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THE NATIONAL TRUST
*for Places of Historic Interest or Natural
Beauty*

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– 19 December 2006

Dear Mr Davies,

F/COL/05/1558 – Proposed redevelopment and change of use of Buntings Nursery site.

Thank you for consulting with 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 the 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 3.3 million members.

Within the Dedham Vale the National Trust's total land holding is 211 ha, 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 National Trust wishes to object to the proposal for the following reasons:

Landscape.

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, 150 years after Constable painted them.

Much of the "informal recreation" which is planned at Horksley Park is on the highly visible valley sides. The creation of new surfaced paths, the fencing of horse pasture and existing public rights of way would break up the boundaries and erode the traditional landscape which make this area outstanding. In addition it is stated that visitors would be transported around the site in vehicles, the impact of a high level of vehicle movement on the slopes would be visible for some distance within the AONB. These issues could negatively effect the nationally protected landscape and be contrary to the primary purpose of "conservation and enhancement". The site would be visible from numerous points on covenanted land within the Tendring Hall Estate and therefore diminish the value of the covenants which were given to expressly prevent large scale development of this nature.

Night Landscape.

The National Trust believes the baseline assessment of the night-time impact of lighting and the assumption that there will be no impact on the surrounding area of the lighting are incorrect. There will be a great negative impact on the local nightscape from exterior site and security lighting, as well as the light spilling from the 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 damaging effect over rather more than the just the immediate locality.

Scale.

Although the applicant has submitted this application as a "Heritage and Conservation Centre" and stated that the retail element is "ancillary" there is a concern that the vast majority of the built development is devoted to retail and catering. Using the figures for internal areas provided in the application it would appear that only 22.7% of the floor area is linked to heritage interpretation. Such retail outlets should be confined to the edge of major towns as suggested in the Colchester Borough Local Plan 2004.

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

Tourism.

The present tourist honeypots in the Vale are centred around Flatford and Dedham.. Based on car counter figures Flatford currently receives approximately 200,000 visitors a year. On busy weekends and Bank Holidays both locations 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.

The proposal is being put forward by the applicant as a new major tourist attraction that will attract over 700,000 visitors. This is completely out of scale with the area. Far from diverting visitors away from the actual historic sites this proposal could bring well over half a million new visitors a year which would not only cause huge logistical problems for the area but also destroy the rural tranquility of the area. This is based on the fact that once the public have been given a taste of what Constable Country has to offer then it is very likely that they will wish to visit the actual sites of Constable's paintings. It is of great concern to The National Trust that the established tourist locations would not be able to cope with this great increase in the number of visitors.

Traffic.

“Horkesley Park” is planning to spend an initial £750,000 to promote the site, one of the stated reasons for the current location is the connection with Constable. There are several issues related to the scope of the Transport Assessment that should therefore be considered. The first issue relates to the obvious links between this development and the existing honey-pot areas at Flatford and Dedham as outlined in the Tourism section above. The potential for visiting Horkesley Park and Dedham/Flatford in one day are high considering they are promoting the same basic product and the “stay times” in each location are limited (stated average visit to Horkesley Park is under 3 hours). One of the obvious routes between the sites via the B1087 and B1068 or via C class roads through the parishes of Boxted and Langham. These routes are within the AONB, any potential increase in activity could therefore have an adverse impact on the area and should be investigated further. CBC Local Plan objectives state “To ensure that flows and volumes of traffic do not exceed the environmental carrying capacity of built-up areas or open countryside, especially in respect of the Dedham Vale Area of Outstanding Natural Beauty”. This issue was raised by CBC with the applicant at the scoping stage of the EIA, but has not been considered as part of the Environmental Statement.

The second issue related to the Transport Assessment is the assumption that all traffic will approach the site from the south along the A134. This seems somewhat unlikely and does not take into account of the potential impact that 700,000 visitors could have on the rural road network within the AONB. There is also no consideration of the relevant policies of Suffolk Council in relation the highway implications – the county boundary is less than 1km from the application site.

These issues leave a question about the potential wider negative impact of the development, especially related to the AONB. 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. This would certainly be true if a development of this scale were ever permitted.

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 of Constable and that landscape be 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 this proposal should be rejected as being completely out of scale, and of an inappropriate nature and location. It would also have the potential to irreparably damage the existing tourist locations within the Dedham Vale which the National Trust and partners have striven so long and hard to cherish.

Yours faithfully,

Keith Turner
Area Manager
Essex, Suffolk & Hertfordshire