



# Suffolk Coast & Heaths Area of Outstanding Natural Beauty: Boundary Variation Project

## Consultation Document

A proposal to extend the Suffolk Coast & Heaths Area of Outstanding Natural Beauty

[www.gov.uk/natural-england](http://www.gov.uk/natural-england)





# About Natural England

We are the government's adviser for the natural environment in England, helping to protect England's nature and landscapes for people to enjoy and for the services they provide.

Within England, we are responsible for:

- Promoting nature conservation and protecting biodiversity
- Conserving and enhancing the landscape
- Securing the provision and improvement of facilities for the study, understanding and enjoyment of the natural environment
- Promoting access to the countryside and open spaces and encouraging open-air recreation
- Contributing in other ways to social and economic wellbeing through management of the natural environment.

To find out more about our work visit:

<https://www.gov.uk/government/organisations/natural-england>

**This document contains useful information that will help you to comment on a proposed extension to the Suffolk Coast & Heaths Area of Outstanding Natural Beauty.**

**We recommend that you read it before completing the enclosed response form.**

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Looking east down the Stour estuary

# Foreword

Landscape is where people come into direct contact with the natural environment, whether it is the view from our back doors or the majesty of distant mountains. Landscape is how people come to understand the natural environment as a whole, encompassing diverse habitats, rare species, historic features and a whole range of public benefits such as carbon storage and opportunities for recreation. But it is beauty in the landscape that draws and holds the eye.

We are very fortunate to have some fantastic landscapes in East Anglia, with the Broads and several Areas of Outstanding Natural Beauty already receiving protection. For some years there has been discussion about whether additional areas around the Stour estuary should have the same level of landscape protection as the existing Suffolk Coast & Heaths Area of Outstanding Natural Beauty (AONB). Natural England has now produced proposals for varying the boundary of the AONB, and this consultation seeks your views about these proposals.

We want to hear from everyone who has an interest in the area and cares about its future. If you would like to have your say, please spend some time reading this consultation document and send us your views by completing the enclosed response form. Alternatively you may respond via <https://consult.defra.gov.uk/natural-england/suffolk-coast-and-heaths-aonb>. The consultation ends on 20th April 2018 and you can send us your comments any time before this date. If you would like to speak directly to the team working on this project then please drop in at one of the events we are holding locally in the area (see local press or phone Jonathan Dix on 0208 0265 774 for details).

We will keep everyone informed of progress by publishing the outcome of this consultation later in the year. We look forward to receiving your responses.



**Andrew Sells**  
Chairman of Natural England

# Introduction

Natural England is the public body responsible for conserving and enhancing the natural environment in England. One of Natural England's responsibilities is to decide whether an area should be given special status and protection by designating it as a National Park or Area of Outstanding Natural Beauty (AONB). The purpose of AONB designation is to conserve and enhance an area's natural beauty. AONBs are designated by Natural England using statutory powers in the Countryside and Rights of Way Act 2000.

For many years there has been a local desire to extend the Suffolk Coast & Heaths Area of Outstanding Natural Beauty (SC&H AONB) southwards into Essex, which has been supported by the AONB Partnership and local authorities.

A formal request was put to Natural England by the AONB Partnership proposing a variation to the AONB boundary to extend the designation across the Stour estuary including the southern shore. Natural England's Board subsequently approved a partial review of the AONB boundary in the area of the Stour Estuary 'to determine for itself whether it should be varied'.

Assessments to investigate which landscapes meet the legal requirements for inclusion in an AONB have now been completed and proposals have been developed to designate specific areas. We would now like to give all those with an interest in the proposed extensions the opportunity to express their views on whether these areas should be designated.

The purpose of this consultation is to seek your views on whether these areas have the qualities required for inclusion within an AONB, whether they should be designated and whether the proposed boundaries are appropriate.

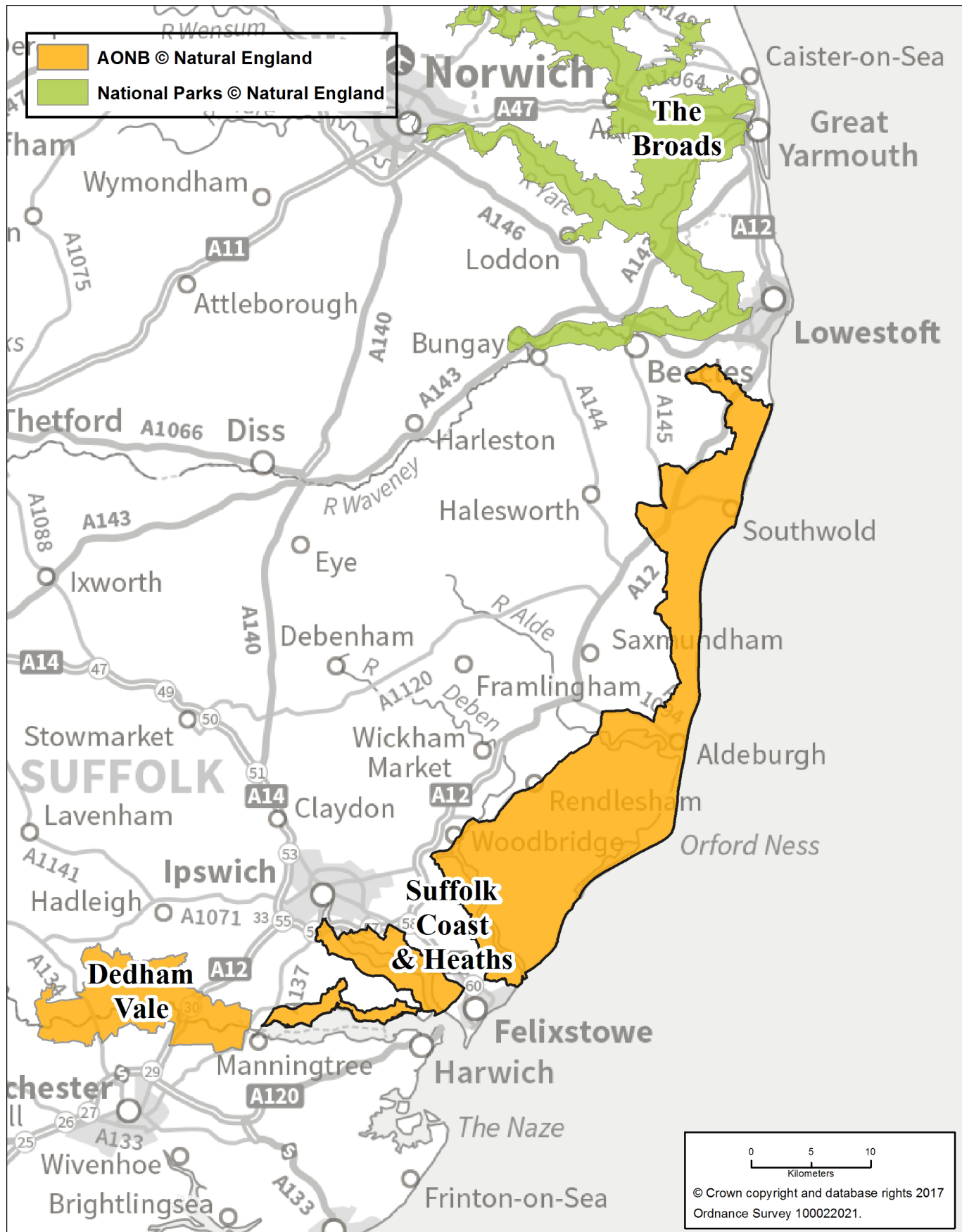
**A response form is enclosed for you to express your views, but please read this Consultation Document first – it contains important information that you will find useful in making your comments.**

