

Suffolk Coast and Heaths Area of Outstanding Natural Beauty Boundary Variation project

Boundary Considerations

September 2017

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1.0 Introduction

1.1 Scope

1.1.1 This report sets out the approach used to define boundaries for the proposed boundary variations to the Suffolk Coast and Heaths Area of Outstanding Natural Beauty. It provides detailed boundary maps including a key map, a boundary section map, a boundary description and justifications for the boundaries chosen. Due to large file sizes, the maps have not been included with the text of the report, but have been made available separately via the Huddle file sharing site.

1.2 Format of the Report

- 1.2.1 The report is divided into three sections:
 - Section 1 provides an introduction to the report.
 - Section 2 outlines the method used to develop and define boundaries for statutory consultation.
 - Section 3 provides a boundary description and justifications for the proposed boundary variations. These should be read in conjunction with the detailed boundary maps, a boundary section map and a key map available via Huddle.

2.0 Method

2.1 Natural England Guidance on Assessing Landscapes for Designation

2.1.1 The boundary setting work was undertaken based on the Boundary Setting Considerations set out in Appendix 4 of the Natural England Guidance for Assessing Landscapes for Designation as National Park or AONB¹ (Attached as Appendix One below for convenience) and other principles set out within the body of the Guidance. It also took into account precedent set in landscape designation decisions by the Secretary of State and Planning Inspectors' reports regarding past landscape designation projects, where relevant. In addition, boundary mapping conventions applied by both Ordnance Survey² and by Natural England during past landscape designation projects, were also taken into consideration.

2.2 Approach

2.2.1 Evidence developed during the natural beauty assessment and desirability assessment was re-considered and issues identified in the natural beauty assessment as requiring further consideration during boundary setting were re-

Guidance for Assessing Landscapes for Designation as National Park or Area of Outstanding Natural Beauty in England, Natural England, March 2011.

² An Illustrated Guide to Boundary Making, Ordnance Survey, 1986.

- examined. Desk work and field work were undertaken and boundary options developed.
- 2.2.2 Information on development allocations from local plan documents, as well as information provided by relevant authorities on proposed housing and industrial developments, solar and wind farm developments as well as minerals and waste was reviewed and taken into account. Information in Conservation Area Management Plans and other specific initiatives which may be having an effect on the natural beauty of an area (eg HLF applications and coastal management planning) was also consulted. The considerable amount of data collected both in the GIS database and through a range of other sources during the natural beauty assessment phase of this project (such as the Heritage Gateway website and Google satellite imagery) was also used to inform decision making in relation to the proposed boundary. In particular, information on designations and other features of interest close to the proposed boundary lines, as well as information on landscape character were referred to. Finally consideration was also given to how the existing AONB boundary is drawn around estuaries and tributary valleys by way of context. Whilst the definition of the existing AONB boundary cannot be said to have followed current guidance, it was noted that where the edges of the plateau landscape form the upper lip of the estuary/valley, they are often included in the designation and boundaries sometimes extend as far as roads, but not always.
- 2.2.3 A range of draft boundary options were plotted on 1:2,500 OS base maps. Various boundary options were then considered in the field, with a focus on areas where particular issues had been highlighted during the natural beauty evaluation. Judgement was used as part of an iterative process which led to a preferred boundary line.
- 2.2.4 Where visual and/or physical access to the boundary line was possible, it was checked in the field. Where this was not possible, aerial and satellite photography was used to assist decision making. Many places in the Study Area were visited more than once.
- 2.2.5 Additional boundary considerations were used in conjunction with the Natural England Guidance where applicable (as noted in para 2.1.1 above) and include:
 - 1) Where the boundary follows a minor quiet rural lane or track which may be used for recreation it has been included and is usually mapped to the edge of the metalled highway. Where Rights of Way exist alongside a proposed boundary they are normally included. Where a boundary line follows a more major road it is excluded. Where boundaries follow a railway, they follow the railway property boundary fence and not the railway track itself. Embankments of road and railways are also excluded.
 - 2) Where rivers are in their latter stages and meandering/moving position as a result of natural process, the river itself is not used as a clear feature on the ground. Where the watercourse is small, such as a brook, it can be used as the boundary (this is the case for short stretches in the proposed Samford Valley boundary

- extension). There is a presumption in law that a boundary fixed to a watercourse changes with the natural and gradual changes in the position of the watercourse unless there is a sudden change of course due to flooding, in which case the boundary remains as originally determined.
- 3) The same presumption in law regarding features which move, also applies to the use of Mean High and Low Water as boundary features. These features vary over time and a boundary fixed to them will move with the natural and gradual changes in their position. For the purpose of mapping, the line chosen is that of MHW or MLW at the time that the boundary is drafted, though the boundary line will change as the position of the chosen feature moves. The Ordnance Survey boundary making convention is that when such features are used as boundary features, they should be marked 'for the time being' on each occasion that they are used in the boundary description, in order to denote the fact that the boundary line will change with future changes in the position of the feature. This convention has not been followed in the boundary descriptions for this project, as it was felt to make them difficult to follow in places. For clarity, the presumption that they will move with any future change in their position is stated here instead.
- 4) Features which are not classed as ground features (such as viaducts, flyovers, piers or overhead gantries) are not considered suitable for use as boundary features by Ordnance Survey. Where these coincide with the line of a proposed boundary, a straight line between two alternative ground features or an administrative boundary should be used to determine the boundary line instead.
- 5) Where no clear features exist on the ground, (for example where a boundary crosses an estuary or a road), it is acceptable to draw a boundary in a straight line from point to point where the end points are clearly identifiable features on the ground.
- 2.2.6 The initial proposed boundaries were tested through an informal consultation of the Technical Advisory Group, local authorities, parish councils, members of the SC&H AONB Partnership and local members of the CLA between July and September 2016. In relation to the initial boundary proposed, some respondents proposed the inclusion of additional land within the boundary variations, others the removal of land. Some wished to see a less convoluted boundary line in places, or one which used more robust features on the ground; while others questioned whether land should be included within the Dedham Vale AONB rather than the Suffolk Coast and Heaths AONB (the former lies in close proximity); and some queried the impact of existing development allocations on the proposed boundary. Some respondents preferred to await sight of the detailed evidence base for the proposals before making any comments. The responses received were considered and as a result, several minor changes were made to the proposed boundaries, both to include and to remove small areas of land. Some of these are outlined further in the Justification Tables below.

3.0 Boundary Setting

3.1 Rationale

- 3.1.1 This section addresses the boundary rationale for variations to the Suffolk coast and Heaths Area of Outstanding Natural Beauty. In all, three boundary extensions are proposed:
 - 1) to include the Stour estuary and valley slopes to the north and south of the estuary, which together, are contiguous with the existing AONB;
 - 2) to include land along the Samford valley which is contiguous with the existing AONB; and
 - 3) to include land along the Freston Brook which is contiguous with the existing AONB.
- 3.1.2 A number of specific issues have arisen in defining a boundary for the proposed AONB extension and the principles governing the approach adopted are set out here for clarity:
 - Transitional landscapes occur repeatedly throughout this landscape between the river valleys / estuary slopes and the wider plateau landscape beyond. Here, there is a gradual change in character and quality of the landscape. In line with the conclusions of the desirability assessment, when defining a boundary in these locations care has been taken to draw the boundary conservatively within the transition, taking account of visual associations between the transitional area and land that clearly merits inclusion as well as the inclusion of features on the edge. Often a pragmatic decision needed to be reached in finding a clearly distinguishable line on the ground.
 - In some instances the careful consideration of transitional landscape results in the definition of a convoluted boundary. Where this occurred the boundary was reviewed to determine if there were any appropriate alternatives and a professional judgement reached.
 - Where properties on the edge of the boundary are associated with a wider settlement and can be excluded they have been. Where isolated properties occur on the edge, and form part of a sweep of landscape, or have historic interest, or where it is difficult to draw a boundary line to exclude them, they have been included.
- 3.1.3 Justification Tables have been prepared in relation to each proposed boundary extension. The tables describe the proposed boundary variations and appear in the order shown above. The boundary Justification Tables should be read in association with the boundary maps (Maps 1, 2 and 3, and associated Key Map). Owing to file size, the maps could not be included within this document, so for the Natural England Board papers, they have been uploaded as separate attachments to the Defra Huddle file sharing site. The overall extent covered by the proposed boundary variations and the layout of the individual boundary maps can be found on the Key

Map. The relevant map reference numbers can be found at the start of each Justification Table. In addition, **Map 4** divides the proposed boundary into numbered sections, Sections One to Ten, which are then referenced within the Justification Tables. This map breaks the boundary up into more manageable lengths for the purpose of description and shows where each section of boundary starts and finishes.

