on Flatford and Dedham. Based on car counter figures Flatford currently receives approximately 200,000 visitors a year. At no point have the car counters indicated as many as 250,000 visitors as is indicated in the supporting information to the application.

On busy weekends and Bank Holidays both Flatford and Dedham are at capacity or just beyond. The National Trust, Field Studies Council, Parish Councils, Countryside Agency, County and District Councils as well as the Dedham Vale Project have all striven for many years to manage visitor numbers in the area so visitors and locals alike derive pleasure from the area. The Green Tourism initiatives in the Vale have been praised at Ministerial level. Advertising is deliberately kept low key and visitor attraction is targeted at less busy times (outside the sunny summer peaks).

Once people have been given a taste of what Constable Country has to offer then it is very likely they will then wish to visit the actual sites of Constables paintings.

The Trust is concerned that the proposal will not therefore divert people away from Flatford and Dedham (as is claimed in the application) but would be more likely to bring a large increase in the number of visitors to the area particularly on peak days leading to huge traffic problems, requiring new areas to be identified for parking and potentially damaging the environment, character and rural tranquillity of the area.

It is of great concern to the Trust that the established tourist locations would not be able to cope with this great increase in the number of visitors. National Trust experience has found that visitor dissatisfaction with traffic congestion is cited as a primary reason which puts people off visiting places of interest.

#### Traffic

The potential for visiting Horkesley Park and Dedham/Flatford in one day are high considering they are both promoting Constable and the "stay times" are limited in each location. There is therefore an obvious potential for increased traffic along the B1087 and B1068 or via C class roads in the parishes of Boxted and Langham . These routes are within the AONB and any increase in activity could potentially have an adverse impact on the environmental carrying capacity of the area contrary to Colchester's planning policies for the Dedham Vale AONB.

The Transport Assessment submitted by the applicant includes an assessment of the potential for linked trips but fails to adequately address the environmental carrying capacity issue. The report relies on a piece of research carried out in 1998 by Buckinghamshire & Chiltern University which suggests 25% of honey pot visitors will also drive around the Vale then assumes 40% of these people would drive on to Horkesley Park. They estimate the trade draw between the sites will roughly equate.

These statistics in themselves seem low and (it is assumed) are based on a visitor rate of 250,000 a year (which is in reality nearer to 200,000) but it is the key periods that are of most concern. In this respect the report estimates that a maximum of 146 vehicles would move on from Horkesley Park to Dedham Vale on a peak attraction day (Sunday in August) (para 7.12.1). Assuming the movements from Flatford/Dedham are again matched it will therefore be likely to result in a considerable number of new additional vehicle movements through these areas.

It is also likely that the figures are reduced by containing an allowance for the Hopper Bus that they propose to operate between the two attractions. In reality if people have made a decision to set off to one attraction by car, they are unlikely to make a bus journey to the next one. Similarly if they have travelled by bus to one attraction they will be unlikely to want to travel on to another. The Hopper Bus will therefore only account for a very small percentage of onward visits and will not do anything meaningful to reduce increases in traffic through the Vale.

### Significance

The National Trust uses a Statement of Significance to weigh the positive and negative aspects of any proposals which may affect its land. To maintain the significance of the Dedham Vale traditional mixed farming must be allowed to continue; key aspects of the working landscape preserved, and public understanding of the importance promoted. This needs to be achieved whilst providing a sustainable level of access for residents and visitors. Tourism and outdoor education has a role to play in supporting the local community and its businesses, including the Trust's, but the level and type of visit must not damage the resource the visitors have come to see. The National Trust considers that although the visitor numbers have been substantially reduced in this proposal compared to the last one, the application should still be rejected as being completely out of scale and of an inappropriate nature and location. It would also be just as likely to have the potential to irreparably damage the tourist locations within the Dedham Vale which the National Trust and partners have striven so long and hard to cherish.

Yours faithfully,

Sian Derbyshire,  
Land Use Planning Adviser,  
East of England.