Further information, expressing the detailed analysis which led to these recommendations, is also available as separate Supporting Documents. Copies of the Supporting Documents can be downloaded from <https://consult.defra.gov.uk/natural-england/suffolk-coast-and-heaths-aonb> or by emailing us at [sc&haonbdesignationproject@naturalengland.org.uk](mailto:sc&haonbdesignationproject@naturalengland.org.uk) or by writing to:

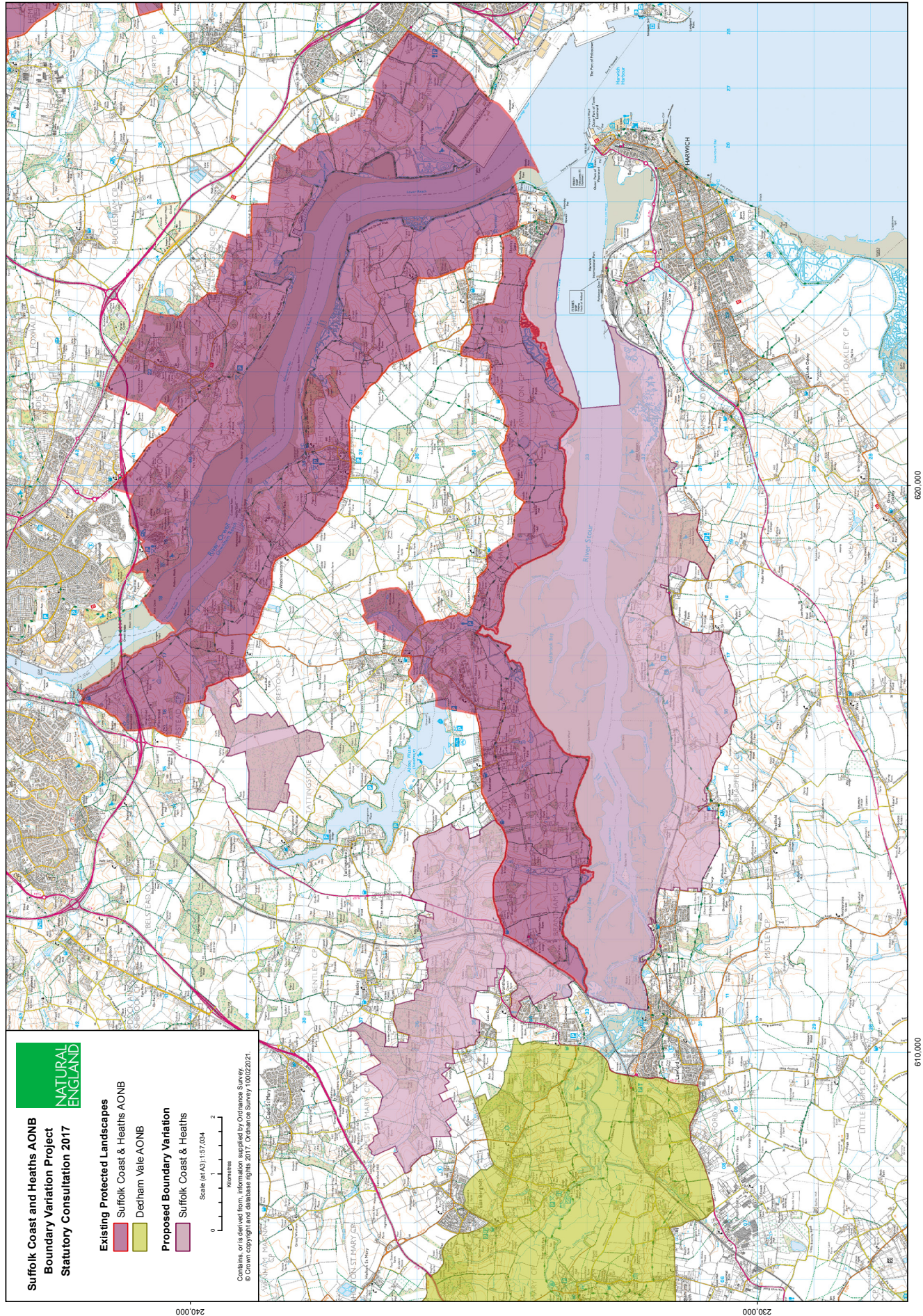
Suffolk Coast & Heaths AONB Boundary Variation project, C/O Jonathan Dix, Eastbrook, Shaftesbury Road, Cambridge, CB2 8DR