- 3.1.4 Each Justification Table starts with a description of the proposed boundary line. The description for each of the three boundary extensions proceeds in an anti-clockwise direction from the point at which the proposed boundary departs from the existing AONB boundary, to the point at which it re-joins it. To improve the legibility of the tables, the word 'proposed' has been omitted from the text in the Justification Tables other than in the titles. All mentions of 'the boundary' in the tables should be read as 'the proposed boundary' at this stage.
- 3.1.5 The description of the proposed boundary is followed by a discussion of how any issues identified in the natural beauty Evaluation Tables have been addressed.
 Comments are then provided on how the Boundary Setting Considerations set out in the Guidance and elsewhere have been applied.

3.2 Boundary Justification Table One: Proposed Boundary Extension of the Suffolk Coast and Heaths Area of Outstanding Natural Beauty to the South of the Existing AONB

Proposed Boundary Extension of the Suffolk Coast and Heaths Area of Outstanding Natural Beauty to the South of the Existing AONB (Maps 1 and 2)

Section One (on Map 4): From Existing AONB boundary at Cattawade Foreshore to the Walls Road (for detail see Map 1).

Boundary Description:

The boundary variation leaves the existing SC&H AONB boundary at Ordnance Survey Grid Reference TM110330. It runs southwest along the Mean High Water Mark (MHW) at the base of the railway embankment until it reaches the sea wall protecting the chemical works site. It then follows the sea wall, then MHW around the edge of the Brantham chemical works site to the tip of the peninsula at TM 107322. It crosses the estuary from the tip of the peninsula in a straight line, to the point at which the sea wall on the south side of the estuary turns sharply southwards at TM 107319. It continues south, then east along the sea wall to its end at TM108319.

Boundary Considerations:

Issues Influencing the Boundary Line

A boundary was sought which provided an appropriate join with the existing AONB, the boundary of which currently follows MHW and then continues north along the railway line. In order to include the estuary, the boundary continues along MHW until it reaches the sea wall and then heads south-east.

During the informal consultation on the draft boundary, concerns were raised regarding the exclusion of the head of the estuary from the extension. The evaluation of the area was revisited and key issues influencing the boundary line were considered in detail. These included the transition in natural beauty at the head of the estuary as a result of adjacent development, the presence of a range of incongruous features, the narrowing of the waterway and the increasingly restricted views of the wider estuary towards its head due to the peninsula of reclaimed land to the north. Consideration was also given to recent planning approvals for development within the Brantham Regeneration Area, including for a large train depot in close proximity. It was concluded that drawing the boundary line across the estuary along the line of the railway or further west would include areas at the lower quality end of the transition in natural beauty and a more conservative line was thus sought further east, in accordance with Natural England Guidance. In addition, railway viaducts are not considered to be ground features so the viaduct would not in any case have been an appropriate feature for the boundary to follow. The issue of how best to cross the estuary in cases where there was no clear line for the boundary to follow was considered. Reference was made to other AONB boundaries in estuary contexts, which confirmed that where these situations arise, the AONB boundary crosses the waterway along a conservative boundary, either along a suitable administration feature or in a straight line between two clearly identifiable features on the ground, to exclude areas of lower quality. Examples of this approach include: the head of the Orwell Estuary, the Fowey Estuary in the Cornwall AONB and the head and mouth of the Dart Estuary in the South Devon AONB. In this instance therefore, a straight line boundary between the tip of the peninsula and the right angled corner of the sea wall on the south shore was chosen which excludes the lower quality area of the estuary.

Easily Distinguished Features

The boundary follows MHW and sea defence structures in the form of sheet piling along the peninsula and sea wall and piling on the south side of the shore. It does not follow any feature where it crosses the estuary but it crosses in a straight line between two easily distinguishable points, along a line which excludes the majority of the engineered shoreline around the head of the estuary.

Administrative Boundaries

The county boundary between Suffolk and Essex runs along the centre of Norman's Reach and then Middlebridge Creek as it approaches the head of the estuary. This would not have formed a sensible boundary for the AONB, as it would split the estuary down the middle and would not reflect the transition in natural beauty in this area. No administrative boundaries were utilised for the boundary in this stretch.

Settlements

The boundary line enables Brantham, Cattawade and Manningtree to be excluded, as determined in the evaluation.

Development

The boundary lies adjacent to the Brantham Regeneration Area, an area with approved planning applications for mixed use development and a train depot. These developments are located north of the railway line and no development is currently proposed further the south on the peninsula (which extends into the estuary and is currently derelict, comprising rough ground and scrub). There is a lack of certainty regarding the long term aspirations for the peninsula landscape to be managed for wildlife and to have improved access. Furthermore, the proposed developments north of the railway will increase the level of visible industrial development around the head of the estuary (as confirmed in the landscape and visual assessments accompanying the applications). On this basis it was concluded that the head of the estuary should be excluded from the boundary. The boundary therefore follows MHW along the eastern side of the peninsula as far as its southern tip, excluding areas further west.

Features of Interest

The Stour Site of Special Scientific Interest (SSSI), Ramsar and Special Protection Area (SPA) cover the whole estuary in this area, including north of the railway viaduct, stopping at

the floodgate near the A137. The boundary thus excludes part of this designation. This is not unusual where natural heritage designations cover significant areas. The natural beauty of the landscape for inclusion in the AONB designation is the primary consideration and in this part of the estuary, the natural beauty is in transition and is undermined by adjacent development and fragmentation.

Section Two (on Map 4): The Walls road to New Mistley (for detail see Map 1)

Boundary Description:

The boundary follows the road known as The Walls (B1352), continuing along the northern edge of the road to TM 116319. The boundary then joins and continues along the high security boundary fence around the Mistley Quay buildings, to include the Mistley Towers Scheduled Monument within the proposed SC&H AONB boundary extension and then continues along the property fence between Portishead House and the Mistley Quay buildings to the sea wall at TM 115320. It then follows the sea wall eastwards along Mistley Quay and Baltic Wharf to its end at TM 122318. Here it turns inland along a property boundary, then follows the south side of an access track at Mistley Marina, running eastwards, then turning south-westwards to the railway bridge at TM 122317, where it follows the railway property fence eastwards on the north side of the railway.

Boundary Considerations:

Issues Influencing the Boundary Line

The key issue in this area identified during natural beauty evaluation was the fragmentation of qualifying land to the south of the railway from the wider estuary by an area of land which is not regarded as meeting the natural beauty criterion. This was considered in detail in the evaluation stage and again subsequently in the desirability stage, specifically in relation to whether the mechanisms, powers and duties of designation should apply to this area and whether the application of 'wash-over' to the non-qualifying land was justifiable. It was concluded, based on available information and a review of the evaluation, that it was not desirable to include this area within the proposed AONB boundary extension. A boundary to the north of Mistley Place Park therefore needed to be identified. As a result, issues identified as requiring further consideration at boundary setting, relating to the transitional nature of the landscape in the south of this area and effects of development on the edges of this area, no longer needed to be considered.

Consideration was also given to the influence of incongruous features to the south of the Walls and the effect this might have on defining a boundary along the foreshore. It was concluded that effects were localised, boundary vegetation and trees along the Walls helping to minimise effects such that they were not regarded as significant. At the foreshore, despite traffic noise along the Walls, the focus of interest is the wider estuary landscape and on this basis a boundary close to the foreshore was sought.