**The closing date for comments to arrive is 20 April 2018.**

**Figure 1:** Map showing the existing Suffolk Coast & Heaths AONB Boundary



**Figure 2:** Proposed extension to the Suffolk Coast & Heaths AONB



## What are Areas of Outstanding Natural Beauty?

Areas of Outstanding Natural Beauty (AONB) are designated for the purpose of conserving and enhancing their natural beauty. There are 34 Areas of Outstanding Natural Beauty in England including the Suffolk Coast & Heaths AONB and the Dedham Vale AONB. Designation as AONB means giving an area special legal protection.

Once an area has been designated by Natural England, activities relating to the purpose of AONB designation are coordinated and led by local authorities, who also have a legal responsibility to produce a Management Plan for the area. In carrying out their duties they often form wider partnerships with other organisations. Any public body taking a decision or undertaking activity that affects land in an AONB has a duty to have regard to the purpose of the designation when carrying out its work.

AONBs are largely funded by a contribution from the local authorities in the area and a grant from Defra and may also seek additional funding from other sources.

## Who looks after Areas of Outstanding Natural Beauty?

Most AONBs have a management team whose activities are overseen by a Joint Advisory Committee (JAC) and whose role encompasses the management of the staff team and its finances.

Section 89 (2) of the CRow Act 2000, places a duty on relevant local authorities to prepare and publish a plan which formulates their policy for the management of an AONB and for the carrying out of their functions in relation to it and a further duty to review the plan at "intervals of not more than five years". An AONB Management Plan sets out the policy for the management of an AONB and includes an action plan for carrying out activity in support of the purpose of designation. The AONB Team co-ordinates, facilitates and delivers certain countryside management functions as set out in the Management Plan.

The local authorities whose area wholly or partly includes land currently designated as part of the SC&H AONB and to which the statutory powers and duties relating to AONBs apply, are Suffolk County Council (SCC), Suffolk Coastal District Council (SCDC), Waveney District Council (WDC), Babergh District Council (BDC) and Ipswich Borough Council (IBC). Planning and development control in an AONB remain the responsibility of the local authorities.

The SC&H AONB team is hosted by Suffolk County Council. Individual posts on the team include the AONB Manager, Countryside Officers, a Suffolk Estuaries Officer, a Partnership Officer, an AONB Projects Officer (responsible for developing externally funded projects), plus time limited posts specific to individual major projects.

## How are Areas of Outstanding Natural Beauty designated?

Natural England is responsible for considering which areas in England meet the criterion, set down in law, for being included in an AONB, and also whether to proceed with their designation. To do this Natural England carries out assessments, consults local authorities and people and undertakes the legal process that results in an area being designated. The final decision, however, lies with the Secretary of State. An area only becomes part of an AONB when the Secretary of State confirms a legal order made by Natural England.

What is the legal criterion for designating an Area of Outstanding Natural Beauty?

Natural England has a power under the Countryside and Rights of Way (CRow) Act 2000 to designate land as AONB as set out in Section 82(1) of the Act. In summary this states that Natural England can designate an area in England as AONB if it is satisfied that it has such natural beauty that its designation is desirable for the conservation and enhancement of its natural beauty. Section 83(7) of the same Act gives Natural England the power to vary the boundaries of existing AONBs.



Natural beauty is more than just “beautiful scenery”. The Natural Environment and Rural Communities Act, 2006, clarified that the wildlife and cultural heritage of an area as well as its natural features can contribute to the natural beauty of landscapes. For example the presence of particular wildlife or visible archaeological remains can make an appreciable contribution to an area’s sense of place and heighten perceptions of natural beauty. Natural beauty can also be found in landscapes that have been altered by humans through agriculture, forestry or in parkland.

### How are landscapes assessed for designation?

The approach used for the Suffolk Coast & Heaths AONB partial boundary review follows Natural England’s approved “Guidance for assessing landscapes for designation as National Park or Area of Outstanding Natural Beauty in England” (March 2011).

To designate an area as AONB, Natural England must answer the questions below:

- Does this landscape have outstanding natural beauty?
- Is it desirable to designate this landscape as an AONB for the conservation and enhancement of its natural beauty?
- Where should the boundary be drawn?

Only if it is considered that there is sufficient natural beauty, will an assessment of desirability be warranted and only if the conclusion of this is positive, will detailed boundary proposals be developed. Having reached this conclusion, the legislation also requires Natural England to consult the relevant county and district councils.

Each of these stages is described briefly below. The full assessments are available as Supporting Documents and accessible via <https://consult.defra.gov.uk/natural-england/suffolk-coast-and-heaths-aonb>.

### Identifying a Study Area for assessment

Firstly a decision must be taken on the extent of the area to be assessed for designation. This is in order to make the assessment manageable and to ensure that resources are concentrated on areas which are likely to have potential for designation. This process is guided by the Natural England Board and by initial assessments of an area.

### Describing the character of an area

The European Landscape Convention 2000 defines ‘landscape’ as: “An area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors.” The first step in understanding what makes any landscape special is to describe it in a relatively neutral way.

Landscape character is defined as a distinct, recognisable and consistent pattern of elements in the landscape that makes one landscape different from another, rather than better or worse. Landscape character assessment is the tool used to define areas of differing landscape character and to describe them in a neutral way. Existing Landscape Character Assessments (LCAs) are used by Natural England (along with other data sets and field assessment) to define ‘Evaluation Areas’ for assessment.

### Evaluation stage

The **Evaluation Areas** identified are then tested against the single statutory criterion of ‘outstanding natural beauty’. The outcome of this stage is the identification of areas which are considered likely to meet the natural beauty criterion and which can then be considered as a **Candidate Area** for further consideration in relation to the desirability of designation.