In the area around Mistley Towers and south of Mistley Quay there were issues in identifying a clearly distinguishable feature for the boundary to follow. The boundary chosen sought to

include features of interest at the margin whilst also identifying clear features on the ground.

Easily Distinguished Features

The edge of the metalled road at the Walls is a clear feature on the ground. The boundary around Mistley Towers and between Mistley Marina and the railway is more complex following property fences and access tracks.

Administrative Boundaries

No administrative boundaries are used as boundary features along this section of boundary.

Settlements

The boundary line enables the settlement of Mistley to be excluded, as determined in the evaluation. The property adjacent to Mistley Towers was included on the basis it related closely to the water's edge and is separate from the wider settlement.

Development

There are no development allocations adjacent to the boundary in this section. Planning applications in the area between Manningtree and Mistley have not been considered further due to the exclusion of the former Mistley Park following the desirability assessment and conclusion not to apply 'wash-over'.

Features of Interest

The boundary line includes the natural shoreline north of The Walls. Whilst this foreshore lies close to the busy road and animal sanctuary to the south, its focus is northwards across the mudflats, marshes, and open water with wide views across to the AONB on the north side of the estuary. Further east, the boundary also included the wooded lower slopes of the estuary valley sides where they create a distinctive wooded setting immediately adjacent to the water e.g. land east of Baltic Wharf. These wooded slopes are also clearly visible in views from the north side of the estuary and read in the context of an apparently undeveloped backdrop to the water.

Mistley Towers is a Scheduled Monument and is included in the boundary extension in its entirety. This feature sits on the edge of the estuary, is closely related to the water and is a local landmark. It is acknowledged that it also forms part of Mistley Conservation Area; however it was not possible to include the Conservation Area as a whole within the boundary extension as this would have resulted in the splitting of the settlement and would have required the inclusion of non-qualifying land.

Section Three (on Map 4): New Mistley to Wrabness (for detail see Map 1)

Boundary Description:

At TM 128 317 the boundary crosses the railway in a straight line and follows a field boundary hedge southwards to TM 128314 where it turns east along a field boundary at

Home Farm, to TM 129314. Here it turns south along a discontinuous field boundary to the B1352 road at TM 129313. It crosses the road in a straight line and follows the east side of Heath Road south to TM 128312, where it turns east following a property boundary, then south following the rear of property boundaries to TM 129310. Here it turns west along a property boundary back to Heath Road. It continues south along Heath Road for a short distance to TM 128 309, where it re-joins a property boundary running east then south to where it meets the Essex Way at TM129309. The boundary follows the bridleway along the Essex Way eastwards towards Bradfield. At TM 139306 it joins the minor road known as Mill Lane, following the north side of the road to TM141306. Here it leaves the road and follows the boundary hedge around (and excluding) a cemetery and then along the rear of property boundaries to TM 142307, where it continues northwards then east along a field boundary hedge until it reaches the B1352 at TM 143308. It follows the road north-west to TM 142310, where it crosses the road in a straight line and follows a property boundary north, then south-east around (and excluding) the property known as Stour Cottage, to Shore Lane. It crosses Shore Lane and follows the rear property boundaries around the village of Bradfield to the property known as Bradfield End, where it re-joins the B1357 road at TM 146308. It continues generally south-east along the northern side of the B1357 road to Cooks Corner at TM 174307. At Cook's Corner it leaves the B1352, continuing north along the west side of Station Road to TM 177314. Here it turns north along the west side of the railway bridge and then crosses Church Road in a straight line, in line with the railway property fence.

Boundary Considerations:

Issues Influencing the Boundary Line

Key considerations influencing the boundary line in this stretch related to the need to balance the inclusion of the qualifying land along the estuary and surrounding slopes, consideration of visual associations across the estuary and the need to find a clear boundary line in an area without many clear ground features. These issues were notable in areas of transition or where fragmentation of the landscape pattern had occurred. West of Bradfield, consideration was given to taking the boundary further south to rear property boundaries along Mill Lane, as far as Windmill Road. However this would have resulted in a convoluted boundary in an area with few continuous boundary features. In this instance, the route of the Essex Way long distance path was considered to be a suitable boundary line. The footpath is well used, clearly marked on maps and evident on the ground.

In the area west of Jacques Farm, fragmentation of the structure of the landscape as a result of field boundary loss resulting in areas of lesser quality landscape was an issue. However, the upper slopes of the estuary valley sides still express a strong connection to the estuary and offer scenic views across open water and also along the undulating valley sides dissected by stream valleys. These issues become problematic where there is a lack of features on the ground that could be used as a boundary. In the area between Bradfield and Jacques Farm, consideration was given to using the railway line as a suitable boundary feature to exclude areas of lower quality; however this would have resulted in the exclusion of higher valley slopes near the plateau which afford views across the estuary and along the undulating valley sides. In addition, the valley slopes above the railway are highly visible from the north shore of the estuary as part of the sweep of green, undeveloped shore line and backing slopes. The only other suitable potential boundary feature was the B1352 road,

which would enable the upper estuary slopes to be included but would bring in areas of valley slopes where natural beauty is lower and fragmented and discrete areas where the railway embankment visually and physically severs connectivity to the estuary. This has been a finely balanced decision, but overall the use of the B1352 was preferred and is consistent with the definition of the existing AONB boundary around other estuary landscapes where similar issues occur.

Easily Distinguished Features

Much of the boundary in this section follows the B1352. Elsewhere field boundaries, property boundaries and the Essex Way bridleway have been used. In a few places the boundary has had to follow discontinuous field boundaries for short stretches between New Mistley and Mistley Heath. This type of boundary is only adopted when there are no other features to follow in the vicinity and where the boundary follows the less clearly defined feature for a short length only, which is the case in these instances.

Administrative Boundaries

No administrative boundaries are used as boundary features along this section of boundary.

Settlements

Bradfield village has been excluded as recommended in the evaluation and a boundary line drawn accordingly around property boundaries, keeping it tight to the settlement boundary where feasible. Stour Lodge and Elmsworth House have been included within the boundary extension as they sit within a wider sweep of qualifying land and lie beyond the settlement boundary. Bradfield End has been excluded as it relates more closely to the settlement and is not within a wider sweep of qualifying land, despite also being beyond the settlement boundary.

Development

An application for housing development on land north of Stourview Avenue at New Mistley has been approved (November 2016). The Tendring District Local Plan Publications Draft June 2017 has amended the settlement boundary to accommodate this site. This area of land has thus been excluded from the boundary extension.

There have been a number of recent development applications in the vicinity of the boundary at Bradfield. Currently none has been allocated (two have been refused and a third was awaiting determination at the time of writing) and on this basis they have not required an alteration to the boundary.

In drawing the boundary line along the B1352, a recently constructed single agricultural barn adjacent to the road between Bradfield and Jacques Farm, has been included as it was not possible to find a clear line on the ground which excluded it.

Features of Interest

The boundary includes the following features of interest on the edge:

- The site of Old St Mary's Church (Scheduled Monument)
- Narrow tributary stream valleys where they penetrate the valley sides creating topographic variation and contrasting smaller scale wooded character.
- Ancient woodland at Millgrove Wood and Brakey Grove

Consideration was given to the inclusion of Bradfield Conservation Area which lies on the edge of the boundary and includes the listed church and other buildings, however this would have required the splitting of the settlement and therefore the boundary adopted follows the outer edge of the settlement.

Consideration was also given to the inclusion of a pill box south of the B1352 which is a Scheduled Monument and has commanding views over the estuary. However due to the transitional nature of the landscape onto the plateau and the need to find a clearly identifiable line it was concluded that the road formed the most suitable boundary and that this feature should be excluded from the boundary extension.