### Making judgements about natural beauty

Once an Evaluation Area has been described (with reference to an LCA), it is evaluated to establish whether it has sufficient natural beauty for it to be designated. Natural beauty is a subjective characteristic of a landscape and ultimately involves value judgments. In deciding whether an area has outstanding natural beauty, Natural England must consider the merits of an area in comparison with ordinary countryside.

In order to make this judgment in a transparent and consistent way, Natural England uses a set of factors which are considered to contribute to natural beauty. These are set out in Table 1. A more detailed version of this Table can be found in the Supporting Documents.

**Table 1:** Factors Related to Natural Beauty

|   |
|---|
| <b>Landscape Quality</b><br>This is a measure of the physical state or condition of a landscape.  |
| <b>Scenic Quality</b><br>The extent to which a landscape appeals to the senses (mainly, but not only, the visual senses).   |
| <b>Relative Wildness</b><br>The degree to which relatively wild character can be perceived in a landscape and contributes to its sense of place. (NB all of England's landscapes have been influenced by human activity over time, which is why we use the term relative wildness).                                   |
| <b>Relative tranquillity</b><br>The degree to which relative tranquillity can be perceived in a landscape (ie whether an area appears quiet, remote and relatively free from human influence or development).   |
| <b>Natural Heritage Features</b><br>The influence of natural heritage on people's perception of the natural beauty of a landscape. Natural heritage includes features formed by natural processes, wildlife, wild flowers and geological features.  |
| <b>Cultural Heritage</b><br>The influence of cultural heritage (such as buildings, archaeology and designed landscapes) on people's perception of the natural beauty of a landscape and the degree to which associations with particular people, artists, writers or events in history contribute to such perception. |

Not every factor listed in Table 1 needs to be present in a landscape in order for it to have sufficient natural beauty. By considering all the factors together a judgement can be made as to whether an area meets the criterion for designation overall. Applying this analysis enables the extent of land likely to meet the statutory criterion to be more precisely defined. These refined areas are called Candidate Areas for designation.

Once an area has been identified as qualifying for inclusion in a Candidate Area, Natural England must determine whether designation of the area is desirable.

### **Deciding whether it is desirable to designate**

An area of land that satisfies the natural beauty criterion is capable of being included in an AONB. However, designation does not follow automatically: it is for Natural England to exercise its judgment as to whether a Candidate Area, which meets the natural beauty criterion should become part of an AONB in order to achieve the statutory purpose of the conservation and enhancement of natural beauty.

To establish whether it is desirable to designate an area as an AONB, Natural England asks the five questions set out in Table 2:

**Table 2:** Is it Desirable to Designate?

|   |
|---|
| Is there an area which satisfies AONB technical criterion?  |
| Is the area of such <b>significance</b> that the AONB <b>purpose</b> should apply to it?  |
| What are the issues affecting the area's <b>special qualities</b> and understanding and enjoyment?                              |
| Can AONB purposes be best pursued through the <b>management mechanisms, powers and duties</b> which come with AONB designation? |
| Are there <b>other relevant factors</b> which tend to suggest whether it is or is not desirable to designate the area?          |

Having considered these questions and relevant evidence, it is for Natural England to decide whether or not, a particular area is of such national significance that it should be designated as AONB and managed to achieve the statutory purpose.

### Identifying a suitable boundary

A detailed boundary is drawn for each proposed AONB extension area to show where it is desirable for a particular designation to begin and end. Natural England develops proposed boundaries using a suite of principles, including those in Table 3 below.

**Table 3:** Boundary Setting Considerations

|   |
|---|
| <b>Transition areas:</b> Natural beauty often changes gradually over a sweep of country rather than suddenly from one field to another. In these 'areas of 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.  |
| <b>Types of boundary:</b> Wherever possible, a clear physical feature should be chosen.   |
| <b>Other administrative boundaries:</b> Administrative boundaries (such as county or parish boundaries) are often unsuitable because they are hard to see on the ground or do not correspond with the area of high natural beauty. 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. |
| <b>Inclusion of settlements:</b> Towns and villages at the edge should only be included if they are within and part of a sweep of qualifying countryside.   |
| <b>Splitting of settlements:</b> Towns or villages should not normally be cut in two by an AONB boundary where it can be avoided.   |
| <b>Incongruous development:</b> Unsightly development on the edge of an AONB should generally be excluded unless it is of a temporary or transient nature.  |
| <b>Proposed Developments:</b> Land at the edge of a proposed designation that is identified for development in development plans, or has existing planning permission should normally be excluded. Land should not be included merely to seek to protect it from specific development proposals.  |
| <b>Features of interest:</b> Areas and features of wildlife, geological, geomorphological, historic, cultural or architectural value should be included where practicable.  |

# Applying the approach to the review of the Suffolk Coast & Heaths AONB Boundary

This Consultation Document presents only outline information on the process undertaken for this project and about the three proposed extension areas identified during the process. If you would like more detailed information about these areas or about the initial identification of the Study Area, Evaluation Areas or Candidate Area or the assessment of the desirability of designation or development of the proposed boundaries then please refer to the Supporting Documents.

## Defining the Study Area

The Study Area was broadly defined by the Natural England Board decision to undertake a partial review of the boundary of the SC&H AONB 'southward into Essex', but two other factors were also particularly relevant in defining the full extent of land selected for consideration:

- Firstly the inclusion of parts of the Shotley Peninsula and the south side of the Stour estuary within a defined 'Additional Project Area' identified in the SC&H AONB Management Plan, and managed by the AONB Partnership even though it lies outside the existing AONB.
- Secondly the 'Dodnash Special Landscape Area' (SLA) identified by Babergh District Council which also covers parts of the Shotley Peninsula and is supported by specific policy in the local plan.

Since both of these areas have been considered locally to have significant landscape qualities they were included within the Study Area for completeness.