Section Four (on Map 4): Wrabness to the east end of Copperas Wood (for detail see Map 2)

Boundary Description:

After crossing the railway bridge, the boundary follows the railway property fence running along the north side of the railway. It continues along the railway property fence. At TM181315 it turns north-east, then east at TM 181316, around a property boundary, crosses Black Boy Lane in a straight line and follows the east side of the lane north-eastwards to TM182317, where it turns south-east along a fence between stables and a paddock. At TM 182317 it turns south and follows a field boundary back to the railway property fence. It continues east along the railway property fence to TM 184315 where it crosses the railway along the east side of a railway bridge, then follows the garden boundary around Old Rectory House to TM 183312. Here it crosses a track and turns east following the south side of the track to TM 186311, where it follows the woodland boundary south-westwards around the edge of Stour Wood to join the B1352 at TM 183308.

It then follows the north side of the road to TM 195310 where it turns north, then east, then north, following the boundary of Stour Wood, to the railway property fence at TM194315. It turns east along a fence on the south side of a path running alongside the railway property fence to TM 198316, where it joins and continues along the boundary of Copperas Wood south-eastwards to a track at TM 199314. It crosses the track in a straight line and continues generally eastwards along the winding woodland boundary of Copperas Wood, to a track at TM 203314. The boundary follows the west side of the track north-eastwards to TM 204314 where it cuts across the track in a straight line and follows the woodland boundary until it reaches the railway property fence at TM 209316. It crosses the railway line in a straight line and continues eastwards along the railway property fence on the north side of the railway line to TM 220316, where it turns north along a short spur of railway fence, to its end at TM

220317.

Boundary Considerations:

Issues Influencing the Boundary Line

Key issues in this area have included the boundary line around Wrabness settlement and the consideration of fields adjacent to the settlement which extend onto the plateau landscape. The field immediately to the south of the railway, east of the station, is surrounded on three sides by development and separated from the wider extension by the railway. Its flat topography means that it feels disconnected from the Stour Estuary. For these reasons this area was not included in the boundary extension.

Similar consideration was given to the fields behind properties further along Wrabness Road, east of Stour Wood. These fields form part of the estuary slopes, however they lack distinction and are not widely visible due to Copperas Wood and mature trees alongside the railway and their inclusion would require the boundary to follow property boundaries, some of which are not continuous. On this basis it was concluded that the boundary should adopt the fence adjacent to the path alongside the railway property boundary as the boundary line. This is a clear feature on the ground.

Easily Distinguished Features

In this section the boundary follows the railway property fence, tracks, the edge of woodland, and the edge of the B1352. There are a few minor sections where the boundary follows continuous property boundaries around Wrabness. When using a woodland boundary, care was taken to ensure the existing woodland edge concurred with that on Ordnance Survey maps.

Administrative Boundaries

No administrative boundaries are used as boundary features along this section of boundary.

Settlements

Wrabness village has been excluded in its entirety, including several houses north of the railway and Old Rectory House which lie outwith the village settlement boundary. These dwellings have been excluded as they relate closely to the settlement and a suitable boundary which excludes them can be identified.

Development

There are no proposed or existing allocations for development in this section.

Features of Interest

The Local Wildlife Site at Wrabness Siding lies on the edge of the proposed extension between the railway and Station Road. It has been excluded from the boundary extension as it makes little contribution to the natural beauty of the area and a clear boundary fence along the northern side of the railway line formed a robust boundary feature.

The ancient semi-natural woodlands at Stour and Copperas Woods (SSSI, local wildlife site and RSPB Reserve) lie at the edge of the boundary but are included in their entirety, despite the fact they continue onto the plateau landscape to the south. They are included because they are important features of interest at the margins of the boundary extension and have a coherence and unity.

A House for Essex is a highly distinctive modern folly built as a holiday cottage, with an unusual roofline and vibrant colours and designed by renowned artist Grayson Perry, which sits in a prominent position just below the village of Wrabness. It lies outside the settlement boundary on the valley slopes above East Grove Woods and is visible over a wide area; and has been included as a feature of interest on the margin.

<u>Section Five (on Map 4): East End of Copperas Wood across the estuary to Shotley Gate (for detail see Map 2)</u>

Boundary Description:

At the end of the fence it cuts across to the Mean High Water Mark (MHW). It continues along MHW to the start of the sea wall at TM 228326. It follows the sea wall / MHW to the edge of the deep water berth at TM 229326, where it turns westwards following the Mean Low Water Mark (MLW).

At TM 214324 the boundary leaves MLW and crosses the estuary in a straight line along the County Constituency Boundary to TM 213330, off Erwarton Ness. On reaching the point where the County Constituency Boundary and MLW coincide, it follows MLW eastwards to TM 245334. Here it follows the SSSI boundary northwards, in line with the west side of a Pier, to the sea wall at TM 246335. It follows the sea wall along the shore north-westwards to TM 244336, where it cuts across inland in a straight line, to follow a property boundary north-eastwards, then a path north-westwards to a road at TM 244337. It continues along the south side of the road, north-westwards, to its end at TM 240339 where it cuts across in a straight line to a property boundary wall which it follows west for a short distance to TM 239339, where it re-joins the existing SC&H AONB boundary.

Boundary Considerations:

Issues Influencing the Boundary Line

A key issue in this area was the identification of a suitable feature for the boundary to follow immediately to the west of Carless Refinery. Here recent sea defences in the form of a gravel embankment have been constructed, although by their nature these features are not static in form. Alternatively the railway line could be used or MHW from the end of the railway property fence to the jetty in the north. On balance it was concluded that MHW provided the best boundary, excluding the sea defences.

Another issue included the best approach to defining a boundary line across the estuary which would enable the exclusion of the parts of the estuary which are most affected by port activity, as noted in the evaluation. Reference was made to other AONB boundaries where similar circumstances arise. In these circumstances, administrative boundaries which cross

estuaries along a suitable line have regularly been used as boundary features where no feature exists on the ground, as have point to point straight lines. In this case, since there are suitable administrative features which would enable the lower quality areas to be excluded, they have been followed, including use of MLW and the County Constituency boundary.

At Shotley Gate, issues to do with recent sea defence construction and the approval of new kiosks at Shotley Pier have been taken into account (see development section below).

Easily Distinguished Features

The boundary in this section follows MHW and MLW for significant lengths where there are no other suitable ground features to follow; and the County Constituency Boundary when crossing the estuary. Elsewhere it follows the line of a SSSI boundary, sea defences, a short stretch of footpath and the edge of a road.

Administrative Boundaries

There are no ground features which can be mapped to across the estuary, however there are suitable administrative boundary features in this area (MLW and the County Constituency Boundary) and therefore these have been used in preference to a straight line boundary between two clearly identifiable features. This is consistent with other designation boundaries which cross estuaries e.g. the mouth of the Orwell in the SC&H AONB. By bringing the boundary back to this line, the area most affected by port activity and development close to Felixstowe and Harwich is excluded.

Settlements

The boundary excludes Ramsey and Harwich in accordance with the findings of the evaluation. The industrial area at Parkeston Quay is excluded; however the boundary does overlap slightly with the settlement boundary as drawn in the Tendring District Local Plan Publications Draft (June 2017) in a small area where it extends into the estuary intertidal zone. In order to ensure a boundary which is consistent with other designations in this area (eg SSSI), the proposed AONB boundary crosses the settlement boundary to include the small area of foreshore and an area of estuary between high and low water marks, including the first gantry/pipeline, as far as the second gantry where it abuts the MLW on the shore.

The settlement of Shotley Gate is excluded from the designation in line with the findings of the evaluation.

Development

The boundary excludes the areas shown as Employment Sites at the refinery in Tendring District Local Plan Publications Draft June 2017. There are no additional allocations affecting the area.

An approved development for two kiosks at the head of the Pier at Shotley has been considered in terms of implications for the boundary. The approved scheme results in an alteration to the width of the pier close to the shore. Piers are not considered to be ground features, since they are raised above sea and ground level, so they are treated the same

way as gantries and flyovers as not being suitable for use as a boundary feature. Thus, in accordance with boundary setting convention, and also due to the changes which will occur as a result of the proposed development, the pier has not been used as a boundary feature. In the absence of other suitable features, the administrative boundary of the SSSI was preferred.

At Shotley Gate, the boundary follows MHW westwards. In this area new gabion sea defences have been constructed. They form two tiers to reduce perceived height, include rock type to visually complement the adjacent cliffs and incorporate the coastal footpath. On this basis they are included within the boundary.

Features of Interest

The area included within the boundary includes the majority of the Stour Estuary mudflats and marshes and open water which is designated SSSI, SPA and Ramsar. However the boundary line excludes a small area of these designations adjacent to Carless Refinery where a relatively recent sea defence embankment has altered the character of the foreshore in this area. The boundary also excludes part of these designations by excluding the outlier of Bathside Bay which lies further east, in accordance with the evaluation. A pillbox which lies, now partially buried, in the sea defence bank adjacent to Carless Refinery was also excluded from the boundary.

The steeply sloping area of Shotley Cliff, which supports pleasing deciduous woodland, is a distinctive geological feature and is highly visible in views from the south side of the estuary. This area has thus been included in the boundary extension and lies outside of the settlement boundary.

The Shotley Conservation Area and the Scheduled Monuments at Shotley Battery and the Martello Towers lie outside the area included within the boundary. They are separated from it by land which does not meet the criterion for designation within the settlement of Shotley Gate.

3.3 Boundary Justification Table Two: Proposed Boundary Extension of the Suffolk Coast and Heaths Area of Outstanding Natural Beauty along the Samford Valley

Proposed Boundary Extension of the Suffolk Coast and Heaths Area of Outstanding Natural Beauty along the Samford Valley (Map 1)

Section Six (on Map 4): from existing SC&H AONB boundary at Lewis Lane, near Stutton, to the railway near Coppey Farm (for detail see Map 1)

Boundary Description:

The boundary leaves the existing SC&H AONB boundary at TM 141346, crossing the B1080 in a straight line and following the east side of Lewis Lane, then a track around and excluding Sunny Bank to TM 137350. It then follows a field boundary hedge east to TM 139350, then continues generally north around a woodland boundary to a track at TM 139353. It turns north-east along the south side of the track to TM 140354; then continues north-west along the west side of Holly Lane to its junction with Bentley Lane at TM 139355. It follows the west side of Bentley Lane to its junction with Stutton Lane at TM 138359 and continues along the south side of Stutton Lane to its junction with the A137 at TM 127360. It follows the east side of the A137 south to TM 126358 where it crosses the road in a straight line, in line with the south side of the track towards Folly Farm, which it then follows. At TM 125358 it follows a field boundary south, then west, then north around and excluding the farm buildings until it reaches a track around a cottage which it follows, excluding the cottage and continues along field boundaries generally west until it reaches and crosses a track at TM 120359. It continues west along the track crossing the dam of a small artificial pond on the northern tributary stream of the Samford Valley, then along a field boundary to the railway line, which it crosses in a straight line along a track at TM 119359.

Boundary Considerations:

Issues Influencing the Boundary Line

A boundary was sought which provided an appropriate join with the existing AONB boundary to the west of Stutton village. The existing AONB boundary follows the south side of the B1080 through Stutton village, splitting the settlement, with housing north of the road excluded from the AONB. On the north side of the road there is a clear change in landscape and scenic quality to the west of the settlement as the valley influence develops and the road dips down into it. The boundary chosen follows the settlement boundary along the east side of Lewis Lane, excluding the part of the settlement lying north of the road. The east side of the lane was preferred since part of the lane is a bridleway and in such cases the boundary setting convention is to include the lane.

A key consideration influencing the boundary line in the stretch between Holly Lane and the A137 related to the need to balance the inclusion of the qualifying higher quality land along the valley and its surrounding slopes, where possible up to the limit of the visual envelope of the valley, against the need to find a clear boundary line in an area without many clear

ground features. Here the preferred boundary north of Holly Farm follows the edges of Holly Lane, Bentley Lane, Stutton Lane and a short stretch of the A137. This boundary line was selected in order to allow the inclusion of the head of a small tributary valley and neighbouring attractive area of developing woodland and restored habitats adjacent to Furze Plantation (which are also visible from the lanes at the boundary) in an area with few other continuous, suitable mapped boundary features. This line also enabled the inclusion of an area of sloping farmland north of Wallers Farm which is clearly visible from the south side of the valley in the vicinity of the junction between the A137 and the B1080, though it is recognised that the northern part of this field is in transition to the neighbouring plateau.

Between the A137 and Coppey Farm, the key issues included the need to find an appropriate line for the boundary in the vicinity of Folly Farm, where there are few clear continuous features, and the need to exclude the northern tributary valley, in line with the findings of the evaluation that it does not meet the natural beauty criterion. Further consideration was also given to the impact of incongruous features in the vicinity of Brantham Bridge and the effect they might have on defining a boundary across the valley. It was concluded that the effects of the A137, railway and high voltage power cables were localised and their overall impact limited due to curves in the river valley in this area, as well as the tall screening vegetation. As a result, the preferred boundary line includes the full width of the main river valley, with a boundary line chosen across the northern tributary valley which maximises the inclusion of upper valley slopes adjacent to the confluence of the two valleys. These valley slopes are clearly visible from the south side of the main valley in this area, though it is recognised that landscape quality is in transition at the mouth of the northern valley.

Easily Distinguished Features

The boundary follows a range of features which are clearly visible on the ground, predominantly minor roads and the A137. It also follows short lengths of tracks and field and woodland boundaries. For a very short stretch it follows a property boundary to exclude the property. Near Brantham Bridge it crosses the dam of a small artificial pond, before following field boundaries to the railway, which it crosses along a track under the railway embankment.

Administrative Boundaries

No administrative boundaries are used as boundary features along this section of boundary.

Settlements

In line with modern boundary setting considerations, the northern part of the settlement of Stutton which lies on the edge of the plateau has been excluded from the proposed extension, with the boundary following the line of the settlement boundary north, excluding the housing alongside Lewis Lane.

The small hamlet of Bentley Junction lies within the northern tributary valley, just to the north of the boundary line and in accordance with the findings of the natural beauty evaluation, has been excluded from the boundary, along with this valley.

Development

There are no development site allocations affecting this section of the boundary. Folly Farm Quarry, which lies adjacent to the boundary line, is an active sand and gravel quarry and minerals and waste re-cycling site, with a long history of planning applications. There is an extant permission for the extraction of sand and gravel and the site permits extend to 2029 with restoration due by 2030. The most recent development applications relate to the development of a fire lagoon. The actively developed parts of the Folly Farm site have been excluded from the boundary, including the site for the proposed lagoon.

Features of Interest

The boundary chosen has allowed the inclusion of several areas of priority habitat including areas of good quality semi-improved grassland and broadleaved woodland which make a positive contribution alongside the boundary eg Holly Wood and Alder Carr and the area adjacent to Furze Plantation.

<u>Section Seven (on Map 4): from the railway near Coppey Farm to Cutlers Lane (for detail see Map 1)</u>

Boundary Description:

West of the railway line, the boundary continues south-west then north-west then south-west along a field boundary hedge, excluding Coppey Farm buildings to where it joins a track running south-east at TM 116358. It follows the east side of the track to TM 116358, where it continues north-west along the south side of a track to TM 114358. It then turns south, then west, along field boundaries excluding a farm building, then continues generally west along the south side of a track on the northern boundary of Little Charles New Plantation. It continues along the track to TM 112359, where it follows a field boundary south-west, then north-west to a track at TM 110358. It follows the west side of the track north, excluding Dodnash Priory Farm and an area of car parking, and at TM 111360 continues north-west then west along a woodland boundary to TM 109360. Here it continues north-west along the boundary of Dodnash Wood to where it meets a minor road at TM 108363. It continues west along the south side of the road to where it meets a minor road called Bentley Road at TM 105364.