## Characterisation stage

The Suffolk Coast & Heaths National Character Area Profile plus local Landscape Character Assessments (LCAs) relevant to the study area were considered. The most up to date local-level LCA, which also follows current LCA Guidance and includes the area under consideration, was the Shotley Peninsula Landscape Character Assessment undertaken by Alison Farmer Associates for the Stour and Orwell Society in March 2013. The classification in this LCA was used as the basis for defining the Evaluation Areas.

## Evaluation stage

Evidence from initial desk study, mapping and site visits enabled the Study Area to be refined into Evaluation Areas. Parts of the Shotley Peninsula Plateau character area which lie outside the Dodnash SLA and areas affected by proximity to Ipswich and major infrastructure were excluded. Three discrete areas were subsequently defined to be taken forward to the detailed evaluation stage. They were:

- The Stour estuary and adjacent land on the estuary slopes.
- Tributary valleys bordering the Orwell estuary.
- The Dodnash Special Landscape Area.

These were further subdivided and each of the 11 sub-areas identified was tested against the factors outlined in Table 1. The evaluation included in-depth assessment of published information and data on a wide range of relevant issues. The relevance and significance of this information was also further tested in the field.

## Defining a Candidate Area

The evaluation process resulted in the identification of three areas considered to meet the statutory natural beauty criterion:

- The Stour estuary including the estuary itself, northern estuary valley slopes at Brantham and the majority of the southern estuary valley slopes.



- The Freston Brook valley, a tributary of the Orwell estuary which extends inland from the existing AONB boundary westwards and includes surrounding plateau woodlands which play an important role in framing the valley system.
- The Samford valley, a tributary of the Stour estuary, which extends further inland from the existing AONB boundary at Stutton Bridge and includes some areas of neighbouring Shotley Peninsula Plateau which are well wooded and are important in framing the valley system.

Together these formed a Candidate Area for further consideration.

## The Candidate Area

Each of the three areas identified as suitable for inclusion in the Candidate Area is considered separately below. The text below summarises the case for designation of each area in terms of the extent to which the natural beauty criterion is met, the desirability of designation and the proposed boundary.

## Proposed Stour estuary extension

### Context

This area broadly comprises the whole of the southern shores and open water of the Stour estuary and mudflats and saltmarsh areas in-between. It is contiguous with the existing AONB which includes only the northern valley sides of the estuary. It is defined by the main break in slope between the valley sides and wider plateau landscape beyond and, along with the existing AONB, forms a visual landscape unit with a strong estuarine influence.



Looking north across the Stour Estuary Nature Reserve from Copperas Wood

### Extent to which the natural beauty criterion is met

The parts of the Stour estuary which are considered suitable for inclusion within the proposed extension include:

- A small area north-east of Brantham which forms part of the undeveloped northern slopes of the estuary.
- The open water, mudflats and saltmarsh of the estuary.
- The majority of southern valley slopes from east of Mistley to the east of Copperas wood.

### Significance

Estuarine landscapes are an important component of the SC&H AONB. The AONB as currently designated includes very significant parts of the four estuaries of the Blyth, Alde & Ore, Deben and Orwell together with the estuary slopes rising above the north side of the estuary, but not the Stour estuary itself or its southern slopes.



This area, along with the northern estuary slopes within the existing AONB, encapsulates the best of the expansive and inward focusing estuarine landscape of the Stour. Special qualities are derived from the variety of landscape elements and the contrasting patterns and experiences they create. Here the natural shoreline and geologically important sandy cliffs, nationally important intertidal habitats of open water, mudflat and saltmarsh, are framed by gentle reclining estuary slopes which support ancient woodland/ trees, occasional stream valleys and contrasting intensively managed farmland. Long views across the water from either northern or southern valley slopes, or along the estuary, over the various curving bays and promontories, contrast with the more intimate and restricted views within the woodlands and folds in the landscape caused by tributary valleys. This is a dynamic landscape where the tides, changing pattern of moored boats, flocks of birds, calls of wildfowl and expansive skies are readily perceived and delight the senses, and where tranquillity pervades.

### Issues affecting the area's special qualities

The following issues are currently experienced in this area and are relevant to considering the difference AONB designation may make:

- Management of coastal processes such as sea level rise, the need for managed retreat loss of salt marsh and shoreline archaeology.
- Land management changes such as development, conversion of pasture to arable or pony paddocks, altering attractive landscape patterns.
- Loss of field boundaries due to hedge removal, lack of management or over-trimming and limited take up of environmental stewardship in some areas.
- Introduction of new incongruous elements such as large-scale barns or inappropriate planting which can disrupt patterns and create eyesores.
- Suburbanisation of lanes including changes to hedgerows relating to property boundary treatment.
- Loss of veteran trees due to lack of management and succession management/planting.
- Lack of traditional woodland management resulting in reduced biodiversity and character.
- Weakening of historic field patterns due to boundary management, removal or alteration due to development.
- Loss of traditional wet pastures due to conversion to arable or plantation.
- Development, including conspicuous development and associated light pollution which may adversely affect perceptions of tranquillity within the Stour estuary.
- Development in areas adjacent to but not included in the proposed extension or existing AONB, which may affect views and perceptions of tranquillity within them (such as regeneration schemes and port developments).
- Access to the foreshore, increased visitor numbers and pressure for parking and facilities which may result in the disturbance of wildlife and especially overwintering birds.
- Water sports which may cause visual and audible disturbance affecting nature conservation value and perceptions.
- Bait digging which can cause disturbance to wildlife and trespass issues.
- Blocking of views across the estuary or to key landmarks as a result of development or vegetation growth.

The area is closely linked (in visual, natural and cultural heritage terms) with the adjacent northern shores of the estuary which already lie within the AONB. Natural England considers that strategic management of this area as a whole would be beneficial. Including these areas within the AONB would ensure more consistent forward planning and decision making through the focus provided by the statutory duties and powers which would apply. The dedicated purpose of the SC&H AONB Management Plan and the assistance that the AONB team can provide in supporting land managers and others will help to resolve issues affecting the Stour estuary as noted above.