It continues south-west along Bentley Road to where a track runs off it towards Dodnash Bungalow at TM 103361. Here it crosses the road in a straight line and follows a property boundary west, then north, around and excluding a riding stables to a track at TM 101363. It continues west along the south side of the track for a short distance and then generally north along the woodland boundary to the tip of Holly Wood, where it is crossed by a Right of Way at TM 104372.

It follows the footpath across the tip of Holly wood and then continues south-west along the western boundary of Holly Wood, including adjacent areas of recent tree planting to TM 099367, where it joins and follows the course of a stream southwest.

At TM 098366 it joins a field boundary hedge running north-west to TM096370 where it crosses in a straight line to a hedge running south-west to TM 096369. It cuts across a field edge to a track at TM096368, which it follows generally south-west to TM 093366, where it joins the field boundary hedge; continuing south-westwards to TM 092366, where it turns north-west along the field boundary bank to TM089366. Here it cuts across in a straight line to a hedge running north-west to TM 088367, then follows the south side of a track running south-west to Hill Farm. From Hill Farm it continues generally north-west along field hedge boundaries to TM 083368, where it turns south-west, north-west and south-west again along field boundaries to where it joins a drain at TM 082367. It continues along the south side of the drain to the Stutton Brook. It follows the brook south for a short distance to where it meets a field boundary on the west side of the brook, which it then follows south-east to TM 083363. Here it follows the field boundary generally south-west to the minor road called Cutlers Lane at TM 078362.

Boundary Considerations:

Issues Influencing the Boundary Line

The main consideration influencing the boundary line in this section was the need to balance the requirement to include the qualifying higher quality land and woodland along the valley and its surrounding slopes whilst excluding the neighbouring lower quality, non-qualifying plateau, against the need to find a clear boundary line along the rim of the valley, in an area with few continuous clear ground features in several stretches. These issues were considered further during the desirability assessment and it was concluded that in line with the Natural England Guidance, a conservative boundary should be sought which includes the higher quality area and excludes lower quality land on the margins of the qualifying area, even though this would result in a relatively complex boundary.

Following the informal consultation, consideration was given to taking the boundary further north to the minor road running from Coppey Farm to Dodnash Wood at Hazel Shrub. Whilst this would have resulted in a less convoluted, more pragmatic boundary, it would have included an area of typical flat plateau farmland with no visual links to the Samford valley due to the almost continuous woodland edge which runs along the valley rim, hiding the area to the north from the Samford valley (apart from a small area in the vicinity of Coppey Farm). The evaluation concluded that the parcel of land which would need to be included in order to use the road as the boundary did not meet the natural beauty criterion and it was not included within the Candidate Area.

On balance, and in line with Natural England Guidance, a more conservative boundary line was preferred. This includes the areas of high quality land with valley characteristics and/or a strong visual association with the tributary valleys; and excludes areas of lesser quality. It also excludes an area of development around Dodnash Priory Farm. The boundary line chosen principally follows the visual envelope of the Samford Valley Character Area, extending to the outside edge of woodlands which straddle the valley rim and continue onto the plateau, but not including land beyond the woods with no visual link to the valley system. These woods play an important role in framing the valley landscape and separating it from neighbouring plateau areas. There is a clear transition between the two Character Areas along the edge of the woods, with lower quality plateau land extending northwards. The

decision to choose a conservative boundary in line with Natural England Guidance has resulted in a convoluted boundary in places, but a more pragmatic one would have entailed bringing in land which evaluation concluded did not meet the natural beauty criterion.

Following the informal consultation the initial proposed draft boundary from the tip of Holly Wood to Cutlers Lane was reconsidered and amended. The initial boundary had excluded some land with strong tributary valley morphology, high levels of scenic quality and some areas with strong visual associations with the tributary valley system. The boundary now includes an area of recent woodland planting contiguous with Holly Wood but not yet shown on OS Explorer maps. It also includes some of the steeply sloping fields immediately adjacent to the woodland edge which have high levels of natural beauty, but excludes some areas with tributary valley character south of Bluegate Lane due to the lack of suitable boundary features to follow on the ground in this area. The boundary has not been taken as far north as Boynton Hall. Whilst this historic house and the other thatched cottages along the Old London Road are features of interest on the margins of the area, they are separated from the higher quality area by a strip of lower quality farmland which was excluded from the Candidate Area. The preferred boundary in this stretch includes the higher quality, steeper areas of valley landform, though this has entailed the use of non-continuous features for short stretches in a few places, owing to the lack of continuous features to follow and is more complex than the initial boundary proposed during the informal consultation.

In the west, adjacent to the A12, the boundary was drawn back slightly from the edge of the road owing to the localised effect of the A12 on tranquillity and a lack of obvious continuous features to follow that would have enabled the inclusion of an area of fen priority habitat which lies adjacent to, but outside the boundary. Following the informal consultation, the boundary was re-considered in this area following suggestions that land too close to the A12 had been included and that the boundary should be drawn back still further away from the A12. It was concluded that the area within the boundary qualifies for inclusion as it is part of the sweep of small valley pastures which typify this proposed extension, providing priority woodland, meadow and good quality grassland habitat for a range of wildlife. Whilst there is some road noise from the A12 in this area, it is not overwhelming owing to the mature trees in the wooded area nearer to the road which has been excluded. The impact of the well-screened road on tranquillity in this area was not deemed sufficient to preclude the inclusion of land which otherwise meets the designation criterion, apart from in close proximity.

Easily Distinguished Features

This complex stretch of boundary makes use of a relatively wide range of features in order to exclude lower quality land around the rim of the valley system, following field boundaries, tracks, minor roads and woodland boundaries. For short stretches it also follows property boundaries, a Right of Way, a short stretch of drain and two stretches of brook. In three places it cuts across between two clear ground features in a straight line, where no feature exists on the ground. All the features used are easy to identify on the ground.

Administrative Boundaries

No administrative boundaries have been used as boundary features in this section.

Settlements

There are no settlements included within the boundary line along this section. Several areas of plateau land bordering the valley system containing small concentrations of dispersed properties eg along the Old London Road, south of Bentley village near Dodnash Wood and along the lane at Hazel Shrub have been excluded.

Development

There are no known development allocations which affect this stretch of boundary. There have however been many planning applications in the vicinity of Dodnash Priory Farm, which has seen a range of developments. The applications reviewed did not result in a change to the boundary in this area.

Features of Interest

The preferred boundary line includes the extensive areas of ancient and semi-natural woodland which play an important role in framing the valley system along the rim of this section of the river valley. The boundary also includes an area of floodplain grazing marsh and good quality semi-improved grassland near the A12, but excludes an area of fen which lies in close proximity to the A12.

<u>Section Eight (on Map 4): from Cutlers Lane to the A137 at Brantham (for detail</u> see Map 1)

Boundary Description:

The boundary follows the east side of Cutlers Lane generally south-east to TM 083357 opposite Rookery Farm where it follows the south side of a track east to TM 085357, then continues south along field boundary hedges to TM 085354. Here it follows the south side of a track north-east to TM 085354, then follows a field boundary running south-east then north east to TM 087354, where it continues south-east along a field boundary hedge to a track at TM 089352. It continues north-east along the north side of the track to TM 091354 where it turns north-west along the west side of a track to TM 091355. It then follows a field boundary hedge north-east then south-east to TM 093354. It continues north-east then south-east around another field boundary to the edge of a small scrubby wood at TM 094354. It follows the woodland boundary north-east then south-east to a track adjacent to the Grange Caravan Park at TM 097354.

It crosses the track and continues north, then generally east along the property boundary hedge around and excluding The Grange Caravan Park to TM 098353, where it continues east along a field boundary to the Bentley Road at TM 100353. It follows the north side of the road for a short distance then crosses the road in a straight line, in line with a field boundary on the south side of the road, and continues south along this field boundary to Fisher's Lane at TM 100351. It follows the north side of this track west for a short distance to join East End Lane. It continues along the east side of East End Lane to TM 103348, where it follows a Right of Way from the road for a short distance to the boundary hedge of a play area at TM 103349.