### Other relevant factors

**Brantham Regeneration Area:** The Brantham Regeneration Area has been identified for major re-development and lies in immediate proximity and partially within the proposed extension. The Natural Beauty Assessment concluded that a small area of qualifying land within the Brantham Regeneration Area met the natural beauty criterion and is physically part of a wider sweep of qualifying land. It was therefore included in the Candidate Area. In a subsequent planning application for the Regeneration Area, the land in question was identified as open space offering opportunities for conservation and enhancement. Natural England considers that since the area meets the natural beauty criterion overall and contains a feature of interest (a historic duck decoy), inclusion of the qualifying area within an AONB extension would encourage an integrated approach to the proposed further enhancement of this area and the management of the high levels of recreational use it receives. Natural England has therefore concluded that it is desirable that this land is included in the proposed extension.

**Mistley Place Park and adjacent recreation area:** Land between Manningtree and Mistley forms part of an inland tributary valley and former parkland landscape. The Natural Beauty Assessment concluded that land south of the railway meets the natural beauty criterion but that Mistley Place Park and the adjacent recreation area (which lie closest and is contiguous with the wider estuary landscape) do not meet the natural beauty criterion. In order for the land south of the railway to be included in the proposed AONB variation, the non-qualifying land between The Walls and the railway would need to be 'washed over' (ie included within the national designation).

Natural England has taken relevant factors into account. These included the location, size and effect of the non-qualifying land, whether the non-qualifying land in question is sufficiently surrounded by qualifying land to merit the application of wash-over, and whether designation would bring added benefit over and above current management. Natural England concluded however that the qualifying landscape between Manningtree and Mistley is not of sufficient size, nor satisfactorily located to justify designation or the application of wash-over to non-qualifying areas and that designation would not bring significant added benefit. This whole area has therefore been excluded from the proposed extension.

### The proposed boundary

The proposed boundary has been drawn to include the higher quality land, including areas with a strong estuarine influence and views across the open water of the estuary. It includes the majority of the estuary itself and the slopes rising above it to the edge of the surrounding plateau land. The boundary excludes land of a lower quality such as areas affected by settlements and industrial areas. The head of the estuary has been excluded as the level of natural beauty is in transition and the area is affected by a range of incongruous features as well as adjacent development and derelict land. In addition, the waterway becomes significantly narrower and views of the wider estuary are progressively lost towards the head of the estuary. Manningtree and Mistley and the land in between are excluded from the boundary.

East of Mistley, the boundary largely follows the B1352 and minor roads along the break of slope between the estuary slopes and the surrounding plateau, towards Wrabness village. It also includes Stour and Copperas Woods, before following the Mean High Water Mark to where this joins Mean Low Water Mark at the Carless Oil Refinery. Since there are no physical features to follow across the estuary mouth it follows Mean Low Water and the County Constituency Boundary across the estuary in order to exclude lower quality areas to the east, including the Ramsey valley, Harwich and Shotley Gate.



# Proposed Samford valley extension



## Context

This area broadly includes the middle and upper reaches of the Samford valley. It extends from the head of the valley to where it meets the existing AONB boundary at Stutton Bridge and includes some neighbouring areas of plateau which retain a strong valley character and high level of natural beauty.

Samford valley from the edge of Grange Country Park looking north towards Great Martin's Hill Wood

## Extent to which the natural beauty criterion is met

The area includes:

- The main Samford river valley, running north, then west from the existing AONB boundary at Stutton Bridge to the A12 and several small tributary valleys running into the main valley.
- Some peripheral areas of the Shotley Peninsula plateau in the immediate vicinity of the Samford valley, which play an important role in framing the Samford valley system. These include the cluster of ancient woodlands along the edge of the plateau landscape, some of which spread down onto the valley slopes, eg Dodnash, Holly and Great and Little Martin's Woods; as well as areas which provide views across the main valley or into the head of the tributary valleys, such as at Hill Farm, Manor Farm and Stutton Lane.

## Significance

This proposed extension forms a long and complex apparently hidden valley to the north of the Stour estuary. Special qualities relate to the distinctive pattern of extensive ancient semi-natural woodlands, babbling streams, narrow lanes and greenways, irregularly shaped meadows and wet pasture, broad hedges, and vernacular farm buildings which, combined with the complex and sometimes steep morphology of the valley, give high landscape and scenic quality. This is an inward-facing, traditional pastoral and small-scale landscape which has local visual complexity, and a tranquil, remote character.

## Issues affecting the area's special qualities

The following issues are currently experienced in this area and are relevant to considering the difference AONB designation may make:

- Intrusion of development beyond the area on the surrounding plateau.
- Pressure for recreation development resulting in caravan park development and increased disturbance and noise.
- Road and rail improvements such as widening, lighting and signage which may impact on tranquillity and rural character.
- Changes in land use which mask topography and traditional valley management practices.
- Introduction of non-native woodland and poplar plantations disrupting traditional patterns.
- Expansion of settlements into undeveloped parts of the valley or affecting the skyline.
- Lack of traditional woodland management such as coppicing.



- Loss of native woodlands which perform an important role in framing views from the valley.
- Erosion of narrow rural lanes due to increased traffic and pressure for road improvements which may have an urbanising effect.

The inclusion over many years of most of this proposed extension within the SC&H AONB's Additional Project Area and its part designation within the Dodnash Special Landscape Area is a recognition of its long held value locally and of the role that AONB management can play in addressing the issues outlined above. Statutory designation as AONB with the immediate application of relevant statutory powers and duties and its formal inclusion in the SC&H AONB Management Plan would strengthen the ability of the AONB team to ensure the future conservation and enhancement of the area's natural beauty and would place a statutory duty on all public bodies to have regard to the area's conservation and enhancement.