It continues along the play area boundary hedge to TM 105348, where it continues northeast then east along a field boundary to TM 108350 where it turns south, cutting across in a straight line to the end of a field boundary hedge which it follows south-east to a track known as Gravel Pit Lane at TM 110349. It crosses the track in a straight line to follow a field boundary hedge running South to TM 111347, where it turns east along the north side of a track for a short distance, before crossing the track in line with a field boundary running due south, which it follows to TM 111346. It continues generally east along the rear of property boundaries to TM 114345, where it continues south along the west side of the track to the A137 at TM 114344.

Boundary Considerations:

Issues Influencing the Boundary Line

Following the informal consultation this stretch of boundary was reconsidered. A key issue in this area related to the need to find a suitable boundary in close proximity to the neighbouring Dedham Vale AONB. In line with the findings of the natural beauty assessment, it was concluded that a boundary which was contiguous with the Dedham Vale AONB was not suitable despite the similarities in the landscape that they share, due to the strip of non-qualifying land which lies between the Dedham Vale AONB and the Candidate Area. There is also a transition in natural beauty in this section, where the Samford valley character is progressively lost and the plateau character starts to dominate. Using the surrounding roads as boundary features in this area would have provided a simpler, more pragmatic boundary line; but would have included non-qualifying land beyond the Candidate Area. Since a suitable alternative boundary line could be drawn within the transition to exclude non-qualifying land on the plateau, (using suitable features which are clearly visible on the ground, largely hedges and tracks) the more conservative, though more complex boundary was preferred in this area. This enabled the exclusion of the lower quality plateau land on the margins of the area, between Rookery Farm and the Grange Caravan Park. Grange Caravan Park itself is well screened by vegetation from the Samford valley and has little effect on natural beauty in proximity, but has been excluded from the boundary.

Easily Distinguished Features

The relatively complex boundary largely follows a range of features which are clear on the ground, including stretches of minor roads and lanes, tracks, field boundaries, a woodland boundary, some rear property boundaries and a short stretch of a Right of Way. In two places there are short stretches where the boundary cuts across in a straight line between two features in order to cross a road and also where two field boundaries are not contiguous.

Administrative Boundaries

No administrative boundaries have been used as boundary features in this section.

Settlements

The settlements of East End and Brantham lie adjacent to this stretch of boundary and have been excluded. Around East End the boundary follows the tall hedge behind a play area which separates it from the village. At Brantham it follows the rear property boundaries which

form the northern settlement boundary of the village. In both cases, houses adjacent to the boundary do not have a significant visual impact, especially when viewed from the nearby Rights of Way, owing to screening vegetation. There was also little apparent impact on levels of tranquillity in these areas from the villages, which sit on the plateau and face away from the valley.

Development

There are no known development allocations which affect this stretch of boundary.

Features of Interest

At the junction of Cutlers Lane and Putticks Lane, the Grade II Listed Orchard House has been included within the boundary. The boundary also includes an area of upper valley slopes supporting mixed habitats, and includes prehistoric or Roman field boundaries which are visible as crop marks in dry weather, to the east of Gravel Pit Lane.

In addition the inclusion of a narrow stretch of tributary valley and associated upper valley slopes between Rookery Wood and north of Meadow Cottages has enabled the inclusion of an area of attractive river valley morphology and a non-designated but characterful wooden barn.

Section Nine (on Map 4): from the A137 at Brantham to the existing SC&H AONB boundary on the railway adjacent to Cattawade Works (for detail see Map 1).

Boundary Description:

The boundary turns east along the A137 on the north side of the metalled road to TM 115344, where it crosses the road in line with the rear property boundaries on the south side of the road and continues south-west along the rear property boundaries to TM 114343. It follows the boundary of Brantham Glebe north-west for a short distance to Church Lane, which it then follows, generally west to the junction with School Lane at TM 110 343. It continues along the south side of School Lane to the junction with the Ipswich Road at TM 107343 and follows the south side of the Ipswich Road to TM 106342. Here it turns southeast and continues generally south-eastwards along the rear property boundaries adjacent to Pattles Fen to TM 110340. It continues to follow rear property boundaries around a field, south-west then south east and then generally west for a short distance to TM109335. Here it turns south along a field boundary to the west of the Duck Decoy Pond to TM 109333, where it cuts across a path in a straight line to the security fence around the Brantham works site. It follows the security fence around the Duck Decoy Pond to TM 111333, where it continues south-east along the security fence to the railway property boundary at TM 112332.

Boundary Considerations:

Issues Influencing the Boundary Line

Following the informal consultation this stretch of boundary was re-considered to enable an

area of qualifying land extending to the church and lying outside the settlement boundary (including the Open Access land at Pattles Fen), to be included within the boundary.

A further issue influencing the boundary line in this section was the potential impact of the Brantham Regeneration Area. It was concluded that whilst the boundary in this stretch includes part of the land which is covered by the Brantham Regeneration Area Plan, the boundary excluded any areas allocated for development within the Plan. Those parts of the Plan Area which do lie within the boundary are identified as 'Green Spaces' which would not be developed. Since this area contains an important feature of historic interest (the duck decoy) and an area of attractive tributary valley land which is a continuation of the undeveloped slopes of the existing AONB, and clearly visible from the estuary and its southern slopes, its inclusion within the boundary was found to be justified. This issue was re-visited following the informal consultation and also in light of the subsequent approval of an application for a rail depot and sidings to the south-west of the boundary. It was concluded that overall in this area the impact of the proposed development in the immediate vicinity of the boundary would be minimal due to the low heights of the shunt/stabling proposed in the adjacent area. In addition the taller depot building to the south-west would be largely obscured from this area by the valley topography and intervening tall vegetation and its impact reduced by distance and mitigating planting, so the boundary was left unchanged.

The boundary provides an appropriate join with the existing AONB. From the duck decoy, a feature of interest on the margin, the boundary crosses from a field boundary hedge west of the decoy to the security fence around the Brantham Regeneration site and follows the fence to where it meets the railway property boundary fence, crossing the railway lines in a straight line to the existing AONB boundary on the south side of the railway.

Easily Distinguished Features

The boundary in this section largely follows roads, including the Church Lane, School Lane Ipswich Road and the A137 for a short stretch. It also follows rear property boundaries and a field boundary. There is also one short stretch where a lack of continuous features meant that the boundary cuts across in a straight line from a field boundary across a path to a security fence. It also crosses the railway in a straight line from this security fence to re-join the AONB boundary at TM 112332.

The boundary around Pattles Fen follows the edge of roads and rear property boundaries and land within the settlement boundary is excluded.

Administrative Boundaries

No administrative boundaries have been utilised as boundary features in this section.

Settlements

The boundary line enables land within the settlement boundary of Brantham to be excluded, as determined in the evaluation. A few houses (such as Brantham Glebe) which lie outside the settlement boundary have been included where they lie within a sweep of qualifying land.

Development

Recently approved developments in the Brantham Regeneration Area were reviewed and no changes were considered necessary at this time. An area of land under consideration for a housing allocation adjacent to Church Farm was excluded from the boundary.

Features of Interest

The boundary has enabled the inclusion of the Brantham Duck Decoy, a dunbird or pochard pond designed to lure birds from the estuary. By including the duck decoy, a ditched enclosure visible as a crop mark in dry weather adjacent to the sewage works has also been included within the boundary. The change made to the boundary after the informal consultation has enabled the inclusion of the County Wildlife Site at Pattles Fen, an area of fen and woodland priority habitat.

3.4 Boundary Justification Table Three: Proposed Boundary Extension of the Suffolk Coast and Heaths Area of Outstanding Natural Beauty to the West at Freston

Proposed Boundary Extension of the Suffolk Coast and Heaths Area of Outstanding Natural Beauty to the West at Freston (Map 3).

Section Ten (on Map 4): from the AONB boundary south of Redgate Lane to the AONB boundary near Freston House (for detail see Map 3)

Boundary Description:

The boundary leaves the existing SC&H AONB boundary at TM 161398 to follow the south side of a track westwards, then south-west across a reservoir dam to TM 161397. It continues south-west along a field boundary fence to the boundary of Stalls Valley Wood at TM 160396. It follows the Stalls Valley woodland boundary generally south-west, then for a short distance a garden boundary to the east side of a track at TM 153393, which it follows south to where it joins Valley Lane at TM 153392. It crosses Valley Lane in a straight line and continues north-west along the south side of the lane to TM 152393, where it turns south, along the east side of a track to TM 153390, where it meets the boundary of Holbrook Park.

It follows the woodland boundary around Holbrook Park, first west, then south; then generally eastwards, including Shrub Wood, to TM 152381, where it continues around the boundary of Great Birch Wood to TM 156377. Here, it joins and follows a bridleway running generally north immediately adjacent to the boundary of Great Birch Wood, then continues along the bridleway north-east, then north to Cutler's Wood at TM 157382. It continues along the bridleway around Cutler's Wood, north-east to TM 160384, where it cuts across the track in a straight line to the boundary of Cutler's Wood, which it follows generally northwards, and then generally east to TM 160392. Here it continues along the south side of a track to TM 161392, then follows the woodland boundary around a small area of un-named woodland to TM 163391. Here it follows a property boundary north-east, then south-east around and excluding the property known as Broom Knoll, to TM 164391. It then follows the north side of the track to its end at Lodge Farm Cottages, where it re-joins the existing SC&H AONB boundary at TM 166393.

Boundary Considerations:

Issues Influencing the Boundary Line

The key issue influencing the boundary line in this section was the transition in natural beauty from the higher quality land within the valley system to the surrounding lower quality plateau farmland, where there is a clear change resulting from the reduction in the complexity of landscape patterns, topography and vegetation types on the plateau and some higher slopes. This issue was considered further and it was concluded that drawing the boundary line beyond the Candidate Area along some of the surrounding tracks and bridleways, which represent the strongest features on the ground around parts of the valley system, would include non-qualifying land. A more conservative line which still follows

features which are present on the ground was thus sought nearer to the break of slope of the two qualifying tributary valleys, in accordance with Natural England Guidance, even though this resulted in a slightly more complex line in places.

A further issue was the need to develop a boundary line to exclude the third, most northern tributary valley, which the evaluation concluded did not meet the criterion of natural beauty and was thus excluded from the Candidate Area. In order to achieve this, a clear boundary line was sought from the existing SC&H AONB boundary which runs in close proximity, following a track southwards just to the north of this valley, before diverting off to the east. A boundary line was chosen which, on leaving the existing AONB boundary, turns west then south-west, along a track for a short distance, crossing this tributary valley near its confluence with the central tributary valley, along the line of a reservoir dam, and continuing along a field boundary fence line south-westwards to exclude the reservoir and the lower quality, upper parts of the valley. As a result, a field at the valley confluence which lies on both sides of the brook and now contains a poplar plantation, has been included within the boundary. This plantation was not felt to detract significantly from the natural beauty of the area and its inclusion also enabled the inclusion of an adjacent sloping area of permanent grassland on the valley slopes and some broadleaved woodland.

Consideration was given to whether the neighbouring areas of ancient woodland at Holbrook Park and Cutlers Wood which lie on the plateau at the south-western end of the valley system (and play an important role in providing a sense of enclosure around the two qualifying tributary valleys) should also be included. It was concluded that these ancient and historically important semi-natural woodlands (mediaeval Park, SSSI and local wildlife site) are features of significant natural and cultural heritage interest in their own right, lying at the margins of the boundary. This, and the role they play in framing the head of the valley system and in masking the transition to plateau farmland, meant that their inclusion was justified.

Consideration was also given to whether an area with tributary valley landform immediately to the south-west of Holbrook Park (which forms part of the Alton Water Reservoir valley) could also be included with Holbrook Park. Whilst this area was identified in the evaluation table for the Shotley Peninsula Plateau as having some scenic quality and visual interest, it lies beyond the Freston Brook valleys, within an area of non-qualifying land which overall, lacks distinctiveness due to the intensity of modern agricultural use and has thus not been included. The boundary was kept tight to the boundary of the features of interest at the margin of the two qualifying Freston Brook valleys and excludes the non-qualifying surrounding land.

Easily Distinguished Features

The boundary largely follows tracks, lanes, field boundaries and woodland boundaries. Short stretches follow a reservoir dam, a bridleway, and property boundaries, all of which are clear features on the ground.

Administrative Boundaries

No administrative boundaries have been utilised as boundary features in this section.

Settlements

There are no settlements within the boundary.

Development

There are no known proposed or existing allocations for development in this section.

Features of Interest

Holbrook Park and Cutler's Wood are included in their entirety, bringing these two parts of the 'Freston and Cutlers Wood with Holbrook Park SSSI' within the AONB. The entire SSSI, which is split by the current SC&H AONB boundary, is thereby included within the boundary.

Appendix One: Natural England Boundary Setting Considerations

Extract from Appendix Four of "Guidance for Assessing Landscapes for designation as National Park or Area of Outstanding Natural Beauty in England", Natural England, March 2011.

Boundary Setting Considerations

Transition areas: The boundary should not be expected to be a sharp barrier between areas of differing quality. Often there will be a transition of natural beauty and opportunities for open-air recreation across a sweep of land: in those cases the boundary chosen should be an easily identifiable feature within this transition. The boundary should be drawn towards the high quality end of the transition in a manner that includes areas of high quality land and excludes areas of lesser quality land ie it should be drawn conservatively. Visual associations may also be used to help define the extent of land for inclusion in these circumstances.

Types of boundary: Wherever possible, an easily distinguishable permanent physical boundary should be chosen. Boundaries should not if possible be overly complex or convoluted. Where a boundary follows a road, the road verges and embankments may be included in the designation where they blend into the wider landscape.

Other administrative boundaries: Where local government boundaries follow suitable lines, it may be administratively convenient to adopt them. In the majority of cases, however, they will be unsuitable. Similarly, land ownership is not itself a reason for including or excluding land from designation – there will often be instances where part of a landholding sits within the designated area and part sits outside.

Inclusion of settlements: A settlement should only be included if it lies within a wider tract of qualifying land (whether or not this is part of the same designation), having regard to the influence of the settlement on the land in question. Settlements should be assessed on their individual merits and particularly on their character, qualities and relationship to adjoining countryside. The extent to which countryside penetrates the built-up area may also be relevant.

Integrity of settlements: Towns or villages should not normally be cut in two by a National Park/AONB boundary. The ability of a settlement to act as a gateway to a designated area is not dependent on its inclusion with a designation. A settlement does not equate to a parish and the division of parishes is acceptable in drawing a boundary.

Incongruous development: Unsightly development on the edge of a National Park/AONB should generally be excluded unless it is of a temporary or transient nature.

Land allocated for development: Land on the margins of a National Park/AONB identified in development plans (both adopted and emerging), or having the benefit of planning permission, for major built developments (including the extraction of minerals and other deposits) should normally be excluded from the Park/AONB, unless the land will be developed or restored to a land use and quality which contributes to Park/AONB purposes.

Land should not be included merely to seek to protect it from specific development proposals.

Features of interest: Areas and features of wildlife, geological, geomorphological, historic, cultural or architectural value, which are situated on the margins of a National Park/AONB, should be included where practicable providing that they are situated within a tract that meets the statutory criteria.

Marine boundaries: In coastal areas where a marine boundary is to be drawn, the boundary should follow the mean low water mark or the County boundary in the case of estuaries.

The metalled surface of a road normally remains outside the National Park.

Proposed development schemes included in emerging development plans will be afforded varying weight depending on the extent to which they have progressed through the development plan preparation process and also the extent to which any adopted plans may remain relevant.