### Other relevant factors

**Boundary complexity:** within this area the nature of the transition in natural beauty from higher quality valley land to the lower quality plateau is variable. In many places strong boundary features which would exclude the lower quality land do not exist. If simple, strong, pragmatic boundary features such as roads were sought in these areas, some significant stretches of plateau land with no valley influence, at the lower end of the transition in natural beauty and outside the Candidate Area, would need to be included within the boundary. After careful consideration it was concluded that overall, designation of this area is desirable and that a conservative boundary around the Samford Valley was preferable compared to one which would include relatively large areas of non-qualifying land.

On balance it was concluded that a complex, conservative boundary which would enable the inclusion of areas of particularly high quality whilst excluding areas of lower quality was more desirable than a simple pragmatic boundary line.

**Character of the Samford valley:** it is recognised that the Samford valley area shares many of its landscape characteristics both with land within the existing SC&H AONB and also with land within the Dedham Vale AONB, both of which are in close proximity in this area.

On balance it was concluded that inclusion of the proposed Samford extension within the SC&H AONB is justified because it is a continuous tributary valley of the Stour estuary, and is separated from the Dedham Vale AONB by a strip of land which was not deemed to meet the natural beauty criterion. Furthermore the Samford valley extension flows naturally and contiguously from the part of the Stutton Brook which already lies within the SC&H AONB.

### The proposed boundary

The proposed boundary provides an appropriate join with the existing SC&H AONB boundary and includes the qualifying higher quality land and woodland along the valley and its surrounding slopes whilst excluding the neighbouring lower quality, non-qualifying plateau. A boundary line has been identified along the rim of the valley, in an area which in several stretches has few continuous clear ground features. The boundary generally extends to the outside edge of woodlands which straddle the valley rim and continues onto the plateau, but not including land beyond the woods with no visual link to the valley system.

After careful consideration Natural England has concluded that the boundary should not be taken 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 that did not meet the natural beauty criterion and 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.

To 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 proposed boundary.

# Proposed Freston Brook extension



View north east to Freston Lodge farm from footpath

## Context

This area comprises the Freston Brook valley, a tributary of the Orwell estuary which extends inland from the existing AONB boundary westwards and includes some surrounding plateau woodlands which play an important role in framing the valley system. The valley shares the typical short tributary river valley structure of other small streams flowing into the Orwell estuary within the SC&H AONB.

## Extent to which the natural beauty criterion is met

The extension includes:

- The two more southerly tributary valleys of the Freston Brook valley system.
- Some neighbouring areas of plateau landscape at the western end of the valley system which play an important role in providing a sense of enclosure around the two tributary valleys, including Holbrook Park and Cutlers Wood. These areas also provide added features of interest to the margin of the valley system in their own right, through their high levels of natural and historic interest, scenic quality and tranquillity.

## Significance

The area forms a small hidden valley on the southern slopes of the Orwell estuary. Its special qualities are derived from the intimate scale and branching structure of the valley with its small pastures and interlocking topography, and adjacent woodland and parkland planting, framing views. This landscape, with its small-scale and enclosed character has a hidden and timeless quality and high levels of tranquillity, where traditional valley management patterns remain apparent and there is an absence of built form and human habitation.

## Issues affecting the area's special qualities

The following issues are currently experienced in this area and are relevant to considering the difference AONB designation may make:

- Pressure for wind farm development in the past and current masts and pylons intrude into parts of the Freston Brook landscape. The proposed extension remains vulnerable to the intrusion of development beyond the area on the surrounding plateau.



- Impact of deer on woodlands.
- Introduction of non-native woodland and poplar plantations disrupting traditional patterns.
- Loss of wet pastures due to drainage and loss of water quality due to run-off from surrounding plateau arable farmland.
- Conversion of valley slope pastures to arable.
- Lack of active traditional woodland management such as coppicing.
- Loss of historic features such as wood banks and diversity of ground flora due to lack of management.
- Loss of veteran trees due to lack of management and succession planning.
- Loss of woodlands which perform an important role in framing views from the Freston Valley and reinforcing estate character.

As with the Samford valley, the special qualities associated with the Freston Brook valley include its intimate small-scale and enclosed character. The extensive ancient semi-natural woodlands and habitats, small meadows, streams, narrow lanes and greenways within this proposed extension could all benefit from the broader integrated management and protection that AONB designation would bring. This integrated management and the planning status of AONB designation could also address many of the issues noted above.

### Other relevant factors

**Size of the proposed extension:** the area proposed as an extension to the SC&H AONB at Freston is small and particular consideration has been given to the desirability of a boundary variation in this area in this specific regard. The area proposed is however, an area of high quality with sufficient natural beauty to be considered for designation, hence its inclusion as a proposed extension to the AONB. It is considered likely that this area was not originally included within the original boundary of the AONB because of a pragmatic decision when the AONB was originally designated. The current SC&H AONB boundary in this area however does not reflect the natural beauty of the area. The application of the boundary setting criteria summarised in Table 3 enables the original boundary to be reconsidered in order to allow for an alternative more inclusive boundary to be identified for this area which brings in more land assessed as meeting the natural beauty criterion.

Natural England has concluded that it is desirable that more of the land assessed as meeting the natural beauty criterion in this area to be included within the AONB and that a boundary should be sought to include the higher quality land to the west of the existing boundary.

### The proposed boundary

The proposed boundary has been drawn to include the higher quality land within the valley system whilst excluding 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. The boundary does however include 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 and masking the transition to plateau farmland.



# The area proposed for designation as part of the Suffolk Coast & Heaths AONB

In summary, the area proposed for designation as part of the Suffolk Coast & Heaths AONB includes:

- The Stour Estuary including the estuary itself, northern estuary valley slopes at Brantham and the majority of the southern estuary valley slopes.
- The Samford Valley, a tributary of the Stour Estuary, which extends further inland from the existing AONB boundary at Stutton Bridge and includes some areas of neighbouring Shotley Peninsula Plateau which are well wooded and are important in framing the valley system.
- The Freston Brook Valley, a tributary of the Orwell Estuary which extends inland from the existing AONB boundary westwards and includes surrounding plateau woodlands which play an important role in framing the valley system.

It is important to note that the ultimate decision to extend the SC&H AONB is not taken on the basis of these individual separate areas in their own right but rather on the total area of the proposed designation. Natural England must stand back and consider the area as a whole to satisfy itself whether it is desirable to designate the qualifying areas as part of the SC&H AONB.

Together, the proposed area is closely related to the existing SC&H AONB, forming a largely contiguous area which includes the Stour, comprising the estuary and southern valley slopes to which the existing northern shores within the AONB relate and the Samford and Freston valleys forming hidden valleys to the Stour and Orwell estuaries respectively. This area shares the same geology as the wider AONB, comprising land between the inland boulder clay of Suffolk and Essex and the coastal fringe with its crags, gravels and sands. It reflects qualities found elsewhere within the AONB and forms part of the 'family' of estuaries and their associated tributary valleys within the existing AONB designation. It is thus representative of the existing designated landscape, sharing many of its qualities.

Collectively this area, in association with the existing AONB, comprises an outstanding lowland coastal and estuarine landscape. This area has special qualities which are rare in the national context and for which a local consensus regarding the desirability of designation as AONB has existed for many years. In addition, the relative national rarity of the area's largely estuarine landscape adds further weight to this conclusion.

The special qualities of the area proposed for designation, its national significance and the pressures impacting on its specific qualities, are such that the legislative provisions provided by the Countryside and Rights of Way Act 2000, combined with the particular focus given to these qualities in planning management, the application of specific integrated management initiatives and increased access to a broader range of specialist skills and other resources, make the area's inclusion within the SC&H AONB desirable. This is particularly important with regard to the issues noted above in relation to each part of the area and particularly threats of flooding, loss of inter-tidal habitats including saltmarsh (under increasing pressure from coastal squeeze), visual intrusion from major port and other development and inappropriate recreational use of the estuary.

Designation would formalise activity which has for many years been undertaken by the SC&H AONB team within the qualifying parts of the 'Additional Project Area' in relation to furthering the conservation and enhancement of the area's natural beauty. This is both via direct engagement in management activity and through influencing the work of other organisations with responsibility for activities relevant to the area. It would also formalise activity to conserve and enhance the special qualities of the parts of the Dodnash Special Landscape Area included within the proposed AONB extension should this local designation be removed in future.

In addition the area would benefit from the specific additional planning protection in the National Planning Policy Framework relating to AONBs. Designation would also extend the duty to have



regard to the statutory purpose of the AONB to the many authorities whose responsibilities encompass the Stour estuary and its associated tributary valleys such as the local authorities, the Environment Agency, Natural England and the utilities companies.

Including the proposed extension within the SC&H AONB would ensure a more consistent approach to this nationally important landscape in accessing resources, forward planning and decision making and through the focus provided by the statutory duties and powers which would apply, and in particular through the delivery of the statutory AONB Management Plan and its associated action plans.

Natural England has concluded that the area proposed for designation as indicated on maps accompanying this consultation document has outstanding natural beauty and that it is desirable that it should form part of the AONB and that the proposed new boundary should be subject to statutory and public consultation.

## What happens next?

Natural England is required by the Countryside and Rights of Way (CROW) Act, 2000, to consult the County and District Councils affected by the proposed boundary variations. In addition this consultation is being extended to allow everyone with an interest in the proposed extensions to comment on the proposals. At the end of the consultation we will analyse all the responses and review the proposals and if necessary, amend them to take account of any further relevant evidence provided. Depending on the number of responses received this is likely to take around three months. If no fundamental objections arise which cannot be overcome, and assuming no additional land needs to be included as a result of the consultation, the next stage will be to draw up a draft Order and to publish Notice of the Order in the London Gazette and other papers as required by Section 83(2) of the CROW Act.

The Notice period allows anyone who wishes to do so to make representations to Natural England, objecting to, supportive of, or proposing amendments to the Order, and stating the grounds on which they are made.



Looking north across the Stour estuary from the Essex Way west of Bradfield



If however as a result of the statutory and public consultation, additional land needs to be included within the proposed boundary variation, an additional statutory consultation will be required.

Following the Notice period, a further period of response analysis will be required and any further consequent changes made to the draft legal Order. It is worth noting that during the last landscape designation project over 3,500 responses were received, so it is difficult to provide a time estimate for this at this stage. Natural England Board approval will then be sought to allow the Order to be 'made' and submitted to the Secretary of State for confirmation. If there are any unresolved objections, these will be submitted to the Secretary of State with the Order, who has discretion to call a Public Inquiry to consider such objections further, before deciding whether or not to confirm the Order.

The Secretary of State may or may not confirm the Order, with or without amendment. This decision is not made to any specific timescale.

## Implications of designation

Designation as AONB would provide formal statutory recognition of the national importance of the natural beauty of the area concerned, and as a consequence, would provide the basis for a more coordinated and integrated approach to management which would give specific focus and priority to the natural beauty of the area. The proposed area, if designated, would then formally come within the ambit of the statutory AONB Management Plan and benefit from the incentives, powers, duties, responsibilities and resources that designation brings.

The benefits can be summarised as follows:

- Statutory application of the SC&H AONB Management Plan across the proposed area including in the Additional Project Area, the Dodnash Special Landscape Area and other areas of wider countryside regarded as meeting the natural beauty criterion.
- Full access to the AONB Team and the specialist land management knowledge and advice they can offer, providing an integrated focus on conserving and enhancing the area's special qualities.
- Formalisation of the AONB Partnership through the inclusion of land in north Essex, such that the powers and duty 'to have regard' to the AONB purpose would extend to Essex County Council and Tendring District Council in this area.
- All public bodies, statutory undertakers and holders of public office would have a statutory duty to have regard to the conservation and enhancement of the area brought within AONB.



Copperas Wood spring flora





Front cover image:

Looking north across the Stour estuary from the Essex Way west of Bradfield

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